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Planning Department
Manchester City Council
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30 April 2010
Our Ref: 072379

Dear Sir / Madam

Proposed Student Accommodation
482 - 506 Moss Lane East, Manchester
Request for Environmental Impact Assessment (EIA) Screening Opinion: Regulation 5 Town and Country Planning EIA Regulations 1999

Introduction

We are writing on behalf of Marcus Worthington Properties Ltd, in accordance with Regulation 5 of the Town & Country Planning (Environmental Impact Assessment) (England & Wales) Regulations 1999 (as amended) ('the Regulations'), to seek clarification from the Local Planning Authority as to whether an Environmental Impact Assessment will be required in respect of proposals to redevelop 482 – 506 Moss Lane East, Manchester, for student residential accommodation.

Under Part II, Clause 5 of the Regulations, please treat this letter as a formal request for a "Screening Opinion". We believe that it would be useful to establish at this stage that none of the elements either individually or cumulatively, qualify under Schedule 1 or Schedule 2 as development requiring an Environmental Impact Assessment (EIA).

To aid your assessment of the proposal, we enclose a site location plan which identifies the land in question. Within this letter, we set out what is being proposed and our consideration of the potential environmental effects associated with this.

Description of the Site

The application site covers an area of 0.51 ha and is located on a previously developed site. It fronts Moss Lane East to the north and Heald Grove to the west.

The site comprises two commercial buildings (one of which has been partially demolished), formerly in use as a factory for manufacturing handkerchiefs, but more recently for storage and distribution purposes. The site is currently being used as a temporary hard standing car park which provides in the region of 95 – 100 car parking spaces.

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In terms of the site's immediate surroundings, the area is mixed use in nature. The site is bounded by Whitworth Park to the north, the listed Whitworth public house, a restaurant and supermarket with associated car park to the east, a vacant job centre and 5 storey student apartment blocks to the south and south east, a three to four storey block of student flats to the west and two storey terraced properties along Heald Grove.

Description of the Proposal

The Proposal

The formal description of development is as follows:

> *"Demolition of existing structures and erection of 416 bedroom student accommodation with associated ancillary uses, access and servicing."*

The ancillary accommodation includes a reception, office, games room, laundry, plant and central bin store, provided at ground floor level.

The overall development totals for the proposed development are broken down below:

Gross Internal Area	11,822 sqm
Net Internal Area	10,237 sqm
Gross / Net	86.6%
Number of Student Accomodation Clusters	80
DDA Rooms	7
Standard Rooms	259
Premium Rooms	146
Apartment Rooms	4

The proposal has been developed within the parameters of an existing 'minded to approve' scheme for residential development (Application Ref: 085605/FO/2008/S1). Indeed, the composition of the proposed development scarcely deviates from the minded approved scheme as distinct blocks of different sizes evolve from the consideration of the surrounding urban form. The development has been continually informed and is sympathetic to adjacent or potentially adjacent structures - where there are more

sensitive properties (such as the terraced properties on Heald Grove and the adjacent listed Whitworth Public House) the proposed building responds with set backs and a lower number of storeys.

The main vehicular, pedestrian and cyclist access will be available from Moss Lane East to the north of the site. This will enable access for car and cycle parking, as well as servicing. Two further pedestrian access points to the site are proposed at Heald Grove, which will bring pedestrians directly into the site.

Servicing will occur internally within the site, via the entrance from Moss Lane East. It is anticipated that all necessary forms of servicing will take place from this entrance, including refuse collection, deliveries and any removals.

The proposed development will be accompanied by a maximum of 10 car parking spaces plus 5 disabled spaces, for use by staff and essential users only.

Assessment of Whether an EIA is Required

The proposals may be considered to be captured by Schedule 2 (10) of the Regulations, in the specific category of '(b) urban development projects over 0.5 hectares':

"…Urban development projects, including the construction of shopping centres and car parks, sports stadiums, leisure centres and multiplex cinemas…."

Circular 02/99 *Environmental Impact Assessment* states that development listed in Schedule 2 requires an EIA if it is likely to have *significant effects on the environment* by virtue of factors such as its size, nature or location. It also identifies that as a starting point, authorities should study Schedule 3 of the Regulations which sets out the 'selection criteria' which must be taken into account in determining whether a development is likely to have significant effects on the environment. Three broad criteria which should be considered are identified:

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

In addition, the EIA Regulations and associated guidance require that development be considered in conjunction with other developments coming forward in the vicinity in terms of potential cumulative effects.

Matters Material to the Determination of the Screening Opinion

It is our view that the proposal does not require an EIA for the following reasons:

- the development does not give rise to environmental issues of more than very local significance, as set out within the remainder of this letter;
- the site is previously developed and, at present, does not make a positive contribution to the visual amenity of the area - the proposed scheme will introduce a new building of high quality design, which is contextually responsive;
- the proposal is not located within an environmentally sensitive area such as a SSSI or SBI and will have no significant effect upon ecology on or near the site;
- the broad principle of redeveloping the site for high density student accommodation is wholly compatible with existing uses in the surrounding area (which comprises a broad mix of uses including a public house, restaurant and supermarket with associated car park to the east, a vacant job centre and 5 storey student apartment blocks to the south and south east, a three to four storey block of student flats to the west and two storey terraced properties along Heald Grove);
- the highway effects of the development are acceptable;
- there will be no significant detrimental impacts relating to the risk of flooding; and
- the proposed use is not a significant noise generator and will not lead to an unacceptable increase in noise in the area.

Taking into the account the selection criteria for screening, our view is that the proposal does not require an EIA taking into account the following observations.

Characteristics of the Proposed Development

The site is 0.51 hectares and is situated only a short distance from the Oxford Road / Wilmslow Road corridor, the main university area and the Central Manchester University Hospitals NHS Foundation Trust.

