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4 September 2017

Angela Leckie
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Manchester City Council
Town Hall Extension
Albert Square
Manchester
M60 2LA

Dear Angela,

Town and Country Planning (Environmental Impact Assessment) England Regulations 2017 – Request for an EIA Screening Opinion - Prior Notification of Proposed Demolition of Armstrong House and Associated Structures, Oxford Road, Manchester

This letter has been prepared to assist Manchester City Council (MCC) in adopting a Screening Opinion as to whether the proposed demolition of Armstrong House and associated structures (as described below in this letter) comprises 'Environmental Impact Assessment (EIA) development' as defined by the Town and Country Planning (Environmental Impact Assessment (England) Regulations 2017.

In accordance with Regulation 6 of the EIA Regulations, this report contains:

- A plan sufficient to identify the land; and,
- A brief description of the nature and purpose of the development and of its possible effects on the environment.

EIA Regulations

In order to determine whether the proposals require formal EIA, regard must be had to the EIA Regulations.

Where a proposed development falls within one of the descriptions contained in Schedule 2 of the EIA Regulations, it is prudent to obtain a 'screening opinion' from the Local Planning Authority to determine whether the proposed development is EIA development. This is defined as a development likely to have significant effects on the environment by virtue of factors such as its nature, size or location.

In deciding whether a Schedule 2 development is an EIA development, i.e. it is likely to have significant effects on the environment by virtue of factors such as its nature, size, or location, Regulation 5(4) provides as follows:

> *"Where a relevant planning authority ... has to decide under these Regulations whether Schedule 2 development is EIA development the relevant planning authority ... must take into account in making that decision… such of the selection criteria set out in Schedule 3 as are relevant to the development."*

The selection criteria specified in paragraphs 1 to 3 of Schedule 3 of the EIA Regulations refer respectively to the characteristics of the development, the location of the development, and the type and characteristics of

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the potential impact. Paragraph 1 provides that the characteristics of the development must be considered having regarded a number of matters. Paragraph 2, dealing with the location of the development, specifies a number of matters which have to be considered in relation to the environmental sensitivity of geographical areas likely to be affected by the development. Paragraph 3, dealing with the characteristics of the potential impact, provides that the potential significant effects of the development must be considered having regard to a number of matters.

National Planning Practice Guidance

Government guidance on the implementation of the EIA Regulations is contained in National Planning Practice Guidance. In dealing with general considerations relating to the need for an EIA for Schedule 2 development, paragraph 18 of the guidance refers to the selection criteria in Schedule 3 of the Regulations which identifies three broad criteria, namely:

- the characteristics of the development (such as its size, use of natural resources and quantities of pollution and waste generated);
- the environmental sensitivity of the site; and
- the characteristics of the potential impact (such as its magnitude and duration).

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

- for major developments of more than local importance;
- for developments proposed for particularly sensitive or vulnerable locations; and
- for developments with unusually complex and potentially hazardous environmental effects.

Site Context and Overview

Site Description and Site Context

The demolition site is located within the Circle Square Masterplan, within Manchester City Centre. The demolition site comprises land in the south eastern part of the masterplan, with a site area of approximately 0.53 hectares. It is bound by Cloak Street to the north, Princess Street to the east, the Mancunian Way to the south and Oxford House to the west.

The demolition site currently accommodates Armstrong House and a small allocation of surface car parking.

Immediately to the east of the site lies the Manchester Technology Centre (Oxford House), a commercial building which also forms part of the wider Masterplan Site. This building currently remains in active office use and commercial units are located at the ground floor fronting Oxford Road.

To the north of the demolition site is the construction site of Phase 1 A of the Masterplan located on the western bank of the River Medlock. On the eastern bank of the River Medlock are residential apartments within Princess House and Montana House. Together these blocks accommodate circa 130 apartments.

The Mancunian Way fly-over is situated along the demolition site's southern boundary and creates a barrier between with the main University campuses further south. There are a number of car parks and sports pitches located under the Mancunian Way.

