



**MANCHESTER  
CITY COUNCIL**

**Julie Roscoe  
Head of Planning**

Telephone: +44 (0)161 234  
4524

sue.wills@manchester.gov.uk

PO Box 532 Town Hall  
Manchester M60 2LA

Mr. Matthew Stocks,  
WSP,  
3 White Rose Office Park  
Millshaw Park Lane  
Leeds  
LS11 0DL

Our reference: 132850/DEM/2022

Your reference:

Date 8 April 2022

Dear Matthew Stocks,

**TOWN AND COUNTRY PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT)  
(ENGLAND) REGULATIONS 2017**

**FORMAL SCREENING REQUEST FOR ENVIRONMENTAL IMPACT ASSESSMENT  
'SCREENING' UNDER PART 2 REGULATION 6**

**Former Saxon Street , Gas Holder, Saxon Street , Manchester**

**SCREENING OPINION ADOPTED BY MANCHESTER CITY COUNCIL**

In coming to a formal opinion on whether an Environmental Impact Assessment (EIA) is required to support the proposed development, Manchester City Council, as Local Planning Authority, has taken into account the supporting information contained within:

Prior Notification Statement; Outline Demolition Methodology ;Ecological Appraisal; Asbestos Demolition Survey; Asbestos Survey report; Figure 1 rev.P01 Site Location plan; Figure 2 rev.01 Existing Site Layout plan and Structures to be demolished plan; and Figure 3 rev.01 Final site conditions plan.

Demolition works fall within the scope of the EIA Directive, and therefore it is necessary to consider whether the demolition project is likely to have significant environmental effects, and I outline my response below .

The proposal relates to the demolition of a structure and associated buildings which fall within category 3 Energy Industry (b) Industrial installation for carrying gas, steam and hot water of Schedule 2 of the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 2017. The site covers an area of approximately 9.707ha in total and therefore exceeds the 1 ha threshold set out in Schedule 2 Category 3 (b) of the EIA Regulations, and therefore is defined as a development likely to have significant effects on the environment by virtue of factors such as its nature size or location.

Within the Planning Policy Guidance (PPG), general considerations relating to the need for an EIA for Schedule 2 developments is identified within paragraph 18 of the guidance. This references the selection criteria in relation to Schedule 3 of the Regulations. These criteria must be taken into account in determining whether a development is likely to have significant effects on the environment. The criteria is as follows:

- i. Characteristics of Development (e.g. its size, use of natural resources, quantities of pollution and waste generated);
- ii. Location of Development (e.g. environmental sensitivity of geographical areas);
- iii. Characteristics of the potential impact (e.g. its magnitude and duration).

The Secretary of States view is that, in general, an EIA will be needed for Schedule 2 developments in three main types of cases, namely:

- i. For major developments which are of more than local importance;
- ii. For developments, which are proposed for particularity environmentally sensitive or vulnerable locations;
- iii. For development with unusually complex and hazardous environmental effects.

Below is a consideration as to whether an EIA is required to support this demolition application.

## **CONTEXT**

The proposed development site relates to land to the east of Bradford Road between Gleden Street and Saxon Street, with the Ashton Canal to the south of the site and a railway line to the east of the site . The Ashton Canal is a Grade A Site of Biological Importance. The site covers an area of approximately 9.707ha, and comprises a gas holder and associated buildings and hard-surfaced areas. The wider area comprises a mix of uses, including a public house ,industrial and commercial uses, and residential properties. The south eastern part of the site wraps around a live gas compound operated by Cadent. The above details demonstrate the character of the area within which the works would be situated.

The application relates to the demolition of an above ground, Type 37 guide frame gasholder with an I-section lattice girder, disused above ground pipework and 4no. ancillary buildings (boiler room, electrical intake room, brick store and store room).

It is understood that the gasholder was historically used to store gas at low pressure, with the stored gas used during periods of peak demand, and that developments in technology since the late 2000's has allowed greater storage of gas in the below ground gas network

rendering the gasholders redundant. The structures have been mothballed across the UK for over a decade, and none are connected to the live gas network.

