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25 OCT 2019



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Ms Kerry Challoner
Planning
East Staffordshire Borough Council
P.O. Box 8045
Burton upon Trent
Staffordshire
DE14 9JG

Our Ref: CCB/30807/13

30th September 2019

Dear Ms Challoner

3807/13: HEALTHCARE AT HOME, FIFTH AVENUE, CENTRUM 100, BURTON UPON TRENT, DE14 2WS
PLANNING APPLICATION FOR THE ERECTION OF A MODULAR BUILDING USED FOR COMPOUNDING FOR THE CREATION OF PHARMACEUTICAL PRODUCTS (B1, B2, B8) WITH ANCILLARY PARKING.
TOWN & COUNTRY PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) (ENGLAND) REGULATIONS 2017 (AS AMENDED) SCREENING OPINION REQUEST

Proposal

The erection of a modular building used for compounding for the creation of Pharmaceutical products (B1, B2, B8) with ancillary parking.

We write to request a formal Screening Opinion regarding whether an Environmental Impact Assessment is required for the above property which is identified outlined in red on the attached plan.

Location

The site is located within the settlement boundary for Burton as defined in the Local Plan. The principle of new development on this site is therefore considered to be acceptable.

The site is located within the Centrum 100 Business Park which is a well-established industrial park, with a range of units surrounding the application site being used for B1, B2 and B8 use.

The site comprises a detached building erected in the late 1990s, which is currently occupied by Healthcare at Home Ltd. The building is accessed from Fifth Avenue, but sits adjacent to Parkway, a principal highway route, which runs through the centre of the Centrum 100 development. The building is served by an off- street car parking area.

To the north, south and west of the site are large industrial buildings occupied by Unipart Logistics; Waterstones Book Hub; Waterstone Book Warehouse and Kings Road Tyres. The access road and roundabout to the property is also located within this area. The Soufflet Malt UK site is located to the east. The A38 and A5121 is located near to the site.

Healthcare at Home Ltd, in addition to being the name of the applicant it is also the name of the building, is located off an estate road known as Fifth Avenue within the north-eastern area of Centrum 100. There are three units located off Fifth Avenue. Unipart Logistics and Waterstones Book Hub to the north and Healthcare At Home Ltd to the south. The main building at Healthcare At Home Ltd is used for B1, B2 and B8 uses and is the company's main pharmaceutical centre.

The site is rectangular in shape and currently has a large building located centrally. Parking and areas of hard standing are located surrounding the building. The site is flat and defined by shrubs and trees located on the boundary.

We request a formal EIA screening opinion in accordance with Regulation 5 of the Town & Country Planning (Environmental Impact Assessment) Regulations 2017. The Screening Opinion seeks to ascertain whether the proposal described in this letter constitutes an Environmental Impact Assessment (EIA) development.

In accordance with Regulation 6 of the EIA Regulations, this request for screening contains:

- A plan sufficient to identify the land
- A brief description of the nature and purpose of the development and its possible effects on the environment; and
- Additional information relevant to this EIA Screening Request.

It is our opinion that this type of development could fit within category 2. Having regard to the wording in the Regulations the purpose of this request is to seek the Council's confirmation under regulation 5 that the scheme does not require an EIA.

The Proposed Development

The proposed development is for the erection of a modular building used for compounding for the creation of Pharmaceutical products (B1, B2, B8) with ancillary parking.

The planning application will be accompanied by the following documents:

- Planning Application Form and Certificates
- Site Location Plan drawing no. FC1 @ 1:1250
- Block Plan drawing no. FC2 @ 1:500
- Elevation Drawings – Section Modular Building drawing no: 21521
- Internal Layout drawing QD27040r1
- Parking Plan drawing no. FC2 @ 1:500
- Design and Access Statement
- Parking Statement
- Standard Section & Details Internal Column Construction drawing no. S1/11/04

EIA Screening

In determining whether the development proposals constitute EIA development consideration should be given to the following:

The proposed development does not fall within Schedule 1 of the EIA regulations however it does fall within Class 6(b) – Chemical industry; Production of pesticides and pharmaceutical products, paint and varnishes, elastomers and peroxides of Schedule 2 of the 2017 EIA Regulations identified in Column 1.