There are currently two buildings on this site, which were historically used to manufacture handkerchiefs, but which are both now vacant. One building has been demolished in part, but the perimeter walls and ground floor slab remain, which detract from the appearance and character of the area, particularly to Heald Grove, where residential accommodation fronts onto the partially demolished disused building. The site is currently used for surface level parking. Both disused buildings would be fully demolished to allow construction of the proposed development.

In view of the mass and height of neighbouring uses, the proposed building is consistent and entirely satisfactory for this location. The building has been well informed by and is sympathetic to adjacent structures. It is located immediately to the north and north east of large, five storey student flats, a four-storey block of student apartments to the west and eight-storey apartment blocks just to the north east of the site. Where there are more sensitive properties such as the terraced houses on Heald Grove, the proposed building responds with set backs and a lower number of storeys.

Cumulative Impact

Our research has indicated that there are no significant committed development projects in the immediate vicinity of the site.

Use of Natural Resources

It is envisaged that the proposed development will not result in the use of any natural resources that are considered to be in short supply. This is not therefore a significant environmental effect.

Further detail is provided in the supporting planning application documentation including the Environmental Standards Statement, accompanying BREEAM pre-assessment and Energy Strategy.

Production of Waste

It is acknowledged that the proposed development will generate waste during the demolition and construction phases. However, the levels of waste likely to be produced, and the method of disposal of such, will not produce significant environmental effects. A Waste / Refuse Management Strategy has been developed detailing how construction and waste are to be handled, and this forms part of the application documentation.

Pollution and Nuisances

Once remediation of the proposal site is complete, it is not considered there will be any significant issues with regard to ground conditions and contamination.

It is not expected that the proposal will produce unacceptable levels of noise pollution. Any particular plant or other items which generate noise will be designed to be acoustically treated to prevent unacceptable noise break out, in line with the recommendations of the Environmental Noise Report.

Risk of Accidents

The development will not abnormally increase the risk of accidents having regard, in particular, to substances or technologies used. Whilst inevitably there are risks during the construction phase of any project, we do not consider that these risks will be at an unacceptable level, given that appropriate health and safety protocols will be adhered to. Similarly, the risk of accident to the general public or the environment during construction and upon occupation is of an acceptable level.

In addition, the development will not involve the use, storage, transport, handling or production of substances or materials which could be harmful to people or the environment.

Flood Risk

The Environmental Agency website confirms that the site is Flood Risk Zone 1 (i.e. the flood risk level is less than 1 in 1000 years for fluvial or tidal flood risks). As the proposal relates to a site comprising 0.51 ha, a Flood Risk Assessment is not required to accompany the planning application submission.

Secure By Design

The design process has taken into account the need to embrace Secured by Design principles and pre-application consultation with the Greater Manchester Police Architectural Liaison Unit has taken place. A Crime Impact Statement has been submitted in support of the application for planning permission which concludes that the proposed development has been assessed against, and is consistent with, the principles of crime prevention through environmental design (CPTED), thus it will reduce the opportunities for crime and reducing the fear of crime within the vicinity.

Traffic and Transport

The Transport Statement submitted alongside the application confirms that the overall impact of the development on the local transport network is likely to be minimal as the accommodation is to be occupied by students, who are expected to have limited access to cars.

The site currently benefits from access to a range of excellent bus services being close to a number of key bus routes located between Manchester City Centre and south Manchester. It is also within close walking distance of a small but well equipped local centre comprising a full range of shops, services and amenities.

Socio-economic

The proposals will create beneficial impacts in terms of job creation during both the construction and operational phases of development. It will also help to support the ongoing vitality of the local economy through increased student spending. In the context of the wider economy these are positive effects, although they are not 'significant' in the context of the meaning of the Regulations.

Landscape / Visual Impact

The site is previously developed and at present does not make a positive contribution to the visual amenity of the area. The proposed scheme introduces carefully designed buildings to the site which reflect the character and nature of the area and responds to the scale of the surrounding streets.

Appropriate landscaping is to be introduced across the site, including a landscaped strip between the proposed fence and the front of the building.

Architectural Heritage

It is considered that the site does not contain any buildings of significant heritage.

Ecology

An Ecological Assessment has been submitted alongside the planning application submission. This concludes that site does not currently include any land that is of significant ecological value and the impact of the proposal will therefore be very limited, and certainly not significant.

Location of Development

The proposals for student residential accommodation will not adversely affect surrounding land uses and are compatible.

The proposal involves the re-use of previously developed land.

The site is not located within an environmentally sensitive location, as defined by Annex B of Circular 02/99, or Schedule 3, Section 2, part (c) of the 1999 EIA Regulations.

There are no areas on or around the proposal site which contain important, high quality or scarce resources which could be affected by the development.

Characteristics of the Potential Impact

The extent of the impact is local. 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.

The economic impact of the proposal for Rusholme and Manchester as a whole will be beneficial, in terms of the temporary employment generated by the proposals during the construction and management phases of the development as well as increased student spending in the local economy and spin off business.

The proposal would be consistent with the character and density of development already established within this area.

The scheme involves the use of existing infrastructure in the locality which will be improved and reused.

There would be no transfrontier effects as a result of the development.

It can be concluded that there will be no cumulative impacts as a result of the proposed development.

Conclusion

Taking into account the above, we would be grateful for the Council's formal consideration as to whether an EIA is required in respect of this development proposal. Please note that this letter should set out the reasons for the screening opinion adopted and be placed on the public register

I look forward to hearing from you. In the meantime, if you have any queries please do not hesitate to contact me or my colleague Heather Gallagher (0161 247 7348).

Yours sincerely



pp **Michele Steel**
for Deloitte LLP (trading as Drivers Jonas Deloitte)