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Robert Griffin
Planning Control
Manchester City Council
PO Box 532
Town Hall
Manchester

Ref: KD/LF/JK/5051MA/L002

5th May 2023

Dear Robert,

Town and Country Planning Act (Environmental Impact Assessment) Regulations (2017) – Request for Screening Opinion in respect of a full planning application for the partial demolition of existing buildings to the north of the main school building and refurbishment and extensions to the main school building, with associated hardstanding and landscape works at the former Newall Green High School site, to the west of Greenbrow Road, Wythenshawe, Manchester, M23 2SX.

Introduction

On behalf of our client, Morgan Sindall Construction (on behalf of the Department for Education), we write to request a screening opinion pursuant to Regulations 6 (1) and 6 (3) of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 ('the EIA Regulations') as to whether the Local Planning Authority considers that an Environmental Impact Assessment is required to accompany a full planning application for the partial demolition of existing buildings to the north of the main school building and refurbishment and extensions to the main school building, with associated hardstanding and landscape works ('the Proposed Development') at the former Newall Green High School, Greenbrow Road, Wythenshawe, Manchester, M23 2SX ('the site').

Applications for planning permission require a Local Planning Authority to issue a screening opinion as to whether an EIA is necessary where the proposed development is listed under Schedule 1 or 2 where it satisfies the criteria or thresholds set in the EIA Regulations.

From a review of the Schedule 2 'exclusion' criteria and thresholds for 'urban development projects', it is evident that the Proposed Development falls within Schedule 2 10(b), as the Site extends to more than 1 hectares and it is not dwellinghouse development. In accordance with the thresholds in column two of Schedule 2, the Proposed Development has been examined against the criteria contained in Schedule 3 to assess whether it will have significant environmental effects.

This letter therefore sets out the site details, the nature and purpose of the development, and the main environmental issues that are likely to be associated with the Proposed Development.

Please find enclosed the following documents to support this EIA screening letter:

- Location Plan (ref: FS0998-IBI-XX-XX-D-A-3001)
- External Works General Arrangement Plan (ref: FS0998-IBI-A-14-XX-D-L-7001)
- External Works Site Sections (ref: FS0998-IBI-A-14-XX-D-L-7013)

The Site

The site comprises the former Newall Green High School premises, located off Greenbrow Road. It extends to approximately 2.86 hectares and consists of several buildings, as well as hardstanding and green space including a 3G synthetic playing field to the north of the buildings. The main school building is an inverted L-shape and sits relatively central in the campus. This building is situated to the south of numerous extensions and buildings also associated with the former school.

To the south of the central block is the main entrance to the school for those arriving on foot or by vehicle. There is a designated drop off zone provided just off Greenbrow Road with an area of parking adjacent to this.

In terms of the surrounding area, the Site is bound by Greenbrow Road to the east and Clay Lane to the west. A public house (Newall Green) and a SEND sixth form are situated to the east of the Site. The larger, linear sixth-form building and associated parking is accessed via the access road in the east of the Site. It is understood that this access road would still be shared between the two education facilities. Residential properties surround the Site to the north, north-east, south and west. Further north of the Site, where Clay Lane meets Floats Road, Roundthorn Industrial Estate and Roundthorn Business Park are located, which stretch northwards until they meet the A560. Wythenshawe Hospital also lies within this industrial site.

Currently, vehicular and pedestrian access to the school is provided off Greenbrow Road with three separate points of access for pedestrians.

Bus stops are situated to the north and south of the Site on Greenbrow Road, which provide frequent services throughout Wythenshawe, Stockport, Manchester city centre and Altrincham. It is therefore considered that the Site is situated within a sustainable location.

The Site is not within a Conservation Area but there are three Grade II Listed farm buildings (Listing ID refs: 1220351, 1197897 and 1291017) to the south-west of the Site, approximately 135m from the Site.

The Environment Agency's mapping indicates that the Site is entirely located in Flood Zone 1 and therefore, it is not at risk of fluvial flooding. The Site is also at low risk of surface water flooding from all other sources.

Screening Opinion

Commentary of Environmental Issues

The Proposed Development falls within Schedule 2, 10(b) as an 'urban development project' which exceeds 1 hectare of development and is not dwellinghouse development (criteria i). It is considered that the Proposed Development will raise a number of important planning-related issues but that these issues will not result in significant environmental effects which would warrant classification of the proposal as EIA development.

