

Page 1 of 7  
09 August 2019  
150630\_T\_918090\_Reg 7 EIA Screening Opinion Request

Mr. Chris Nash  
South Derbyshire District Council  
Civic Offices  
Civic Way  
Swadlincote  
Derbyshire  
D11 0AH

Dear Mr Nash,

**THE TOWN & COUNTRY PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2017:  
ENVIRONMENTAL IMPACT ASSESSMENT – SCREENING OPINION REQUEST IN RESPECT OF  
TEMPORARY PERMISSION FOR BOREHOLE DRILLING WORKS AT DOVE VALLEY PARK, PARK  
AVENUE, FOSTON, DERBY.**

Stride Treglown act on behalf of PGFI III Limited in respect to land at Dove Valley Park (DVP), Derby. We are appointed in respect of land to the north of the existing industrial estate site and are instructed to progress an application seeking temporary permission for Borehole Drilling Works.

In accordance with the regulations, this request is accompanied by a site plan sufficient to identify the land in question. We include below a description of the proposed development, insofar as it is established at this stage in the planning/design process, and a description of the aspects of the environment most likely to be significantly affected by the development. In accordance with the principles enshrined within the 2017 regulations, where relevant, details of embedded mitigation are presented.

Stride Treglown Ltd has managed Environmental Impact Assessment (EIA) projects leading to the collation and submission of Environmental Statements (ES) for over 10 years.

To ensure completeness and quality an Environmental Statement (if required) must be prepared by competent experts. Although this does not apply to the screening and scoping stages we have included details of those involved in the collation of the screening opinion request in order to demonstrate that the decision to screen the development has been made based on sound technical knowledge and expertise.

The Royal Town Planning Institute (RTPI) take the view that chartered Town Planners who have suitable experience in preparing Environmental Impact Assessments are competent experts. In light of this, this Screening Request has been collated by Simon Lawson MRTPI (Associate Town Planner) and Graham Stephens MRTPI (Town Planning Director) within Stride Treglown.

Simon Lawson graduated from Coventry Polytechnic in Urban and Regional Planning in 1990 (BA (Hons)) before completing a Bachelor's Degree in Town Planning at Coventry University in 1992. Simon has been a Member of the Royal Town Planning Institute since the early 1990's and has over 20 years of experience and acts for a range of public sector and private development clients dealing with major projects.

Graham Stephens is a main Board Director at Stride Treglown Ltd. Graham holds a BA (Hons) in Town and Country Planning and achieved a distinction in his Bachelor of Town Planning (BTP Hons), both at the University of the West of England.

Graham has been a Member of the Royal Town Planning Institute since 1995 and has over 25 years of planning experience in a range of planning projects, leading multi-disciplinary teams on complex strategic and masterplanning commissions and acting as project coordinator for Environmental Statements, following EIA.

In accordance with the provisions of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (hereafter referred to as 'the regulations'), this letter constitutes a request under Regulation 6 for South Derbyshire District Council, as the relevant planning authority, to adopt an Environmental Impact Assessment Screening Opinion.

Part 2, Regulation 6 (2) states:

A request for a screening opinion in relation to an application for planning permission shall be accompanied by—

- a) A plan sufficient to identify the land;
- b) A brief description of the nature and purpose of the development and of its possible effects on the environment; and
- c) Such other information or representations as the person making the request may wish to provide or make.

We therefore have provided a brief overview of the site context, planning history and a section detailing the requirement for EIA thresholds (c). Following this a brief description of the nature and purpose of the proposed works (as per schedule 3 – selection criteria for screening schedule 2 development) and its effects on the environment (b). Finally. Attached to this letter is a location plan to identify the land subject to this screening opinion request (a).

## Site Location

The DVP site is located wholly within the South Derbyshire District Council authority area. It is located to the north of the existing Dove Valley Park industrial estate site and is located north of the A50 at its junction with the A511. The site is approximately 9 miles due south west of the centre of Derby.

The site measures approximately 12.26ha with a boundary which forms a loose square located to the east and north-east of the current Müller Dairy premises. Woodhouse Lane forms the northern boundary and Woodyard Lane the western boundary. Part of the site is intersected by a section of existing runway last used during WWII.

To the south of the site lies the first phase of Dove Valley Park subdivided into a number of distinct plots. Development has occurred in stages and as yet is not fully complete. Plots have been developed for a range of uses, including manufacturing, storage and distribution together with dairy facilities.

The site is not subject to any statutory designations (e.g. green belt, conservation area, AONB etc.) nor does it feature any designated heritage assets.

The plan accompanying this Screening Opinion identifies the location of the site within the immediate context.

## **The Proposed Development**

### *Policy Context*

The Development Plan for South Derbyshire District Council is the *South Derbyshire Local Plan Part 1*, adopted June 2016, together with those policies saved from the 1998 Adopted Local Plan. The *Local Plan Part 2* was adopted November 2017 and provides policy guidance on Development Management, together with further detail relating to housing allocations.

The *Local Plan Part 1* contains policies which allocate DVP as a strategic employment site.

*Policy E1 Strategic Employment Land Allocations 2011 – 2028* identifies the DVP for 19.27ha of new industrial and business development. The policies supporting text notes the success of the existing DVP development, principally relating to the connectivity provided by the A50 trunk road.