Furthermore, it is noted that there is also a regulatory requirement from Ofgem to dismantle the gasholders by the end of the RIIO T2 period (2026), and National Grid's demolition programme is aligned with this regulatory target.

## **ASSESSMENT**

As detailed above, an assessment is provided, based on the three criteria within Schedule 3 of the regulations.

### **Characteristics of Development**

#### **Size of Development**

The scope of the works is to demolish the previously specified gas holder and associated buildings. The applicant has confirmed that the gas holder is redundant and has not been in active use for over 10 years.

The Outline Demolition Methodology and other reports and surveys that form part of the application details the scope of demolition works, equipment to be used to demolish the buildings premises and operations to be undertaken, together with confirmation that adequate precautions would be undertaken as required. An Asbestos survey of the structure and buildings confirms that asbestos is present within some of the existing structures and within debris on the site. A site specific 'Plan of Work With Asbestos Containing Materials', has been produced which details the method of safe removal and disposal of asbestos containing materials on the site, as part of the dismantling, in accordance with statutory guidelines and asbestos survey agreed with National Grid.

Further information in the submitted documents confirms that any waste generated from asbestos removal would be recorded and disposed of in accordance with the Hazardous Waste (England and Wales) Regulations, and in addition that the works comprises the removal of the holder and associated infrastructure to ground level. The concrete base will remain in-situ therefore no ground works are proposed. As the ground will not be broken by the dismantling works there are no ground contamination risks arising from the proposal.

Further information in these documents confirms traffic management, site set up and security, plant and equipment, management of services, environmental considerations, waste removal and emergency procedures.

#### **Cumulation with other development**

A screening opinion should be adopted on its own merits, and on the basis of what is being proposed. However, in assessing whether the effects of a development are likely to be significant, regard should be had to the possible cumulative effects with any existing or approved development. The development site is located in an area of change where there are likely to be other developments taking place in close proximity to each other, but these are localised and impacts arising are predictable and not significant in nature, and therefore does not require consideration by an EIA.

## Use of natural resources

The site is not a known area containing any natural resources. In addition, given the scale of the development, it is not believed that this would require the excessive usage of any natural resources in the demolition process.

There would be some use of water (for dust suppression with the site and highway) and fuel for demolition vehicles, but this is not considered to be of a level which would have serious environmental impacts and is only temporary for the duration of the demolition process.

## Production of waste

The demolition project is likely to produce an amount of waste in terms of internal strip out rubble and other materials. The production of waste would not be significant and would be mitigated through the proposed recycling and re-use of materials. Furthermore, the arrangements for the managed removal of asbestos, by a specialist contractor have been specified in accordance with the Outline Demolition Methodology.

Whilst there is an amount of waste to be generated at the site, it is not considered that the levels would give rise to a significant environmental impact of the development, would be localised in nature and predictable and is likely to be of no more than local significance, and therefore does not require consideration by an EIA.

## Pollution and nuisances

The demolition process will produce dust, noise and vibration from the works and use of machinery. Additional traffic will be present on the highway network from vehicles associated with the demolition process, particularly heavy goods vehicles, resulting in noise and emissions in the immediate area which would give rise to disruption to local residents and businesses for the duration of the construction period. These impacts will be temporary, and intermittent, but predictable in duration during the 7 month period of works.

Some noise impacts will inevitably occur through the implementation of demolition works. However, demolition work would be undertaken over an approximate 7 month period and contained within normal working hours, i.e., Monday-Friday: 08:00 – 17:30, with no work on weekends or Bank Holidays to minimise local disruption, and materials would be stockpiled on site to enable timed vehicle movements which avoid local peak traffic and other highway sensitivities.

Noise, dust and vibration monitoring equipment would be installed and impacts of noise and dust pollution would be recorded and mitigated in accordance with British Standard Guidance (for example BS 5228:2009: Noise and Vibration Control on Construction and Open Site, the Noise Abatement Act (1960) and CIRIA Guidance Note C692: Environmental Good Practice on Site (2010), and National Grids guidance relating to the Specification for the Demolition of Redundant Structures) to ensure that the operation of equipment within manufacturers stated maximum noise levels. It is therefore considered the impact of demolition would be within anticipated limits of tolerance, of limited duration and localised in nature.