The EIA Regulations indicate that requests for Screening Opinions should be accompanied by an appropriate level of information to assist the LPA in reaching its decision. The following matters will each be dealt with in turn:

- The nature of the proposed development; and
- The consideration of the screening criteria.

Nature of the Proposed Development

The Proposed Development seeks full planning permission for the partial demolition of the existing school buildings to the north of the main school building and refurbishment and extensions to the main school building, with associated hardstanding and landscape works at the Site.

The Trust's estate vision and ambition for Dixons (Manchester) over the next 5 years is to consolidate the school and grow it, through the Proposed Development, to fill the maximum secondary school places of 750 pupils. It should be noted that this is still a decrease from the previous capacity of the existing school on the site, which was 900 pupils.

The Proposed Development will see the retention of the central 'L' shaped building in the centre of the site, demolition of the buildings to the north of this, and three extensions to the retained building to provide a two-storey classroom block, a new stair tower and a sports hall. Development of the site into a single block provides a layout more suited for educational establishments; staff will have views and good site lines to large open spaces, allowing for continuous supervision of pupils. The proposed demolition and replacement extensions allow for simple segregation of the building for out of hours community use and will increase the amount of hard and soft open space within the site, where the buildings to be demolished is currently situated.

Internally, the proposed extensions will provide replacement classrooms mainly, as well as a new sports hall. Externally, the extensions have been designed to match the existing building with shot-blasted exposed blockwork and white render proposed for the classroom extension, and shot-blasted exposed blockwork and new built-up steel standing seam cladding proposed for the stair tower and sports hall.

The extensions will have green roofs and PVs on the roofs, whilst PVs will also be added to the roof of the southern block which is to be retained.

The demolition will result in the creation of new hard standing for informal play in the centre of the Site, whilst informal soft and biodiversity areas with tree planting are proposed to the north of this. The 3G synthetic pitch in the north-western corner of the Site will also be enhanced as part of the proposals.

The intention is to retain the access points and reinstate the access from Clay Lane to the west for servicing purposes. The proposals will result in the provision of 6 new parking spaces (including 3 accessible spaces and 1 minibus space) to the south of the sports hall, as well as 3 new cycle stands providing 6 cycle parking spaces. In the existing main car park, the existing drop off zone will be replaced by more standard parking spaces, whilst 5 drop off bays will be provided in the western portion of the car park. Overall, the main car park will comprise 69 parking spaces, including 4 accessible spaces, the 5 drop off bays and 14 EV charging points. The car park will operate an 'in and out' system with cars entering in the south and exiting in the north.

A 2.4m perimeter is proposed around the entirety of the Site, whilst the existing fences within the Site will be retained.

The new sports hall and enhanced 3G synthetic pitch will be available for community use, promoting the protection and enhancement of sports facilities, to facilitate greater levels of activity for all ages.

Consideration of Screening Criteria

The requirement to provide an EIA should be determined having regard to the EIA Regulations and government advice set out in the National Planning Practice Guidance (PPG) on Environmental Impact Assessments. In determining whether a proposal constitutes EIA development, the determining body must consider whether a development falls within the relevant thresholds for either Schedule 1 or Schedule 2 development. Secondly, if development falls within Schedule 2 but not Schedule 1, it must be determined whether the development would be 'likely to have significant effects on the environment' by reference to Schedule 3.

Schedule 1 of the EIA Regulations establishes the development categories for which an EIA must be submitted. These are proposals which have a clear potential for significant environmental effects such as crude oil refineries, thermal and nuclear power stations and installations for the processing of irradiated nuclear fuels. There are 23 types of development in this schedule, but none include any of the elements proposed as part of this development.

Schedule 2 of the EIA Regulations outlines the development categories for which an EIA may be required (our emphasis). Paragraph 10(b) includes 'urban development projects' where the development extends to more than 1 hectare and is not a dwellinghouse development. Although the proposed extensions will not extend to more than 1 hectare, the overall development including the external play areas such as the upgraded 3G pitch and new hard and soft spaces, and the reconfigured parking area, will extend to more than 1 hectare. Therefore, it is considered necessary to assess whether the Proposed Development is likely to have significant environmental effects or is located within a sensitive area. These matters are discussed below.

Schedule 3 establishes that the requirement to provide an EIA for Schedule 2 development will be subject to the consideration of the characteristics and location of the development proposed and whether the development would be likely to have any 'significant effects on the environment'. The PPG states that 'it should not be presumed that developments above the indicative thresholds should always be subject to assessment, or those falling below these thresholds could never give rise to significant effects, especially where the development is in an environmentally sensitive location. Each development will need to be considered on its merits.' (Para 018, Reference ID: 4-018-20170728).

