

Planning and Regeneration
Manchester City Council
Town Hall Extension
Mount Street
Manchester

Our Ref: EKPS/231110/KD

By Email Only

16 January 2025

Dear Sir / Madam

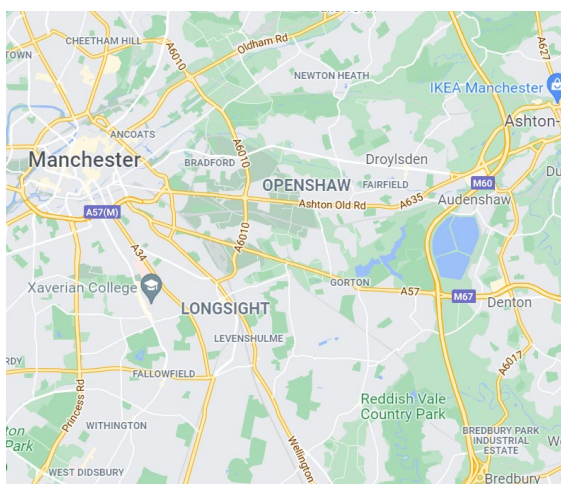
Request for Environmental Impact Assessment (EIA) Screening Opinion: Proposed Residential Development, Land off Crabtree Lane, Openshaw.

On behalf of our client, Keepmoat, we write to request a formal Environmental Impact Assessment (“EIA”) Screening Opinion in respect of proposed development at Crabtree Lane, Openshaw.

This request is submitted under Regulation 5 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (referred to hereafter as the “EIA Regulations”). Guidance on EIA as set out within the Planning Practice Guidance (“PPG”), which provides guidance on the application of EIA in England, has also been consulted.

The Application Site

The Site is approximately 2.8 hectares in size and falls within the administrative boundary of Manchester City Council (“MCC”). The Site is located within Openshaw in East Manchester, approximately 5 km to the east of Manchester City Centre. **Figure 1** shows the Site location (Site identified with a red dot) whilst **Figure 2** shows the Site in its immediate context (both images taken from Google Maps).



^ Figure 1



^ Figure 2

The Site is bound by the Ashton Canal to the north, scrubland to the east, Openshaw Community School to the southeast, residential properties to the south, and Crabtree Lane to the east, beyond which is an industrial estate. It is noted that Ashton Canal is a site of special biological importance (SBI) for its canal habitat.

The Site currently partially accommodates overgrown vegetation and vacant industrial buildings, which were previously occupied by a traditional forge works specialising in stainless steel and nickel forging. The remainder of the Site currently comprises land previously in use as part of the Connell Brothers operations.

The demolition of the existing buildings on-site is due to take place imminently, following the positive determination of the prior approval for demolition application reference: 141725/DEM/2024.

Development Proposals

The application proposals present an opportunity to deliver c. 200 new homes, including those suitable for family housing and affordable housing, in a sustainable location within Openshaw, East Manchester.

The application proposes the following:

“Full Planning Application for the development of 194 dwellings (Class C3) with new vehicular accesses from an upgraded Crabtree Lane and associated works” (“the Proposed Development”).

The Proposed Site Plan is shown in **Figure 3** below.



^ Figure 3 Proposed Site Plan

Need for a Screening Opinion

The need for a Screening Opinion has been considered in the context of the following Regulations and Guidance:

- European legislation under Directive 2011/EU.
- The Town and Country Planning (England) (Environmental Impact Assessment) Regulations 2017 (the “EIA Regulations”).
- Planning Practice Guidance (“PPG”).

The EIA Regulations outline thresholds for what are described as Schedule 1 and Schedule 2 Projects. EIA is mandatory for Schedule 1 projects. An EIA is required for Schedule 2 projects if, in the opinion of the Local Planning Authority, they are likely to give rise to significant effects on the environment.

In determining whether the Proposed Development constitutes EIA development, the following are to be taken into consideration:

- Whether the Proposed Development is of a type listed in Schedule 1;
- If not, whether it is listed in Schedule 2; and
- If so, whether the Proposed Development is:
 - 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
 - It meets any of the relevant thresholds and criteria set out in Schedule 2.