In order to identify, in broad terms, the type of scale of Schedule 2 development which is likely to be a candidate for EIA, Environmental Impact Assessment of the Planning Practice Guidance should be referred to. Annex: Indicative Screening Thresholds (paragraph:057 Reference ID: 4-057-20140306 and 0:58 Reference ID: 4-058-20150326)

Development type	Schedule 2 criteria and thresholds	Indicative criteria and threshold	Key issues to consider
6. CHEMICAL INDUSTRY			
(b) Production of pesticides and pharmaceutical products, paint and varnishes, elastomers and peroxides;	The area of new floorspace exceeds 1,000 square metres.	Operational development covers a site of more than 10 hectares. Smaller developments expected to give rise to significant discharges of waste, emission of pollutants or operational noise.	i) development involves a process designated as a 'scheduled process' for the purpose of air pollution control; (ii) the process involves discharges to water which require the consent of the Environment Agency; (iii) the installation would give rise to the presence of environmentally significant quantities of potentially hazardous or polluting substances; (iv) the process would give rise to radioactive or other hazardous waste; or (v) the development would fall under Council Directive 96182/EC on the control of major accident hazards involving dangerous substances (COMAH) ¹ .

We have assessed the proposal against these criteria and conclude that the site does not meet any of the thresholds set out in the Planning Practice Guidance Annex: Indicative screening thresholds. The proposed development site is not more than 1,000 sqm and the operational site is not more than 10 hectares. Although a smaller development the site will not give rise to significant discharges of waste, emission of pollutants or operational noise.

Although we consider the proposed development does not constitute a development that requires an EIA we will provide additional information to enable the Council to make an appropriate decision.

Characteristics of development

Size of the development

As stated above, the site is located within the Centrum 100 Business Park which is a well-established industrial park, with a range of units surrounding the application site being used for B1, B2 and B8 use.

The site comprises a detached building erected in the late 1990s, which is currently occupied by Healthcare at Home Ltd. The building is accessed from Fifth Avenue, but sits adjacent to Parkway, a principal highway route, which runs through the centre of the Centrum 100 development. The building is served by an off-street car parking area.

The site is rectangular in shape and currently has a large building located centrally. Parking and areas of hard standing are located surrounding the building. The site is flat and defined by shrubs and trees located on the boundary.

The wider site area is approximately 3.02 acres however the proposed development includes the erection of one modular building which will be approximately 210 sqm with ancillary parking.

The building will be approximately 3.585m in height; 21m in length and 10m in width. The proposed modular unit will be used for compounding for the production of pharmaceutical medicines.

Additional parking in the form of 21 parking bays will be provided to support the proposed development. This will be located in the north east of the site, adjacent to the access point.

The accumulation with other development

In accordance with guidance in Circular 02/99 Environmental Impact Assessment, cumulative development constitutes existing and approved development. Paragraph 46 of the Circular states:

"The local planning authorities should always have regard to the possible cumulative effects with any existing and approved development."

We understand that there are no live planning applications in the area that would have a cumulative effect with our clients proposed development.

Our understanding is all applications with planning permission surrounding the site have been implemented and will be taken into consideration as the above application is considered during the planning application process.

As stated, the site is located centrally within an industrial park. Within approximately 500 metres of the site is the A38, A5121 and a Major Sustainable Urban Extension (SUE) located to the west of Centrum 100. In addition to this there are allocated development sites within the adopted Shobnall Neighbourhood Plan (Site 1: Industrial units on Shobnall Road (between Henderley Court and Shobnall Fields, facing Marston's Brewery): redeveloped for leisure and sports uses; Site 4: The Yard (Shobnall Skip Hire) / Staffordshire County Highways Depot: commercial office and leisure uses; and Site 8: Former industrial premises at Wellington Road) this allocated site will be focused on employment and commercial uses.