*Policy E5 Safeguarded Employment Sites – Dove Valley Park* states that the land to the north of DVP, measuring approximately 28ha, is “allocated for the development of large scale industrial and business units only, as defined by classes B2 and B8 of the Use Classes Order.”

The supporting text notes that, whilst sites included within Policy E1 can meet the bulk of the District’s needs, DVP together offer the opportunity to meet demand for what are referred to as “units of an exceptionally large scale for businesses in the manufacturing and logistic sectors, particularly in the A50 corridor.” It is for this reason that unit sizes are set as a minimum of 15,000 sqm.

## *Proposals*

Planning permission for a temporary period of 24 months is to be sought for borehole drilling works falling within the land outlined in red on the site plan submitted with the application. The land in question has a site area of 12.26ha and forms part of a larger parcel of land with the benefit of extant planning permission for B2 and B8 uses granted most recently under Local Planning Authority Application Reference: 9/2017/0816.

An application seeking temporary planning permission for borehole drilling works including ancillary infrastructure was granted approval on 26<sup>th</sup> April 2019 (under LPA application Ref: 9/2019/0205). This application was for preliminary investigation works and sought permission for a temporary period of 24 months to sink up to four boreholes for the purposes of testing and extracting ground water. Two of the boreholes are being implemented. The current application is to facilitate the relocation two of the previously approved boreholes; so as to ensure that the flow rates through the boreholes are not affected by localised dewatering.

The planning application included details of a site compound measuring 72m x 18m (which was to be secured with a 2.2m high hoarding).

There will be two phases of drilling. The first phase involves drilling a 650mm hole to a maximum depth of 80m, with the installation of a stand pipe. To protect the borehole a steel tube will be inserted and cemented in place. The hole will then be drilled further to a depth of approximately 150m with a diameter of 475mm. Further cemented barrier piping will be inserted. The third stage of drilling involves drilling to a depth of 185m with a diameter of approximately 311mm. The hole will be reinforced with locking tubes, and a fourth stage of drilling to a depth of 220m will take place. Finally, the hole will be deepened to a depth of 250m.

Following the completion of the drilling an experimental well will be established with the installation of stainless-steel tubes followed by the back filling of the hole to provide a hydraulic seal to prevent in flow.

The drilling will be carried out by a mobile drilling rig (a DSB 3/14 all-wheel drive 3 axle truck) of the sort identified on the drilling rig details sheet supplied with the application. The drilling will take place within the compound; which is to be re-sited for each borehole.

At the end of the process all of the drilling equipment and the site compound is to be removed.

## **Possible Effects on the Environment**

The purpose of the application is to secure planning permission to drill boreholes in order to test the ground water quality ahead of the construction of a water bottling plant. The application site falls within an area allocated for industrial development in the development plan and there is outline planning permission in place for B1, B2 and B8 uses across the application site. The application is for a temporary period of 24 months, and if successful would lead to the construction of a water bottling plant in accordance with the development plan.

## Noise

A Noise Assessment prepared by Acoustic Consultants Limited (ACL) is submitted with the application and models the impact of the noise from the drilling operation, the main source of which will be from the engine of the drilling rig which powers the auger motor. The noise is considered to be continuous in character without impulsive sounds that are common with other piling methods and potentially more intrusive. The submitted drawings show the location of the proposed boreholes. With regards to sensitive receptors (residential properties) these are located along the northern boundary of the site. The submitted drawings are indicative to show the boreholes located in the '*worse-case noise sensitive receiver*' locations.

To determine the noise levels across the site, noise modelling has been undertaken using a computer modelling package factoring in the plant noise data provided by the drilling rig data sheet. The modelling parameters included locating the boreholes in the '*worst-case noise sensitive receiver*' locations.

The modelling predicted noise level due to the borehole drilling operations indicate a noise level some -2dB to -9dB lower than the BS5228 threshold daytime noise limit of 65dB.

It is, however, recommended that a 1.8 metres-height noise control barrier be introduced at the north-west corner of the site to protect noise emissions occurring at the borehole location No.3.

## Other impacts

The proposal is not expected to give rise to any impact on natural resources, waste, other pollution and nuisances, population and human health, water resources, biodiversity (species and habitats), landscape and visual, cultural and archaeology, transport and access, land use, land stability, cumulative effects and transboundary effects.

## Summary

This EIA Screening Opinion Request has set out the context for proposed development at DVP, promoted in the context of the Adopted Local Plan Policy E5.

We have set out specific matters with regards to noise impacts which may be thought to arise and established that these are unlikely to be of a scale that necessitates assessment via EIA.

On the basis of the above, it is considered that there is a sound basis for adopting an EIA Screening Opinion that concludes that development, proposed in accordance with Policy E5, would not constitute EIA development.

We trust that this request provides you with sufficient information in order to be able to adopt a Screening Opinion and look forward to receiving this within the statutory 3 week period allowed for in regulations. If, however, you require any further information to aid your understanding and consideration of the site then please do not hesitate to contact me.

Yours sincerely,

**Simon Lawson MRTPI**

Associate Town Planner

For

STRIDE TREGLOWN LIMITED