It is considered that, through the implementation of best practice and measures set out within the Outline Demolition Methodology, including dust suppression and noise mitigation impacts would be minimal, temporary and limited in duration. As such, the effects not considered to be significant in this context particularly due to urban and suburban character of areas around the site. Such impacts are therefore not considered to be of a scale which is more than local significance and therefore do not warrant consideration as part of an EIA.

### Risk of accidents

As with any development project there is a risk of accidents. It is considered that if appropriate site management and health and safety protocols are adhered to, any risk to health and safety could be satisfactorily managed.

The application site will be secured throughout the duration of the works. The site is already secured by boundary treatment, but it is understood that additional security and fencing would be installed within the site boundary, as detailed in the Outline Demolition Methodology, to prevent unauthorised access. The existing boundary fence around the proposed site will be retained during the demolition works. Some infilling works may be required to facilitate the proposed dismantling works i.e. importing material to the site in order to create a ramp to allow machinery to access the void. Furthermore, the infill material used on site would be subject to National Grid's chemical screening process to ensure it is appropriate to use. The proposed site would be cleared and secured upon completion of the proposed works.

The main risks in terms of a development of this nature are the contamination of land and/or water from spillages and leakage. However, it is not considered that the proposed demolition works pose a significant risk in this regard given the existing conditions at the site.

It is considered that given the scale and nature of the development, such impacts are not likely to be of more than local significance, short in duration and predictable.

The area is not considered to be environmentally sensitive and whilst there is potential to impact on the Ashton Canal, this can be managed to avoid any hazardous effects through management of demolition activities and surface water run-off.

Given the scope of works and the above measures, it is considered that potential risks have been appropriately considered and an EIA would not be required.

### **Characteristics of the potential impact**

The potential significant effects of the demolition must be considered in relation to criteria set out within Schedule 3 of EIA Regulations 2017 and discussed below:

- i. Magnitude and spatial extent of the impact - In this instance, the extent of the impact is considered to be localised only and not of significance. Construction impacts including noise, dust, vibration and vehicular activity would be limited to the site and surrounding area.
- ii. The nature of the impact - The impacts of the proposed development are outlined below:

The development site is considered to be previously developed land. The development site is formed of the gas holder and associated buildings , areas of hardstanding and self seeded trees and grass.

The former gas holder and associated buildings are not listed or located within a conservation area. The site is not the subject of any tree preservation orders.

The existing ancillary buildings within the site have very limited or negligible architectural merit, and whilst the gas holder frame could be considered to be a non designated heritage asset, due to the location and the regulatory requirement from Ofgem to dismantle the gasholders by the end of the RIIO T2 period (2026), on balance it is not considered that any visual impact would be significantly harmful to visual amenity to require consideration through an EIA.

With respect to impacts on ecology, the site has limited ecological value. This has been accompanied by a bat survey which indicates that no bats have been found and that the three buildings to be demolished within the site have a low potential to support a bat roost, and that the onsite habitats also have low suitability for foraging/commuting bats. The risk of harm or disturbance to bats and bird is therefore limited, but the submission documentation suggests a further a single emergence (dusk) survey for bats should be undertaken on buildings B1, B2 and B3 to confirm if they support a bat roost, prior to demolition. Other precautionary mitigation measures are recommended within the Appraisal to mitigate any potential impacts on ecology during the works.

The impact on site from general construction noise and traffic may result in short term, but predictable, disruption to habitats for birds and foraging bats, but it is considered such impacts can be managed as part of the process and will therefore not require consideration by an EIA. It is considered that any impacts to ecology would be of a localised nature and not give rise to any significant effects on the environment requiring consideration through an EIA.

Whilst the proposed development works would have the potential to result in increased construction traffic, dust pollution, noise and vibration, all impacts would be medium-term, limited and appropriately managed and mitigated through working hours and practices. The production of waste will not be significant and will be mitigated through the proposed recycling and re-use of materials; i.e 'waste' arising from the works would be negligible.