Schedule 1 Projects

An EIA is mandatory for projects listed in Schedule 1 of the EIA Regulations, however 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 EIA Regulations. Sub-section (b) relates to ‘Urban Development Projects’.

The relevant legislation provides thresholds and criteria for the identification of Schedule 2 development requiring EIA and indicative values for determining significant effects.

In respect of ‘Urban Development Projects’ the Schedule 2 criteria and threshold includes:

“(i) The development includes more than 1 hectare of urban development which is not dwellinghouse development; or (ii) the development includes more than 150 dwellings; or (iii) the overall area of the development exceeds 5 hectares”.

The Proposed Development exceeds the thresholds set out in Schedule 2, Development Type 10(b) of the EIA Regulations as whilst the development is dwellinghouse development on a site less than 5 hectares, it comprises 194 dwellings.

Local Significance / Sensitivities

Turning to the significance of the project; it's location (in terms of environmental sensitivities); and if the development is likely to give rise to unusually complex and potentially hazardous effects; it is noted that the development is not of more than local significance; the site is located within an existing urban area and on a brownfield site which is not particularly environmentally sensitive; and the development is for a residential use (and therefore unlikely to give rise to unusually complex and potentially hazardous effects).

Indicative Screening Thresholds

The PPG centred on EIAs advises (at Paragraph 018 Reference ID: 4-018-20170728) that:

‘Only a very small proportion of Schedule 2 development will require an Environmental Impact Assessment’.

In order to provide a broad indication of the type or scale of development which fall under the Schedule 2 criteria and which are likely to require an assessment the guidance includes an annex document (at Paragraph 058 Reference ID: 4-058-20150326) regarding indicative screening thresholds.

With regards to Development Type 10, ‘Infrastructure Projects’, Part (b), ‘Urban development projects’ – the indicative criteria and threshold column states the following:

“Environmental Impact Assessment is unlikely to be required for the redevelopment of land unless the new development is on a significantly 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.

Sites which have not previously been intensively developed:

- (i) area of the scheme is more than 5 hectares; or*
- (ii) it would provide a total of more than 10,000 m² 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 ‘Key Issues to Consider’ column advises that when considering urban development projects, the main issues relate to:

- The physical scale of such developments; and
- Potential increase in traffic, emissions and noise.

The key considerations identified above, are reviewed in the context of the Proposed Development below and overleaf.

Appraisal

Indicative Criteria and Threshold

With regards to the indicative criteria and threshold set out in the PPG, it is noted that the area of the Site is not more than 5 hectares. However the Proposed Development exceeds the threshold as it comprise more than 150 dwellings. The development does not include any commercial floorspace.

The Proposed Development comprises the redevelopment of a previously developed site in sustainable location. The Site is within an established urban area, where redevelopment is expected to take place. With this in mind, it is considered that the types of impact associated with the Proposed Development are not anticipated to be markedly different in scale or nature. Critically the development would not '*have significant urbanising effects in a previously non-urbanised area*', and the Proposed Development comprises 194 dwellings only (well below the listed example of 1,000 dwellings).

The Physical Scale of the Development

The proposals involve the redevelopment of a previously developed site in a sustainable urban location. The Proposed Development includes approximately 194 dwelling comprising a mix of both apartments (70 no.) and dwellinghouses (124 no.). This includes 1 bed and 2 bed apartments across 4 no. apartment blocks comprising 4 storeys; and 2 bed, 3 bed and 4 bed dwellinghouses of two and three storeys. The proposals also include car parking, landscaping and public open space.

Design

The Proposed Development has been sensitively designed to respond to the urban context of the Site, and the aspirations of the area, informed by pre-application discussions with Local Planning Officers and key stakeholders, including the Canals and Rivers Trust.

The development seeks to activate the canal and associated tow path, with development orientated to provide passive overlooking and improved perception of safety along the tow path, whilst providing visual links to the canal through the development achieved through the proposed layout and creation of key routes and streets through the site. The proposed material palette is also informed by the context with the tonal use of red brick allowing for subtle variations and assisting with way finding and a sense of place.

