ADUR & WORTHING
COUNCILS

Planning Services

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Our Ref: EIAOPINION/0003/18

Your Ref: 0808/268425-16 18 December 2018

Dear Mr Frisby

Request for Screening Opinion under Regulation 6 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended)

Thank you for your Screening Request received 4 December 2018 regarding the above.

The majority of the proposed development is within the existing American Express Elite Football Performance Centre site but it also includes undeveloped land to the east. The proposed development is considered to be "Schedule 2" development, as it comprises an urban development project on an area in excess of 1 hectare. It also comprises an extension of previous EIA development that has already been executed. I have therefore given consideration to the Selection Criteria for screening Schedule 2 development as set out in Schedule 3 of the Regulations.

Part of the site is not previously developed land and is outside the built up area and within the Local Green Gap as defined by the Adur Local Plan 2017. The development proposed for outside of the existing site comprises two additional football pitches with no floodlighting. Within the existing site the development comprises a new single storey Women's and Girls' Elite Football Training Centre (8m high) and an extension to the existing Men's and Boys' Elite Football Training Centre. Other development includes reconfiguration of existing pitches, the relocation of the existing spectator stand and additional vehicle parking spaces. This development will inevitably have some visual impact.

The existing site is, however, situated within the built up area boundary and is adjacent to the site allocated for significant residential and commercial development in the Local Plan under Policy 5, which has also recently received a Committee resolution to grant planning permission. The proximity of the site to the proposed development to the north leads me to agree that the proposal will not lead to a significant physical change in the locality. This

conclusion also applies to views from the South Downs National Park where the proposal will be seen in the context of that proposed much larger development.

With regard to landscape issues, the site is not within a “sensitive area” as defined by the Regulations, although it will be visible from the higher ground of the South Downs National Park to the north of the site. Taking account of the criteria in Schedule 3 to the Regulations it is not considered that the proposed development is likely to have a significant effect on that sensitive area having regard to its nature in relation to existing and proposed development. A Landscape and Visual Impact Assessment should however be submitted with the planning application to enable the impact to be comprehensively assessed.

In respect of traffic and transport, it is noted that you assert that that there would be no additional trip demand associated with the development. While an EIA is not required in respect of Highways and Transport, you are advised that a Transport Statement should be submitted with the application to support this argument, to include:

- Confirmation of the number of existing vehicle trips associated with the Performance Centre and an estimation of proposed trips likely to be generated by the proposed development;
- Construction traffic generation and management measures;
- Consideration of highway impact arising from the development; and
- Justification for the need for the additional parking spaces

In terms of ecology, the development will include land outside of the existing performance centre boundary. It is considered that the ecological impact can be adequately covered by an Ecological Survey and Report to be submitted with the application.

With regard to noise, there will be an expansion in the number of pitches and there could be an associated increase in activity, although it is noted that you assert that the additional pitches will allow for a better rotation of the pitches and that usage will remain broadly as existing.

The reorientation of the show pitch and the relocation of the stand to face properties south of the railway line will have some impact and a noise assessment will be required to be submitted to assess whether there will be an increase in noise impacts for those residents in Old Salts Farm Road. Of particular concern is the closer proximity of the stand (and floodlights) to residential properties compared to the existing situation. A light impact assessment should also be submitted for this reason, to include an assessment of the impact that the relocation of the floodlighting will have on the wider landscape. It is considered that both of these issues can be adequately assessed without the need for an EIA.

The development will result in the loss of a non-listed heritage asset (North Barn Farm) on land outside of the existing site but it is considered that this issue can be adequately addressed through a Heritage Statement and building survey.

The site lies within an area at risk of flooding but it is agreed that the proposed development is less vulnerable or water-compatible. It is noted that the existing reed bed is to be removed to accommodate the Women and Girls Training Centre and that improvements to the existing drainage scheme are proposed. Full details of the drainage scheme must be submitted with the application together with a Flood Risk Assessment.

In respect of air quality, the proposal is not considered to have significant effects if there are to be no additional traffic movements as a result of this development (to be demonstrated in the transport statement referred to earlier).

In respect of contaminated land, the Council's mapping system identifies the area to the east of, and including part of, North Barn Farm as being potentially contaminated. A preliminary investigation will be required to be submitted with the application, together with any necessary remediation strategy.

In conclusion, it is considered that while the proposed development will have some additional visual impact it is considered that this, together with the other impacts of such development, can be adequately considered during the course of the planning application, with reference to relevant supporting documentation as set out within this response, without the need for a full EIA.

Accordingly, in exercise of the powers conferred by Regulation 6, the Council adopts the opinion that the development described in your letter and accompanying information is not EIA development. Consequently, no Environmental Impact Assessment is required to be submitted for the development proposed.

I trust the above information is of assistance.

Yours sincerely

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