On balance, taking account of all of the above considerations, it is considered that any impacts would be of a localised nature and not give rise to any significant effects on the environment requiring consideration through an EIA.

The proposed demolition would have some impact on air quality in respect of demolition work and related vehicle movement that may affect residential properties in relatively close proximity to the site. However, it is considered that the proposal would have a manageable impact on local air quality through the provision of dust suppression measures during the implementation of works with a limited scope and duration.

The site has no apparent archaeological value.

The site is located in Flood Zone 1 and is therefore not within an area with a significant risk of flooding. There should be no excessive surface water run-off from the demolition process and any created can be accommodated by existing drains around the site. It is confirmed that noise, dust, vibrations are to be kept to a minimum. The nature of the site means that it is likely to have historical land contamination, i.e. gas and ground conditions.

The supporting documentation, however, confirms that the works comprise the removal of the holder and associated infrastructure to ground level, with the concrete base remaining in-situ and therefore no ground works are proposed. As the ground will not be broken by the dismantling works it is not anticipated that there would be ground contamination risks arising from the proposal which would be significant in nature and would not preclude demolition taking place.

On this basis, the development site is not considered to be environmentally sensitive site. The site is not known to contain any natural resources that would be affected by the development. As has been detailed above the site does not lie within any site that has been allocated for its ecological or biodiversity value.

On this basis, the impact on the local environment would be limited and on this basis, an EIA is not considered necessary.

iii. Transboundary nature of the impact - Transboundary impacts will be limited to the transportation of material from the site. These movements will not result in significant impacts on the local highway network and would be temporary in nature.

Given the scale and nature of the development, transboundary impacts would be localised and predictable, and an EIA on this basis is not required.

iv. Intensity and complexity of the impact - As detailed within the application submission, the impacts associated with demolition have been thoroughly assessed and understood. Through appropriate best practice measures and successful mitigation, an EIA will not be required.

v. Probability of Impact - Through assessment of the submitted information, any impact is understood and considered to be of a localised nature and of a short duration only. Through appropriate best practice measures and mitigation, the impacts are considered acceptable and therefore do not require assessment through an EIA.

vi. Expected onset, duration, frequency and reversibility of impact - Any impact as a consequence of the above is likely to be medium term or temporary. On this basis, it is not considered that an EIA will not be required.

vii. Cumulation of the impact with the impact of other existing and/or approved development - As stated in addition to small scale development in the locality, with more substantive development being fully implemented. An EIA is not therefore required on this basis.

viii. Possibility of effectively reducing the impact - Reducing the impact is possible through the implementation of best practice measures, effective protocols and mitigation as outlined within the application documentation. An EIA will not therefore be required.

ix. Expected onset, duration, frequency and reversibility of impact – As stated the works would take approximately 7 months and undertaken with specified working hours. The loss of the gas holder and associated buildings would be permanent and non-reversible in that it would change the visual character of site and how it is viewed in the urban landscape. However, the site is not considered to be environmentally sensitive and the gas holder and associated buildings are not considered to have such significant merit, that an EIA is required to assess these issues.

Paragraph 58 of Appendix 2 of the PPG (Screening Checklist)

Provides a screening checklist as to which types of cases in which an EIA is more likely to be required for particular types of developments. It states that an EIA is unlikely to be required for the redevelopment of land unless the new development is on a significant greater scale than the previous use, or the types of impact are of a markedly different nature or there is a high level of contamination.

For sites which have not previously been intensively developed the following criteria is relevant:

- i. Area of the scheme is more than 5 hectares; or
- ii. it would provide a total of more than 10,000 sq. metres of new commercial floorspace; or
- iii. the development would have significant urbanising effects in a previously non-urbanised area (e.g. a new development of more than 1,000 dwellings).

The demolition of this structure and associated buildings would create some degree of additional traffic movements along the surrounding roads. However, this would not be too significant for the demolition period. Noise would be limited to the demolition of the building and structures and limited to specific working hours.