Proposed elevations are included within **Figure 4**, and **Figure 5** below and overleaf.



^ Figure 4



^ Figure 5

Heritage

Turning to heritage matters, the Proposed Development does not lie within a Conservation Area, and there are not any listed buildings or structures located on the Site. However, the Site is located adjacent to Ashton Canal Lock Number 13 at Crabtree Lane Swing Bridge which is Grade II Listed and extends east to Ashton Canal Lock Number 14 between Crabtree Lane and Edge Lane which is also Grade II Listed. Accordingly, Kathryn Sather & Associates (“KSA”) has been appointed to prepare a Heritage Statement to set out the significance of the heritage assets and assess whether the Proposed Development is likely to have any impact on this significance.

The Heritage Statement concludes the following:

- As a Grade II listed structures, restored and in working order, Lock 13 and Lock 14 are of national significance. They are of historic significance, illustrating the successful engineering of man-made waterways to connect industrial sites and transport raw and finished materials through an environment which changed from rural to industrial. With reference to heritage impact guidance (IEMA, IHBC & ClfA. Principles of Cultural Heritage Impact Assessment in the UK. Lincoln: July 2021), these listed structures would be afforded a significance level of medium.
- The Proposed Development has the potential to impact on the setting of the listed structures. The setting today of Ashton Canal Lock Number 13 at Crabtree Lane Swing Bridge and Ashton Canal Lock Number 14 between Crabtree Lane and Edge Lane is characterised by their recreational use and experienced by walkers on the tow path, boaters and those at the historic public house. The wider setting has altered significantly from the post-war period and is largely surrounded by modern structures which have replaced former industrial structures.

- The significance of the heritage assets will not be harmed by the development of the apartment blocks and houses on the derelict site of the former foundry. This assessment finds that the proposed works south of Ashton Canal Lock Number 13 at Crabtree Lane Swing Bridge and Ashton Canal Lock Number 14 between Crabtree Lane and Edge Lane constitutes a slight positive or neutral impact. Therefore, there is no harm to the heritage assets.

The application is also supported by an Archaeology Desk Based Assessment prepared Archaeological Research Services. This recommends that a Level 2 historic building recording is undertaken on any existing structures on site relating to Crabtree Forge prior to any demolition works, and that archaeological and structural monitoring in the form of a watching brief should be carried out during further site investigation works. The building recording has taken place ahead of the proposed demolition works included within the prior approval for demolition application at the site (141725/DEM/2024) which has now been approved.

The specific terminology of EIA, which identifies significant effects and non-significant effects, is not generally reflected in national planning policies and cultural heritage guidance although the difference in terminology is noted in the IEMA, IHBC & ClfA. Principles of Cultural Heritage Impact Assessment in the UK. Note 1 of the Design Manual for Roads and Bridges LA 106 Cultural Heritage Assessment Revision 1 (“DMRB”) provides a definition of a significant impact. It states that:

‘NOTE 1 The effect on the cultural heritage resource is not significant when the impact does not substantially diminish the heritage interest of the cultural heritage resource.’

Taking into consideration the heritage significance of the identified assets, the contribution made by their setting, including the Site, it is concluded that there would be no significant environmental effects arising from the proposed development, and therefore any heritage effects do not contribute to the need for an EIA.

Notwithstanding, the Heritage Assessment will be submitted with a full planning application for the Proposed Scheme. The assessment will identify all assets with potential to be affected by the Proposed Scheme, describe their significance and setting, and assess the impact of the Proposed Scheme upon that heritage significance.

Ecology

A Preliminary Ecological Appraisal (“PEA”) of the Site and Proposed Development has been undertaken by Collington Winter. As part of this, the Site was subject to an Extended Phase One Habitat Survey and a Preliminary Bat Roost Assessment of all buildings.

In addition to the PEA, a nocturnal survey for bats has been carried out for by Collington Winter on 21 August 2024. A peak count of two common pipistrelles were observed foraging between Buildings 1 and 3 however no bats were identified emerging and/or re-entering the buildings at any of the vantage points. As a result it is considered that the full demolition of the buildings and construction of new buildings on the site carries a very low risk of injuring and/or killing bats or disturbing/destroying bat roosts.

