

EIA Screening Opinion Statement of Reasons

Regulation 5.(5) of The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended)

Part 1	Application Details
a	Application Number:
	23/1178/SO
b	Site Address:
	Southgate, Exeter, EX2 4HZ
c	Brief description of development:
	Re-development of site consisting of up to 200 dwellings in high rise blocks and rerouting of the existing highway
d	Area of development/works/new floorspace (as appropriate):
	1.5 ha
e	Has sufficient information been provided, i.e. a plan sufficient to identify the land, a description of the development (including its physical characteristics, sensitivity of the location, aspects of the environment likely to be significantly affected, likely significant effects from residues/emissions, production of waste and use of natural resources), and such other info/refs developer wishes to provide, including features/measures envisaged to avoid/prevent significant adverse effects – for approval of RM/conditions, also sufficient info to identify original permission, and likely significant effects not previously identified? <i>(If no, notify in writing what additional info required)</i>
	<div style="display: flex; justify-content: space-between;"> Yes/No Yes </div>
f	Subsequent applications
(i)	Approval of reserved matters or conditions? <i>(If no, go to Part 2)</i>
	<div style="display: flex; justify-content: space-between;"> Yes/No No </div>
(ii)	If YES to f(i), enter the description of development subject of the related planning permission:
	N/A
(iii)	If YES to f(i), was an Environmental Statement submitted with the application for the related planning permission? <i>(If no, go to Part 2)</i>
	<div style="display: flex; justify-content: space-between;"> Yes/No N/A </div>
(iv)	If YES to f(iii), is the environmental information adequate? <i>(If no, serve notice requesting further information in writing) – go to Part 3</i>
	<div style="display: flex; justify-content: space-between;"> Yes/No N/A </div>

Part 2	EIA Details
a	Schedule 1
(i)	Is the proposed development 'Schedule 1' development as described in Schedule 1 of the EIA Regulations (as amended)?
	<div style="display: flex; justify-content: space-between;"> Yes/No No </div>
(ii)	If YES, under which description of development (1-24)?

		N/A	
b		Schedule 2	
(i)	Is the proposed development described in Column 1 of Schedule 2 of the EIA Regulations (as amended)?		
	Yes/No	Yes	
(ii)	If YES, under which description of development in Column 1 (1-13)?		
	10(b)(ii)		
(iii)	If YES to b(i), is the proposed development 'Schedule 2' development, as any part of it will be carried out within a 'sensitive area', i.e. SSSI, scheduled monument or European site (NB. the other areas do not apply to Exeter)?		
	Yes/No	Yes	
(iv)	If YES, which area?		
(v)	Protected European Marine Site: Pebblebeds and Exe Estuary and in close proximity to the Roman Wall Scheduled Ancient Monument		
(vi)	If YES to b(i), is the proposed development 'Schedule 2' development, as the applicable thresholds/criteria in Column 2 are exceeded/met?		
	Yes/No	Yes	
(vii)	If YES, which applicable threshold/criteria?		
	10(b)(ii) Urban Development project of more than 150 dwellings		
	Screening for Schedule 2 development taking into account information provided by the applicant, the results of any relevant EU environmental assessment and Schedule 3 criteria that are relevant to the development – if YES to b(iii) or b(v)		
Questions (taken from Planning Inspectorate screening checklist 2017)		Answer and explanation of reasons (Yes/No or Not Known or N/A)	Is a significant effect on the environment likely taking into account the magnitude & spatial extent (including population size affected), nature, intensity & complexity, probability, expected onset, duration, frequency and reversibility of the impact, as well as cumulative impacts with other existing/approved development and the possibility of effectively reducing the impact? (Yes/No or Not Known or N/A)
		<i>Briefly explain answer and, if applicable and/or known, include name of feature and proximity to site</i>	<i>If No, state any features and measures envisaged to avoid, or prevent what might otherwise have been, significant adverse effects on the environment</i>
1. Natural Resources			
1.1	Will construction, operation or decommissioning of the	Yes - Levelling work and creation of dwellings.	No. Site slopes down north to south and will need to be levelled at points to allow