### **Mitigation if development is not EIA development 'General Provisions relating to Screenings' Under Part 2 Regulation 5**

Regulation 5 (5) (b) and paragraph 18 of the NPPG states "if it is determined that proposed development is not EIA development, state any features of the proposed development and measures envisaged to avoid, or prevent what might otherwise have been, significant adverse effects on the environment".

As detailed above it is considered that the potential impacts from a development of this nature are as follows:

- Visual/landscape character;
- Heritage and archaeology;
- Ecology and biodiversity;
- Traffic and access;
- Air quality and pollution;
- Use of resources including water;
- Creation of waste;
- Land contamination;
- Noise/dust/emissions from construction and operations of the development; and
- Cumulative impacts.

It is considered that whilst some there will be environmental impacts associated with this development, these can be suitably mitigated against. This is detailed below:

- Visual amenity/landscape character – The proposed development contains areas of green infrastructure in the form of self-seeded trees and grass. The removal of the gas holder and associated buildings has the potential to affect the existing vegetation due to the siting of contractors accommodation, rather than the proposed demolition works. It is not envisaged that mitigation works warranting consideration by EIA would be required;
- Heritage and archaeology – The development is located in an area where there are no conservation areas, listed buildings and other non-designated heritage assets, other than the gas holder. It is therefore not envisaged that mitigation works warranting consideration by EIA would be required .
- Ecology and biodiversity – Given the nature of the proposed works, whilst it is considered that there may be some potential to impact on the ecology on the site, that this would be limited and localised impact.
- Traffic and access – The access to the site would be as existing. Anticipated vehicular movements are set out in the supporting Outline Demolition Methodology. To minimise impact of traffic on surrounding roads, vehicle movements would be staggered to avoid queuing along Bradford Road. It is understood that there would be fluctuations in the number of movements through the programme meaning some weeks would experience greater levels of activity and others far less. If the programme were to be reduced, this may result in a modest increase in HGV movements, but the extent (timescales) of disturbance would be reduced accordingly. HGV movements will be managed to avoid peak periods of congestion and anti-social hours.
- Air quality and pollution – There are likely to be impacts on air quality during the demolition works. There are likely to be short term impacts during the demolition programme, which can be suitably mitigated against during the through the Outline Demolition Methodology. When the demolition is complete, there will be a neutral impact on air quality .
- Use of resources including water – The proposal will not utilise any resources which are in short supply. Measures can be adopted during the demolition process to minimise the impact on resources being used in a sustainable manner such as water.
- Creation of waste – The proposal will create a degree of waste. Through careful waste management arrangements during the course of the proposal, the impacts of waste generation can be minimised which should also include efforts to recycle waste.
- Land contamination – The land is not complex in this regard. The nature of the site means that it is likely to have historical land contamination, i.e. gas and ground conditions. As the ground will not be broken by the dismantling works it

is not anticipated that there would be ground contamination risks arising from the proposal, which should minimise any effects in this regard.

- Noise – During the construction phase the development is likely to generate a degree of disturbance from comings and goings in the local area. These effects can be minimised and through the measures in the Outline Demolition Methodology
- Cumulative impacts – The development site is located in an area of significant change where there are likely to be other developments taking place in close proximity to each other. The effects of this are not considered to be of more than local significance .

## **CONCLUSION**

Based on the above, it is concluded that the proposed demolition would have some local impacts on the surrounding area. However, these impacts have been assessed and it has been concluded that there would not be significant enough to be of more than local importance and therefore does not warrant a formal Environmental Impact Assessment. The relevant matters can be assessed in detail as part of a prior notification application. Therefore, the opinion of the City Council, as Local Planning Authority, is that an Environmental Impact Assessment is not required.

This screening opinion relates to the requirements of an Environmental Impact Assessment only and does not inform in any way that the demolition is acceptable and that prior notification would be granted.

The City Council as Local Planning Authority reserves the right to seek an Environmental Impact Assessment of any future planning submission on this site.

Yours sincerely,

Derek Jones  
Section Planning Manager