The PEA and the Bat Survey includes a number of recommendations to avoid impact on birds, bats, badger and hedgehog, including (inter alia):

- Production and implementation of a Construction Environment Management Plan (CEMP);
- Production and implementation of RAMS for hedgehog, badger, reptiles and amphibians to avoid any harm to these species during the proposed works;
- Invasive species survey for the extent of the cotoneaster, himalayan balsam and japanese knotweed identified with the site;

- Production of an invasive species method statement to avoid the spread of invasive species into the wider landscape during the proposed works; and
- Noting the buildings are to be demolished under approval 141725/DEM/2024, it is recommended that precautionary working methods to be employed in relation to Bats with a licenced ecologist to undertake a daylight inspection to assess the status of the site for bats prior to works commencing on site; having all remaining potential roosting features identified inspected with a torch and /or endoscope, and if no evidence of bats is found, works may proceed unsupervised at the discretion of the appointed ecologist.

Provided the recommendations detailed above are followed, there would be very limited impacts on the local ecology as a result of the Proposed Development. These mitigation measures can be secured via an appropriately worded condition during the planning process.

Summary

With the above technical matters in mind, it is considered that the physical scale of the Proposed Development is not likely to give rise to any significant environmental effects and therefore does not contribute to the need for an EIA.

Increase in Traffic, Emissions and Noise

A Transport Statement ("TS") and Interim Travel Plan has been prepared by Curtins to support the planning application.

A review of baseline conditions and highway safety in the vicinity of the site has been undertaken. It is not considered that there is an existing highway safety issue that is likely to be exacerbated by the Proposed Development.

The TS identifies that the Site is accessible by sustainable modes of transport. The surrounding area exhibits good levels of pedestrian and cycling infrastructure, and there are several public transport opportunities within acceptable walking distance of the site.

The TS concludes that the impact of traffic from the Proposed Development on the wider highway network will be minor with regard to additional trip generation and it is reasonable to conclude that the impact is not significant or severe in the context of the NPPF.

As such, it is considered that the development will not result in environmental effects when considered in the context of the IEMA significance/scoping thresholds.

Notwithstanding, these conclusions, it is also noted that the Transport Statement will still be submitted with an Interim Travel Plan as part of the application submission in line with best practice guidance.

Emissions

Redmore Environmental Ltd have been appointed to undertake an Air Quality Assessment in support of a residential development on land off Crabtree Lane, Manchester.

An Air Quality Assessment was undertaken to assess potential impacts associated with fugitive dust emissions during the construction phase of the proposed development; assess potential impacts associated with road transport emissions during the operational phase of the proposed development; and, identify any requirement for relevant mitigation measures.

Potential construction phase air quality impacts from fugitive dust emissions were assessed as a result of demolition, earthworks, construction and trackout activities. It is considered that the use of the identified site-specific control measures would provide suitable mitigation for a development of this size and nature and reduce potential impacts to an acceptable level.

Potential impacts during the operational phase of the proposals may occur due to road traffic exhaust emissions associated with vehicles travelling to and from the development. Dispersion modelling was therefore undertaken in order to predict pollutant concentrations at sensitive locations as a result of emissions from the local highway network both with and without the development in place. Results were subsequently verified using local monitoring data.

Review of the dispersion modelling results indicated that air quality impacts as a result of traffic generated by the development were not predicted to be significant at any sensitive location in the vicinity of the site.

A number of mitigation measures were identified in line with the requirements of Manchester City Council's 'Air Quality and Planning Technical Guidance' in order to reduce vehicle exhaust emissions associated with the proposals. It is considered these are appropriate for a development of this scale and nature and will further control impacts during the operational phase.

Based on the assessment results, air quality factors are not considered a constraint to the development and it is therefore concluded that the Proposed Development is not likely to give rise to any significant environmental effects in respect of emissions that would contribute to the need for an EIA.

Notwithstanding, the Air Quality Assessment will be submitted as part of the application submission in line with the Councils validation checklist and best practice guidance.