	project involve actions which will cause physical changes in the topography of the area?		the development. This is proposed to be stepped and will respect the existing topography in linking with the surrounding area to the north, east, south and west.
1.2	Will construction or operation of the project use natural resources above or below ground such as land, soil, water, materials/minerals or energy which are non-renewable or in short supply?	Yes – natural resources will be used during the construction and operation of the development, including land, soil, water and non-renewable energy resources.	No – the project will not use natural resources that are in significant short supply. Whilst some resources are non-renewable, none are likely to be unusual for a development project such as this and sustainable design and construction methods will be required in accordance with Exeter Core Strategy Policy CP15.
1.3	Are there any areas on/around the location which contain important, high quality or scarce resources which could be affected by the project, e.g. forestry, agriculture, water/coastal, fisheries, minerals?	No	N/A
2. Waste			
2.1	Will the project produce solid wastes during construction or operation or decommissioning?	Yes – Construction waste. The site is also within a DCC Waste consultation zone	No - There is no significant contamination and the level of waste will be in accordance similar developments in the city. A Waste Audit Statement will be required via condition to ensure waste is managed in a sustainable manner.
3. Pollution and Nuisances			
3.1	Will the project release pollutants or any hazardous, toxic or noxious substances to air?	Yes - there is potential during the construction phase.	No – There is not considered to be a high level of risk and contamination reports and appropriate remediation can be dealt with at application stage and via condition. A Waste Audit Statement will be required in accordance with the policies of the Waste Planning Authority – Devon

			<p>County Council, to ensure that construction wastes and operational wastes are managed in a sustainable manner.</p> <p>The is within Air Quality Monitoring Area, but is proposed to be car free and will not have significant impacts on this.</p> <p>Part of the existing site is a car park, which will be removed and will see a significant reduction in on-site movements in this area.</p> <p>The highway reconfiguring will see careful assessment at application stage by DCC Highways to ensure there is no significant increase in traffic impacts to limit the amount of idling vehicles.</p>
3.2	Will the project cause noise and vibration or release of light, heat, energy or electromagnetic radiation?	Yes – noise and vibration from vehicles/machinery during construction; light pollution from indoor rooms and external street/garden lighting when dwellings occupied.	<p>No – Demolition and construction impacts will be temporary and mitigated through measures in a Construction Method Statement.</p> <p>Lighting and amenity impacts are considered to be in keeping with development of this scale and appropriate mitigation can be dealt with at application stage if required e.g. dark corridors for bats or positioning of external lighting.</p>
3.3	Will the project lead to risks of contamination of land or water from releases of pollutants onto the ground or into surface waters, groundwater, coastal waters or the sea?	Yes - Potential impacts during construction phase and occupation. Seabrook Watercourse runs through the wider site.	<p>No - Contamination Report assessment and remediation prior to work commencing</p> <p>Construction Management Plan can be required to ensure suitable protection during construction.</p> <p>Design of suitable drainage system to prevent pollutants or contamination following occupation.</p>

3.4	Are there any areas on or around the location which are already subject to pollution or environmental damage, e.g. where existing legal environmental standards are exceeded, which could be affected by the project?	No - None noted	No – Whilst the demolition and construction phases of the development has the potential for impacts, there is no noted significant risk and therefore any risks can be appropriately mitigated at the application stage.
4. Population and Human Health			
4.1	Will there be any risk of major accidents (including those caused by climate change, in accordance with scientific knowledge) during construction, operation or decommissioning?	Yes – risk of accidents to construction workers during the construction phases of the development.	No – The risks are not considered to be significant provided the proper controls are in place via conditions placed during the application stage. Any accidents are likely to be confined to the site.
4.2	Will the project present a risk to the population (having regard to population density) and their human health during construction, operation or decommissioning? (for example due to water contamination or air pollution)	Yes – dust/particulates during construction could present a risk to the population of residential areas to the west and southeast. Site is within an Air Quality Monitoring Area.	No – this impact will not have a significant effect on the environment as it can be controlled through measures in a Construction Method Statement required via condition at application stage. Development will be car-free and not create significant increase on vehicle movements and the Air Quality Monitoring Area. The highway reconfiguring will see careful assessment at application stage by DCC Highways to ensure there is no significant increase in traffic impacts to limit the amount of idling vehicles.
5. Water Resources			
5.1	Are there any water resources including surface waters, e.g. rivers, lakes/ponds, coastal or underground waters on or around the location which could be affected by the project, particularly in terms of their volume and flood risk?	The site is within Flood Zone 1 The site is within the zone of influence of - Exe Estuary Site of Special Scientific Interest (SSSI) - Exe Estuary Special Protection Area - East Devon Pebblebed Heaths Special Area of	No – The site is within Flood Zone 1 and it is considered that suitable sustainable urban drainage can be agreed at application stage to limit flood risk impacts to the surrounding area. There is an existing mitigation process through CIL/S106 to deal with