All of the above have been deemed suitable, by their designation, to be appropriate land uses adjacent to Centrum 100 and the existing B1, B2 and B8 uses.

We do not consider the proposed development would have any impact on any other development currently operating or proposed.

Use of natural resources

The proposed development will be constructed to high quality modern standards and will be energy efficient. All buildings will be constructed in accordance with prevailing building regulations.

The proposed development will include a modular building brought onto site. The parking will be in a graded recycled or quarry stone on a civil engineering membrane, which will be compacted. The top surface will be Trent Brown Gravel at approximately 30mm in depth. The colour and type of gravel will match that of existing gravel used throughout the site.

There will be no abnormal use of natural resources beyond those potentially required to deliver the proposed development and it is unlikely to result in the use of natural resources that are considered to be in short supply. The development will not result in the depletion of any natural resources.

The production of waste

The development will not produce levels or types of waste greater than that normally associated with a compounding for the creation of pharmaceutical products development of this scale.

Waste management facilities are currently in place. The proposed development will not require any additional facilities. All waste is stored and removed off site in accordance with the relevant licenses in place for the main building.

The production of waste will be dealt with through regular collection by a suitable contractor and Healthcare at Home Limited will be encouraged to recycle in line with up-to-date Council objectives and arrangements where it is appropriate to do so. The production of waste is not sufficient or of a particular significance for the purpose of requiring an EIA.

Pollution and nuisances

The new development is very unlikely to give rise to any significant levels of pollution or nuisance. Adequate separation distances have been incorporated into the layout to prevent the proposed development impacting on neighbouring sites and vice-versa.

The site is located within an industrial area and therefore the proposal is appropriately located. The proposed development will result in a highly monitored and controlled environment and will not have a negative impact or result in unacceptable levels of pollution or nuisances.

The risk of accidents, having regard in particular to substances or technologies used

The proposed development will be for compounding for the creation of pharmaceutical products to fit the unique needs of patients. The requirement of a compounding facility is essential ensuring Healthcare at Home can continue to deliver patient care. As part of the intended use, there will be the requirement to use some substances in the compounding unit. This will include flammable liquids for example denatured ethanol, industrial methylated spirits (IMS) or isopropyl alcohol (IPA) and carcinogenic products (cytotoxics). However, the use of these products would not exceed the lower thresholds as set out in Schedule 1 parts 2 and 3; or Schedule 1 parts 1 and 2 of the Control of Major Accident Hazards Regulations 1999 and The Control of Major Accident Hazards Regulations 2015 respectively.

Due to the nature of the development and the highly trained professionals who would be employed, the proposed development will result in a highly monitored future use in a controlled environment and will not have a negative impact or result in risk of accidents, having regard in particular to substances or technologies used. All activity will be in line with the relevant national standards. These controls are already in place on site.

Location of development

Schedule 3 advises that the environmental sensitivity of geographical areas where development is proposed must be considered, having regard to the following.

The existing land use

The site is currently occupied by the applicant. Healthcare at Home, Fifth Avenue, Centrum 100 comprises a detached large building erected in the late 1990s. This building is located fairly centrally in the site. Parking and areas of hard standing are located surrounding the building. The site is flat and defined by shrubs and trees located on the boundary. The site is occupied.

The position of the proposed building will be located on an area which is currently gravel. The remainder of the site is predominantly hard landscaped, considered previously developed land.

The relative abundance, quality and regenerative capacity of natural resources in the area

The proposed development is ancillary to the current operations occurring on site by Healthcare at Home Ltd. There is a requirement for the building to be positioned in this location, adjacent to their existing activities.

The parking area will be in a graded recycled or quarry stone on a civil engineering membrane, which will be compacted. The top surface will be Trent Brown Gravel at approximately 30mm in depth. The colour and type of gravel will match that of existing gravel used throughout the site.

