Sent: 26 October 2021 17:31

Subject: SMD/2021/068 - Advanced Proteins, Bones Lane, Cheddleton - UPDATED COMMENTS ON SCREENING OPINION REQUEST

Re-sent to correct the quoted reference number for the associated pre-application enquiry, this being the only change – but for avoidance of any confusion or doubt please substitute this version and delete the version sent earlier.

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Jane

My comments below are essentially limited to Landscape/Visual Impact issues.

Summary: The proposal is considered to be Schedule 2 development – under 2.7(a) and/or 2.10(a) and/or 2.10(b). Strictly, the screening opinion request includes insufficient information to make a reasonable assessment as to whether there are likely to be significant landscape and visual effects. However, with regard to information submitted with the associated pre-application request (PAD/2021/0046) I consider that significant landscape and visual effects would be likely to arise, and on that basis a full Environmental Impact Assessment may be considered necessary, although if landscape and visual effects are the only significant environmental effects considered likely then these may be acceptably considered by means of a comprehensive Landscape and Visual Impact Assessment submitted as part of a planning application, rather than by a full EIA.

For the purposes of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 and with reference to associated Government guidance on Environmental Impact Assessment:

The proposal is not Schedule 1 development.

The development appears to be Schedule 2 development, potentially under more than one of the specified development description (Column 1) and applicable threshold/criteria (Column 2) combinations of Schedule 2 of the Regs:

- Schedule 2, 7(a) – Food Industry, manufacture of vegetable and animal oils and fats – area of new floorspace exceeds 1000 square metres (*NB the area of new floorspace is not specified by the applicant/agent; does this mean insufficient information has been*

provided to enable proper consideration of whether the proposal is Schedule 2 development? That said, from the indicative site layout plan it is evident that the footprint area of the factory building itself would very substantially exceed 1000 square metres).

- Schedule 2, 10(a) – Industrial Estate Development Projects – the area of the development exceeds 0.5ha (*NB does a single factory and associated infrastructure qualify as an "industrial estate" for these purposes?* If so, the agent specifies the site area as approximately 2.9ha – although using Statmap measuring I get this to more like 2.5ha, but even so based on the indicative site layout plan it is evident that substantially greater than 0.5ha of the site would be occupied by buildings, roads, parking, firewater tank, biofilter and attenuation pond.
- Schedule 2, 10(b)(i) – Urban Development Projects – the development includes more than 1 hectare of urban development which is not dwellinghouse development (again from the indicative layout it is evident that over half of the total site area would be occupied by the various constituents of the development).

The proposal is therefore considered to be Schedule 2 development, the agent confirms this view in the conclusion of their screening opinion request.

The site is not within or adjacent to a "sensitive area"; therefore an Environmental Impact Assessment is not automatically required and we must consider whether the proposal is likely to have significant effects on the environment, having regard to the selection criteria at Schedule 3 of the Regs. In addition, the Government Guidance includes screening selection criteria and key issues which may also usefully be taken into account in considering whether there are likely to be significant environmental effects.

In relation to potential visual impact, one of the main factors listed in Schedule 3 , under Section 1 "characteristics of development", is the size and design of the whole development. As far as I can see, the only visual information submitted with the screening opinion request is the indicative site layout plan, which shows the proposed factory itself as a new building of notably large footprint area, but there is no further information giving details (or even indication) of height, massing, scale, appearance etc. There is also only brief mention of the potential for additional planting to the southern boundary, but this is not shown on the indicative layout plan and no further information about any proposed landscape/visual impact mitigation strategy is provided. On this basis, I would suggest that, strictly, there is presently insufficient information to enable us to reasonably adopt a screening opinion as to the likely visual effects and their significance.

That said, I am aware that we are also dealing with a pre-app request for this scheme (application ref PAD/2021/0046) which does include plans showing proposed elevations, levels, sections, axonometric views etc. These show the main element of the factory building as 115m long x 30m wide and up to around 14m tall above ground level, with a substantial attached additional element some 85m long x 13m wide and approximately 20m tall. The site layout plan submitted with the pre-app enquiry gives a very sketchy representation of vegetation along the south-western boundary of the site, although it is not denoted whether this intended to represent existing or potential/proposed new planting.

The present extensive facility at Advanced Proteins is a very large industrial complex sited in an elevated position in a rural area and prominently visible from a wide arc of the surrounding area

from north-west to east and from numerous receptor viewpoints of varying (including high) sensitivity and from close range to very long distance (eg Ipstones Edge, Morridge). The existing facility is also seen from several areas/representative viewpoints to the south including rural lanes and cross-field public rights of way; the proposed development would lead to the loss of an area of existing young woodland planting on the south-west side of the existing facility which is now becoming well-established and contributes to reduction of visual impact of the complex as existing in views from the south, and would result in a very large new building being sited adjacent to the visually open south-west boundary.

In many of these views, the new development would have cumulative visual impact in combination with the existing facility, this being another issue to be taken into account in regard to Schedule 3 screening selection criteria.

The areas from which the proposal would be visible are, generally, not designated landscapes with the exception of places such as Morridge which follows the boundary of the Peak District National Park (albeit the site is at significant distance from this boundary, around 7.5km at closest). Therefore the proposal is considered unlikely to have significant effects on geographical areas which are particularly sensitive to visual environmental effects (Section 2 of Schedule 3 of the Regs, dealing with location of development).

Government guidance on screening selection criteria suggests that Schedule 2, 7 Food Industry development may be more likely to have significant environmental effects where the overall operational area exceeds 20ha, which this current proposal clearly would not, although the associated key issues to consider are more to do with process and potential pollution than with visual impact. The guidance also suggests that Schedule 2, 10(a) Industrial Estate development may be more likely to have significant effects where it exceeds 20ha (again not in this case, although key issues more to do with traffic/emissions/noise than visual impact), and Schedule 2, 10(b) Urban Development on sites not previously intensively developed an EIA is more likely to be required sites exceeding 5ha (once again not applicable here, although key issues, which may affect strict application of the site area criteria, do include consideration of physical scale, which works in three dimensions and affects visual impact).

Section 3 of Schedule 3 deals with types and characteristics of potential impact, and specifically with regard to relevant sub-sections:

- 3(a), the size of the proposed building could give rise to a large magnitude of visual impact, and as noted above this could be over a wide geographical area;
- 3(b), the nature of the visual impact would reasonably be considered adverse;
- 3(e), the probability of the visual impact would be definite;
- 3(f), the visual impact would arise progressively during construction and be fully present on and from completion, being continuous rather than intermittent and regarded as permanent;
- 3(g), the proposal would have cumulative visual impact in conjunction with that of the existing facility, although it is acknowledged that conversely the siting adjacent to the existing extensive facility would mean that the proposal would not be seen in isolation as a completely new visual impact in previously unaffected views.
- 3(h), it is noted that the site layout would leave little physical space for substantial new structural landscaping, and given the scale of the proposed building (20m being towards the upper end of the size range that many trees achieve even at eventual maturity), its is

considered that potential to provide effective visual impact mitigation would be very limited.

On balance, I would consider that it is likely that the proposed development would have significant visual impact and on that basis it is suggested that strictly this would be a Schedule 2 development for which EIA should be required. However, if across the range of potential environmental effects it is only in respect of potential landscape and visual effects that the proposal is considered likely to have significant environmental effects in the context of a screening opinion request, then there may be an argument to suggest that this particular issue of landscape and visual impact could be acceptably considered by means of a comprehensive Landscape and Visual Impact Assessment submitted as a "standard" technical report as part of a planning application/supporting documents.

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