Noise

A noise assessment has been undertaken in relation to existing noise sources impacting upon the proposed noise sensitive development by E3P. This assessment is informed by the results of an acoustic survey carried out along the boundaries of and within the site area.

The main potential noise impacts are associated with the commercial areas to the north and west with the potential for school yard noise from the south. During the surveys, no commercial sound was noted from the north during any period but sound from the west from the scaffold premises was noted and school playground noise was also noted. However, neither source were considered significant to cause undue noise impacts onto the Proposed Development.

The submitted assessment concludes that adverse environmental noise impacts can be completely removed within proposed dwellings with the inclusion of appropriately specified double glazed windows and suitable ventilation systems in the context of the area.

With regards to construction, it is considered that noise and vibration can be managed and mitigated effectively via a suitably worded Construction Environmental Management Plan (CEMP), using relative standard prescriptive methods of noise/vibration control, in the context of the site location. This can be secured via planning condition.

As a result, it is considered unlikely that potential significant adverse effects would occur, and any potential noise impacts can be fully considered through the planning process through the submission of the Noise Assessment.

Accordingly, it is considered that the Proposed Development is not anticipated to have any significant environmental effects in respect of noise that would contribute to the need for an EIA.

Contamination

Phase 1 Geo-Environmental reports have been completed by Betts Hydro and E3P, with a Phase 2 report also being prepared by E3P for the former brick works site. These reports, alongside a Phase 2 report for the remainder of the site following demolition work, will also be submitted with the application.

The reports conclude that based on historical and current land uses, it is likely that some contamination may be present on-site comprising sources of heavy metals, polycyclic aromatic hydrocarbon (PAH), total petroleum hydrocarbon (TPH), asbestos and ground gas may be present. However it is not anticipated that this would pose a significant risk, or be beyond levels expected for a brownfield site of this nature.

Notwithstanding, the contamination and associated risks can be mitigated through suitable remediation measures which will include ground gas monitoring and the installation of a suitable cover system in all proposed private gardens, landscaping and public open space to remove any potential for direct exposure to impacted soils. The specific design and installation process for the appropriate cover systems will be clearly defined within the site remediation and enabling works strategy which will be prepared and submitted as part of the planning process.

As a result, it is considered unlikely that potential significant adverse effects would occur, and any contamination can be fully considered through the planning process through the submission of the aforementioned reports, Phase 2 investigations and a subsequent Remediation Strategy. With this in mind, the Proposed Development is not anticipated to have any significant environmental effects, with regards to contamination and other similar forms of pollutant that would contribute to the need for an EIA.

Conclusions

Whilst the Proposed Development is considered to be a 'Schedule 2' project, as outlined in this letter it does not meet any of the indicative criteria and thresholds identified in respect of Development Type 10, 'Infrastructure Projects', Part (b), 'Urban development projects' within the PPG.

Critically, the new development is not of a significantly greater scale than the previous use or the surrounding built form, and the types of impact expected with the Proposed Development are not markedly different nature.

Summary

The Proposed Development involves the redevelopment of a previously developed site in an urban location for a residential development comprising houses and apartments providing c. 200no. new homes.

The Proposed Development is not of a type listed in Schedule 1. The Proposed Development does fall within Schedule 2 development under Section 10 'Infrastructure Projects', specifically within sub-category (b) 'Urban Development Projects', by way of more than 150 dwellings being proposed.

Notwithstanding, the development is not of more than local significance; the site is located within an existing urban area which is not particularly environmentally sensitive; and the development is unlikely to give rise to unusually complex and potentially hazardous effects.

Furthermore, with regards to the key considerations as set out within this letter (comprising the scale of development; traffic; emissions; noise and contamination), it is concluded that there are no technical matters which suggest the development would give rise to any significant environmental effects.

As such, it is concluded in this instance, that an EIA is unlikely to be required, and we would be grateful if you could provide a formal EIA Screening Opinion for the Proposed Development.

Please do not hesitate to contact me by 'phone (0161 513 4284) or by email (katie@euankellie.co.uk) should any matters arising from the application require clarification.

Yours faithfully,

Katie Daniels

Director

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