The finished floor materials used will be a permeable surface therefore allowing for soak away drainage.

The provision of this building as a compounding unit will allow Healthcare at Home Ltd to continue providing doses of treatment for patients requiring chemotherapy to manage cancer. The majority of cancer medicines need to be prepared in a compounding unit as they need to be sterile and each patient has a different dose. Many NHS centres have insufficient funds to invest in maintaining their compounding unity facility, this has resulted in a national shortage of compounding unit providers.

The proposed modular building for compounding is a critical operation for Healthcare at Home as the compounding unit based in Burton upon Trent NHS would be used to prepare medicines for patients to have treatment across the UK. This will provide more capacity in the UK network of compounding units.

This proposed building is imperative to the Healthcare at Home Ltd business and its work with the NHS.

We do not consider the proposed development will not result in the depletion of natural resources in the area and will not result in the use of undeveloped land.

The absorption capacity of the natural environment

There would be no impact on wetlands; coastal zones; mountain and forest areas or parks; areas designated by Member States pursuant to Council Directive 2009/147/EC on the conservation of wild birds and Council Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora; areas in which the environmental quality standards laid down in EU legislation have already been exceeded; densely populated areas; or landscapes of historical, cultural or archaeological significance.

The site is located within an area defined as National Forest and located outside but nearby to an area identified as Flood Zone 2 on Inset No1: Burton and District plan of the East Staffordshire Borough Council adopted Local plan 2012-2031.

Although located within an area defined as National Forest, as stated above, the site is located within a well-established industrial/ business park where there is no forest present. The proposed development will not result in the removal of any trees.

Due to the above, no negative impacts upon such designations are anticipated as a result of the proposed development.

The site is located centrally within an industrial park. Within approximately 500 metres of the site is the A38, A5121 and a Major Sustainable Urban Extension (SUE) located to the west of Centrum 100. In addition to this there are allocated development sites within the adopted Shobnall Neighbourhood plan (Site 1: Industrial units on Shobnall Road (between Henderley Court and Shobnall Fields, facing Marston's Brewery): redeveloped for leisure and sports uses; Site 4: The Yard (Shobnall Skip Hire) / Staffordshire County Highways Depot: commercial office and leisure uses; and Site 8: Former industrial premises at Wellington Road) this allocated site will be focused on employment and commercial uses.

All of the above have been deemed suitable, by their designation, to be appropriate land uses adjacent to Centrum 100.

We do not consider the proposed development would have any impact on any other development currently operating or proposed.

The site is located within an industrial park and the proposal is for a use deemed appropriate for this location and therefore will not produce any significant or undesirable impacts upon the amenity of existing surrounding occupiers.

There are no other buildings or structures of great historical or architectural significance within or adjacent to the application site.

Characteristics of the potential impact

Schedule 3 further advises that the potential significant effects of the development must be considered in relation to those matters raised above and having regard, in particular to the following.

- The extent of the impact (geographical area and size of the affected population)
- The trans frontier nature of the impact
- The magnitude and complexity of the impact
- The probability of the impact
- The duration, frequency and reversibility of the impact

The extent of the impact of the proposed development is likely to be localised, limited to the site itself. The site is well contained and defined by existing boundaries, development and infrastructure.

To the north, south and west of the site are large industrial buildings occupied by Unipart Logistics; Waterstones Book Hub; Waterstone Book Warehouse and Kings Road Tyres. The access road and roundabout to the property is also located within this area. The Soufflet Malt UK site is located to the east. The A38 and A5121 is located near to the site.

We do not consider these areas will be affected by the proposal. The proposed scheme will be located within the existing boundaries of the wider site in which it is ancillary to, and an appropriate distance from neighbouring buildings to prevent the possibility of undesirable impacts on surrounding occupiers.