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Wider Planning Context

The demolition site forms part of a wider regeneration priority area, being located within the Circle Square Masterplan. Manchester City Council's Executive Committee endorsed a Strategic Regeneration Framework (SRF) for development of the masterplan site in July 2013. The SRF encompasses the Former BBC Site plus office accommodation to the south of Brancaster Road and Cloak Street at Armstrong House and the Manchester Technology Centre.

Bruntwood and their development partner Select Property Group acquired the masterplan site in March 2015 and developed a concept masterplan that was endorsed by the Council's Executive in April 2015. This proposed a comprehensive, employment led mixed use redevelopment of the site including commercial office space; other business / research space; a new residential neighbourhood; ground floor retail and leisure space; and a series of public realm interventions that would see the site becoming a vibrant new district, legibly connecting into the wider city centre fabric.

Since then a number of planning consents have been granted for the first phases of development, including three serviced apartment buildings, two commercial office buildings, two residential apartment buildings and a multi-storey car park and hotel. Construction has begun on two of the serviced apartment buildings, with construction due to commence on all the other buildings granted consent in late 2017 / early 2018.

Planning History

Full Planning Permission (ref: 113832/FO/2016) was granted on 18 November 2016 for the development of a multi-storey car park and hotel (referred to as 'Plot 14'). Due to the location of the red-line boundary this consent included the demolition of the Mancunian Way spur on the site, but did not include the demolition of all of Armstrong House.

The Proposed Development

The proposed demolition comprises the demolition of Armstrong House and associated structures.

Details of the extent of demolition is shown on drawing reference: 1829-FCBS-14-ZZ-DR-A-0130.

A Demolition Method Statement prepared by Thompsons who will undertake the demolition, is enclosed with this application to provide details of how the potential impacts of demolition will be managed, including noise and dust, waste management for materials, traffic movement and other impacts on adjacent business and residents.

Screening Assessment

Introduction

In determining whether the Proposed Development constitutes EIA development, the following questions must be answered in accordance with the EIA Regulations 2017 and National Planning Practice Guidance:

- Is the proposed development of a type listed in Schedule 1?
- If not, is it listed in Schedule 2?
- If so, is it of more than local significance, located in an environmentally sensitive area or likely to give rise to unusually complex and potentially hazardous effects?
- And/or does it meet any of the relevant thresholds and criteria set out in Schedule 2?

Schedule 1 Projects

EIA is mandatory for projects listed in Schedule 1 of the EIA Regulations. The Proposed Development is not of a type listed in Schedule 1.

Schedule 2 Projects

The EIA Regulations state that the Proposed Development may be considered to be Schedule 2 development under Category 10 'Infrastructure Projects,' of the EIA Regulations:

- Sub-section 10 (b) relates to 'urban development projects', and states that development should be screened for the need for EIA if: (i) the development includes more than 1 hectare of urban development which is not dwellinghouse development; (ii) the development includes more than 150 dwellinghouses; or, (iii) the overall area of development exceeds 5 hectares.
- The proposals do not include any new urban development or dwellinghouses therefore does not exceed the threshold set out in Part (ii) of the above.
- The Proposed Development covers an area of approximately 0.53 hectares and therefore does not exceed the 5.0 hectare threshold set out in Part (iii) Schedule 2 10 (b) of the EIA Regulations.

Schedule 3

Schedule 3 of the EIA Regulations sets out selection criteria which relate to specific matters including the characteristics of development, the location of development and characteristics of potential impact. These are assessed in detail within the enclosed Screening Checklist.

National Planning Practice Guidance

National Planning Practice Guidance provides further guidance on determining whether an application would require a formal EIA. For Urban Development Projects, Paragraph 58 of the guidance states that particular consideration should be given to:

- scale of development compared to the previous/existing use;
- whether the types of impact are of a markedly different nature; or
- whether there is the potential for a high level of contamination to exist.