		Conservation and Special Protection Area - Exe Estuary Ramsar site	impacts for the protected marine sites.
6. Biodiversity (Species and Habitats)			
6.1	Are there any protected areas which are designated or classified for their terrestrial, avian and marine ecological value, or any non-designated / non-classified areas which are important or sensitive for reasons of their terrestrial, avian and marine ecological value, located on or around the location and which could be affected by the project? (e.g. wetlands, watercourses or other water-bodies, the coastal zone, mountains, forests or woodlands, undesignated nature reserves or parks. (Where designated indicate level of designation (international, national, regional or local))).	Yes - Protected European Marine Sites of: - Exe Estuary Special Protection Area - East Devon Pebblebed Heaths Special Area of Conservation and Special Protection Area - Dawlish Warren Special Area of Conservation	No – There is an existing mitigation process set up for the protected marine sites. Other biodiversity impacts can be dealt with through surveys and mitigation at application stage.
6.2	Could any protected, important or sensitive species of flora or fauna which use areas on or around the site, e.g. for breeding, nesting, foraging, resting, over-wintering, or migration, be affected by the project?	Yes – See 6.1 above	No - See 6.1 above.
7. Landscape and Visual			
7.1	Are there any areas or features on or around the location which are protected for their landscape and scenic value, and/or any non-designated / non-classified areas or features of high landscape or scenic value on or around the	Yes – The site is located in the vicinity of key views outwards from the city centre to the landscape setting. The proposed height also has the potential to impact on views from outside the city of the city centre and the Cathedral.	No – The site has seen urbanisation and is allocated within the Core Strategy for development for housing, which are seeing for higher density in the city centre, which will need associated increases in height to accommodate. The overall height, massing and positioning of the

	<p>location which could be affected by the project? Where designated indicate level of designation (international, national, regional or local).</p> <p>(NB. See question 8.1 for consideration of impacts on heritage designations and receptors, including on views to, within and from designated areas.)</p>		<p>buildings will be a key factor however this is the case for any high-level development and as such it is considered to be appropriate to be dealt with at application stage.</p>
7.2	<p>Is the project in a location where it is likely to be highly visible to many people? (If so, from where, what direction, and what distance?)</p>	<p>Yes - The site is within a part of the city that has residential uses adjacent residential uses, public highways and paths.</p>	<p>No – See 7.1 above. The site will also form the southern gateway entrance to the city and will be expected to provide exemplar design at application stage.</p>
8. Cultural Heritage/Archaeology			
8.1	<p>Are there any areas or features which are protected for their cultural heritage or archaeological value, or any non-designated / classified areas and/or features of cultural heritage or archaeological importance on or around the location which could be affected by the project (including potential impacts on setting, and views to, from and within)? Where designated indicate level of designation (international, national, regional or local).</p>	<p>Yes - Site has high potential for archaeological remains. A number of listed buildings in the immediate surrounding area. Scheduled Ancient Monument of the City Wall to the east of the site.</p>	<p>No – The site is within an Area of Archaeological Importance and there is significant potential for remains to be found. It is considered that this can be dealt with through planning conditions and submission of initial exploratory work at application stage to assess the scheme. In relation to listed buildings and the SAM, the level of impact will be dealt with through the final massing and layout of the scheme which it is considered acceptable to deal with at application stage.</p>
9. Transport and Access			
9.1	<p>Are there any routes on or around the location which are used by the public for access to recreation or other facilities, which could be affected by the project?</p>	<p>Yes – Site is on key gateway point connecting all directions with the city centre and the wider area of Exeter Quay and canal, Topsham Road and Magdalen Street.</p>	<p>No – The existing connections are overly complex for pedestrians and this scheme proposes to improve the pedestrian/cycle connectivity through this key access node through</p>

			creation of clear routes, increasing car-free routes and improving the position of highway crossings. These matters can be assessed fully at application stage.
9.2	Are there any transport routes on or around the location which are susceptible to congestion or which cause environmental problems, which could be affected by the project?	Yes – Western Way leading to Exe Bridges sees heavy congestion and the site is within an Air Quality Monitoring Zone.	No – The primary impact is congestion from the Exe Bridges junction with Alphington Road, backing up Western Way. The initial design has been developed alongside DCC Highways and is designed to improve the existing gyratory and access routes. Signal control will be carefully designed to prevent increase in idling vehicles or additional delays.
10. Land Use			
10.1	Are there existing land uses or community facilities on or around the location which could be affected by the project? E.g. housing, densely populated areas, industry / commerce, farm/agricultural holdings, forestry, tourism, mining, quarrying, facilities relating to health, education, places of worship, leisure /sports / recreation.	Yes – Dwellings to the north and south, as well as commercial uses to the north and east. The site forms part of the southern route into the city.	No – The site is a brownfield site on the edge of the city centre and is allocated in the emerging Exeter Plan for development. Impacts on the surrounding area will primarily be during the construction phase and this can be mitigated where possible through the use of conditions and management plans.
10.2	Are there any plans for future land uses on or around the location which could be affected by the project?	No – Site is allocated in emerging Exeter Plan.	N/A
11. Land Stability and Climate			
11.1	Is the location susceptible to earthquakes, subsidence, landslides, erosion, or extreme /adverse climatic conditions, e.g. temperature inversions,	Not known	N/A