Good construction and site operations will ensure minimal effects on the local environment during the construction phase. Disruption will be of a temporary nature and be offset by the significant long-term, post-construction benefits of the development such as the delivery of much needed compounding for the creation of pharmaceutical products, as set out in this letter.

We do not consider the vehicle movements from the site would create a negative impact on the highway network or result in any damaging environmental effects.

An additional 21 parking spaces have been provided as ancillary to the proposed development, however, it is highly unlikely that all of these spaces will be used.

The magnitude and complexity of the impact can be assessed through the normal planning application process. It is unlikely that any issues will arise which cannot be dealt with by appropriate mitigation measures which is not unusual for a minor application.

The principles of development of the site has been tested through pre-application discussions with the District Council where it was found that the site is located within the settlement boundary for Burton as defined in the Local Plan. The principle of new development on this site is therefore considered to be acceptable. It will also be justified through the supporting information submitted with the application.

The overarching principle of design is that the development will be simple in appearance and in keeping with the surrounding industrial buildings. The building's design will be appropriate for its proposed use and location.

The most significant impact of the development could be considered to be in connection with transport and access to the site and the pharmaceutical products produced on site. We consider the proposed development can be assimilated into the local highway network with no damaging environmental effect due to the number of jobs that are to be created by the development. In relation to the pharmaceutical products, the proposed development will result in a highly monitored future use in a controlled environment and will not have a negative impact or result in risk of accidents, having regard in particular to substances or technologies used. All activity will be in line with the relevant national standards and licences. These controls are already in place on site. As a result, we do not consider the development will create any unusually complex or potentially hazardous environmental effects.

There will be limited impact during the construction phase of the development; however, this will be temporary and will cease upon completion of the development. It will unlikely impact on any of the surrounding occupiers. The most likely source of impact during the construction phase will be construction traffic and noise. However, due to the nature of the modular building, it will be erected quickly therefore reducing levels of impact. Once in operation, it is not anticipated that the proposed use will result in source of impact such as noise or traffic movements that will negatively impact on neighbours of the site.

Any impacts created by the development can be mitigated by appropriate measures. The development is relatively inoffensive and acceptable in this location given its scale (being much smaller than the existing building) and not being sited in a particularly prominent location, with likely neutral or negligible impact on the environment in this instance.

The development will be a modular building that could be removed from site if desired.

Conclusion

The site as a Schedule 2: Chemical industry project is not large enough to automatically trigger EIA; however as has been demonstrated through this letter, the development proposals have been screened against the relevant provisions of the EIA Regulations 2017 (as amended).

The site is large enough to accommodate the proposed development without impact on the surroundings including the provision of additional off street parking. The scheme will be constructed to high quality modern standards and include appropriate mitigation measures, where appropriate, to ensure that any identified impacts can be satisfactorily mitigated.

The proposals represent an appropriate use of the site given surrounding land uses, and the wider settlement area.

It is our opinion that any potential impacts of the development can be robustly assessed through the information submitted with the planning application.

Having considered the scope of environmental issues associated with the development of the site and its relative low sensitivity, no impacts have been identified that are so significant to require an EIA to be undertaken.

We trust that the information contained within this letter provides East Staffordshire Borough Council as the Local Planning Authority with sufficient information to confirm that the proposals are not EIA development requiring a formal Environmental Statement and look forward to receiving your formal written response from a duly authorised officer and would be grateful if you could set out the reasons for your decision. Please confirm that your formal screening opinion will be placed on Part 1 of the Planning Register.