Proximity to Sensitive Sites

The relationship between a Proposed Development and its location must be considered. For any given development proposal, the more environmentally sensitive the location, the more likely it is that the effects will be significant and will require EIA. Certain designated sites are identified in Regulation 2(1) as 'sensitive areas' and the criteria in the second column of Schedule 2 do not apply there. Environmentally sensitive sites are:

- Sites of Special Scientific Interest (SSSI) and European Sites;
- National Parks, the Broads, and Areas of Outstanding Natural Beauty (AONB); and
- World Heritage Sites and scheduled monuments.

The site is not located within or in close proximity to a 'sensitive area' as defined by the EIA Regulations.

Screening Assessment

Table 2 summarises a screening assessment for this type of development, taking account of the EIA Regulations and National Planning Practice Guidance.

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Table 2: Screening Assessment Summary

	Criteria	Discussion	EIA likely to be required?
EIA Regulations	Schedule 2 of the EIA Regulations	The proposed demolition covers an area of approximately 0.53 hectares and therefore does not exceed the 5.0 hectare threshold set out in Part (iii) Schedule 2 10 (b) of the EIA Regulations. The proposals do not include any new urban development or dwellinghouses and therefore does not exceed the threshold	×
	Does the site lie within or adjacent to a "sensitive area"	It does not.	×
National Practice Guidance	Scale of development compared to the previous/existing use	The proposed development comprises the demolition of the existing buildings on site, resulting in a reduction in the scale of development assessed under this application.	×
	Whether the types of impact are of a markedly different nature	The demolition of the existing buildings will not cause impacts of a markedly different nature.	×
	Potential for a high level of contamination to exist	A Phase 1 Detailed Desk Study and Phase 2 Intrusive Investigation was undertaken by Curtins in 2015 for the masterplan site which does not identify any ground contamination issues for demolition.	×
	Development of sites not previously intensively developed if site area is more than 5 hectares	The demolition site is previously developed and has an area of 0.53 hectares.	×
	Whether there would be significant urbanising effects in a previously non-urbanised area	The site is located within a city centre location, a substantially urbanised area that is previously developed. The proposed development will not create a significant urbanising effect.	×

In summary, it is considered unlikely that there will be significant effects as a result of the proposed development.

The main points identified above to substantiate this view are:

- The proposed demolition is required as enabling works to facilitate the delivery of Plot 14 (Ref: 113832/FO/2016). The relationship of the proposed demolition with surrounding land uses will be compatible given that the demolition site is located within a mixed-use area of Manchester City Centre and an area identified within the draft SRF as a key transformational area. In addition, the demolition site forms part of a wider site which benefits from an extant planning permission for redevelopment.
- The proposals will help deliver high quality development, helping to deliver objectives within the National Planning Policy Framework and adopted local planning policy, including the Manchester Core Strategy and the draft SRF.
- The proposal will not create any significant effects and it is not expected that the proposed development would lead to cumulative significant effects when considered alongside surrounding live and potential future development phases.

- The extent of any impacts will be local, and the overall impact of the scheme would not be unusually complex, great, raise any sensitive land use issues, or extend beyond the immediate area within which the site lies.

Application Submission

Although no significant potential impacts have been identified, technical assessments are submitted with the Application for Prior Notice of Proposed Demolition to identify and assess any non-significant impacts that may occur and to ensure that the effects of these can be avoided or mitigated. The Prior Notification of Proposed Demolition will be supported by the following documents:

- Application Form;
- Drawing references:
  - Site Location Plan
  - 1829-2-FCBS-14-ZZ-A-0120 – Existing Site Plan
  - 1829-2-FCBS-14-ZZ-A-0130 – Demolition Extent Plan
- 12600-701-P4 – Scope of Works Plan
- EIA Screening Letter
- Demolition Site Notice
- Phase 1B Extended Phase 1 Habitat Survey and Bat Inspection Survey prepared by Penny Anderson Associates
- Demolition Method Statement prepared by Thompsons

We would be grateful for your Screening Opinion based upon the information contained within this report and its enclosures. If you have any queries please do not hesitate to contact my colleagues Niall Alcock (0161 455 6787) or Ellen Sanderson-Clark (0113 292 1119).

Yours sincerely



John Cooper
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