	fogs, severe winds, which could cause the project to present environmental problems?		
12. Cumulative Effects			
12.1	Could this project together with existing and/or approved development result in cumulation of impacts together during the construction/operation phase?	Yes – cumulative impact on Exe Estuary SPA; cumulative impacts of traffic generation during construction phase; cumulative impacts through surrounding developments.	No – The scheme proposes to improve traffic movements through the area and construction traffic can be controlled through conditions at application stage. In regard to the cumulative impact on Exe Estuary SPA, an appropriate contribution from CIL receipts and/or a financial contribution would be secured towards implementing the avoidance measures in the SE Devon European Sites Mitigation Strategy.
13. Transboundary Effects			
13.1	Is the project likely to lead to transboundary effects? (NB. The Regulations require consideration of the transboundary nature of the impact. Due to the England's geographical location the vast majority of TCPA cases are unlikely to result in transboundary impacts.)	No	N/A
c		Is the proposed development 'EIA development', as it is either Schedule 1 development or Schedule 2 development that is likely to have significant effects on the environment by virtue of its nature, size or location? (If yes, an Environmental Statement is required)	
		Yes/No	No.

Part 3	Summary and Conclusion
a	Schedule and category of development:
	Schedule 2, 10(b)(ii) Urban Development project of more than 150 dwellings
b	Conclusions – according to EIA Regulations Schedule 3
	The proposal is for up to 200 dwellings and reconfiguration of the surrounding highway network at the Southgate.

	<p><u>Characteristics of Development (Q1-4)</u></p> <p>The development is more than 150 dwellings and 1.5 hectares in size, meeting the Schedule criteria.</p> <p>Whilst the scale of development is likely to be higher than that of the surrounding area, the location of the site on the edge of the city centre alongside the aims of the local plan to increase density means that such a change is acceptable, subject to the final design at application stage.</p> <p>Whilst there will be an element of pollution, noise and other risks through the proposal it is considered that these elements are not significant in EIA terms and can be addressed through the planning application process.</p> <p><u>Location of Development (Q5-11)</u></p> <p>The site is within Flood Zone 1 and within the SSSI Impact Risk Zone and SPA Recreational Zone Buffer of the Exe Estuary.</p> <p>The site is on the edge of the city centre and is appropriate for a high-density development such as this. There are key views from the site and surrounding area of the hills surrounding Exeter (Landscape Setting Zone), however the overall design at application stage will be able to take into account the key viewpoints such as from the end of Southernhay. The site is likely visible from the wider area due to the height, however this is common for taller developments in the city centre due to the topography rising towards the city centre and cathedral. It is therefore not considered to be out of character and such potential impacts can be fully assessed at application stage.</p> <p>The traffic generated by the development is not considered to be significant during the construction phase of development. The scheme will be car-free development and will see an existing car-park removed which will reduce on-site movements on this part of the site.</p> <p>The site is surrounded by heritage assets being within an Area of Archaeological Importance, surrounded by listed buildings and with a Scheduled Ancient Monument to the west. It is considered that whilst there is the potential for significant impacts, these matters can be fully assessed through the planning application process to ensure the design, layout and appropriate archaeological work has been fully undertaken and taken into account.</p> <p>There is the potential for impacts to protected marine sites to the east, however the LPA has existing mitigation processes in place for development and mitigation will be sought through the established processes and therefore no significant environmental impact will be created.</p> <p><u>Types and Characteristics of the Potential Impact (Q12-13)</u></p> <p>The development is unlikely to have significant impact on the use of natural resources and the site is not designated as a contaminant risk. Whilst there is potential cumulative impact on the protected SSSI</p>
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	<p>Impact Risk Zone and SPA Recreational Zone Buffer of the Exe Estuary, these can be mitigated through the application phase.</p> <p>Given the overall nature and scale of the proposed development and the nature of the receiving environment it is considered that while there may be some impact on the area as a result of this development, it would not be of a scale with developments of this nature and are not likely to result in significant environmental effects.</p> <p>Given the surrounding urbanisation and city centre location and the matters set out in this assessment it is not considered that the development will not create significant environmental effects and all matters can be dealt with through appropriate mitigation at the application stage.</p>	
c	Is an Environmental Statement required?	
	No	
d	(Subsequent applications only) Was an ES submitted for the related PP and is the environmental information adequate for the current application for approval of RM/conditions?	
	N/A	
Case Officer	Chris Cummings	
Date	17 October 2023	