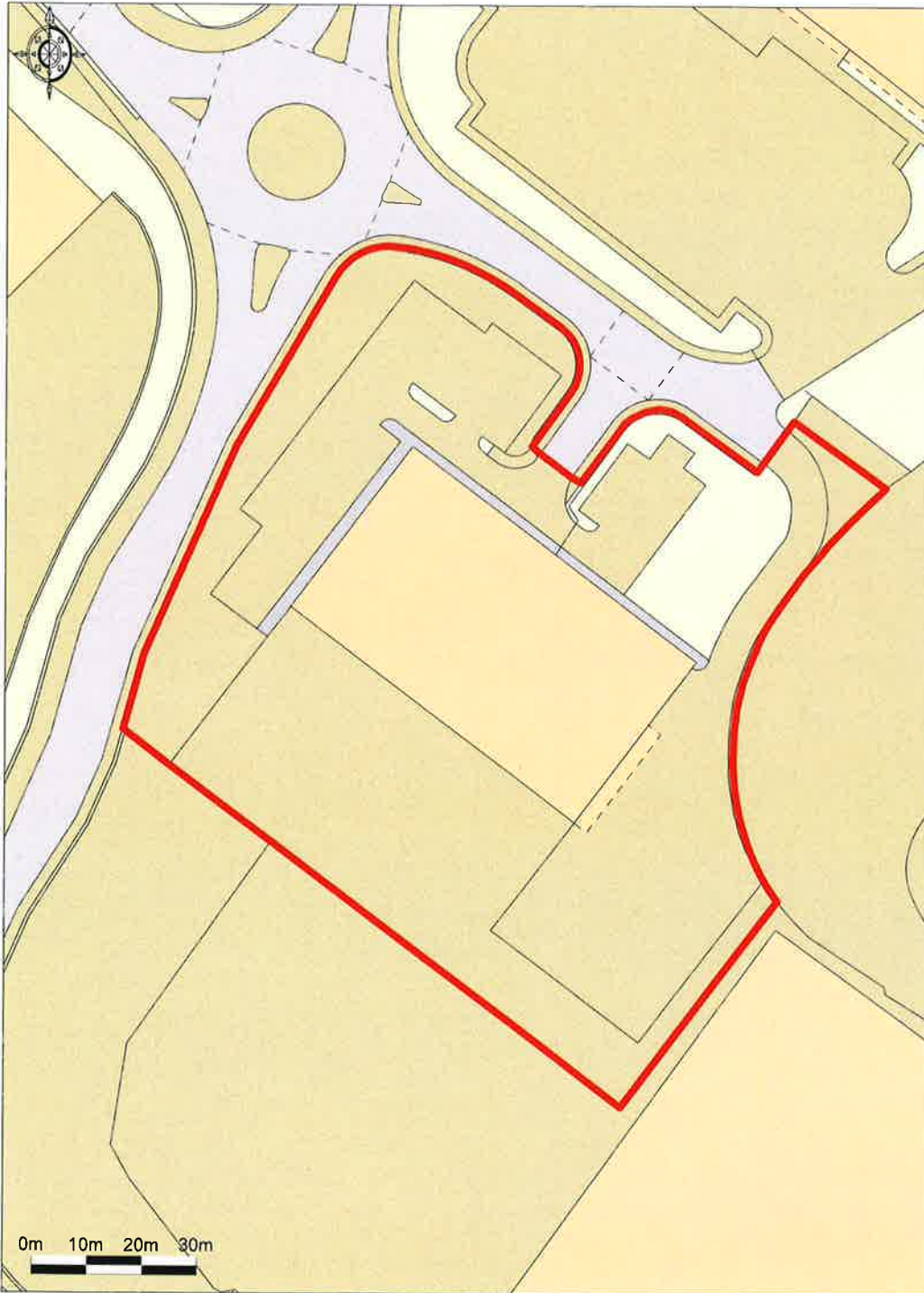
We are anxious to ensure that we comply with Regulations 5(5) and therefore await notification of the Council's Screening Opinion within three weeks of the date of receipt for this request.

Please do not hesitate to contact us should you be unable to comply with our request or require any further information.

Thanking you in anticipation.

Yours sincerely,

Healthcare At Home, Fifth Avenue, Centrum 100 , Burton On Trent, DE14 2WS



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Licence number 100023412. Plotol Scale - 1:1250

FC1: Location Plan

P/19/01203