The key test is whether the proposed development would have a significant effect on the environment, and this relates largely to the location of the site and the existing use of the land. The Annex to the PPG goes on to give consideration to the likely environmental issues which would trigger the requirement for an EIA. The Annex indicates that the key issues to consider in the circumstance of the application proposals would be 'physical scale of such developments, potential increase in traffic, emissions and noise'.

In light of the above, this letter now turns to look at the likely effects of the development, having regard to the selection criteria contained within Schedule 3 of the EIA Regulations and the key considerations set out in the PPG, in relation to the physical location of the proposal.

Physical Location of the Site

The Site is not located in an environmentally sensitive area as defined in Regulation 2 (1) of the EIA Regulations. These are: Sites of Special Scientific Interest and European Sites; National Parks, the Broads and Areas of Outstanding Beauty; and the World Heritage Sites and Scheduled Monuments.

Socio-economic and impacts on human health

The Site is considered highly accessible by car, bicycle, and on foot. As an existing school site, the buildings are well located in respect of nearby residential areas, with local and wider strategic road networks readily accessible, including the M56 which is located an approximate two minute drive from the Site. In terms of public transport, bus stops are situated to the north and south of the site on Greenbrow Road, which provide frequent services throughout Wythenshawe, Stockport, Manchester City Centre and Altrincham. It is therefore considered that the Site lies within a sustainable location with good access to public transport and with links to the wider local and strategic road networks. Accessing the Site is therefore capable in a number of ways, with users not wholly reliant upon private vehicles.

It is envisaged that the proposals will have a positive socio-economic impact through job creation during the construction and operational phases, and by delivering high quality education provision for families, whilst ensuring access to educational facilities and indoor and outside sporting facilities including a sports hall and a 3G synthetic pitch. Overall, the new school facilities will bring the school back into active use and enable it to meet the educational needs of its students, offering better quality teaching and sporting environments. The new sports hall and enhanced 3G pitch will be available for community use, providing positive social benefits for residents nearby who would gain access to high quality sport and recreational facilities.

Given the buildings subject to the proposed demolition have reached the end of their life, their redevelopment would provide for an overall more efficient building, in turn providing more comfortable environment in which students would learn. There are wider sustainability benefits associated with this approach, including a compliance of a 113.4% betterment over the notional building when using the maximum required PV system installation against Building

Regulations Part L2 (2021). Consequently, the proposals are considered to deliver positive socio-economic benefits and as such an EIA is not considered to be required on these grounds.

Other matters which may impact upon human health such as air quality, noise and ground conditions are considered elsewhere in this letter but overall, no significant effects are anticipated.

Traffic and transport

Construction

Vehicle movements generated by the construction process are likely to be associated with the initial demolition phase of existing buildings, with the delivery of plant and demolition machinery coupled with vehicles travelling to and from the site to remove and dispose of waste material. During the construction phase, the delivery of plant and construction materials by HGVs, as well as construction staff travelling to and from the Site by cars, is anticipated. Consequently, construction traffic may unwittingly result in temporary adverse effects on pedestrian and driver delay on the main construction routes to and from the Site, and may also adversely affect pedestrian and residential amenity, severance, fear and intimidation, and accidents and safety.

To mitigate the potential adverse effects of the Proposed Development during the construction phase, a Demolition and Construction Management Plan has been prepared by Morgan Sindall Construction and submitted as part of the planning application. The document identifies tried and tested measures to help mitigate the potential adverse effects of demolition and construction. The submitted Construction Management Plan will be agreed with the relevant bodies, prior to construction commencing.

Following the implementation of the Construction Management Plan, it is considered that the Proposed Development will not result in any significant environmental effects during the construction phase which would warrant an EIA.

Operational Phase

A Transport Statement has been produced by Flinders Chase to support the full application. Overall it finds that the re-opening of the former Newall Green High School will not place additional burden on the local transport network, when compared to the school's closure in August 2021.

All access points into the Site and servicing arrangements will remain as previous. The front car park will be rearranged to accommodate a larger number of vehicles, and a small area of parking has been added within the servicing area in the west of the Site.

Road Traffic Collision data indicates that there are currently no safety issues related to the local highway network that need to be addressed as part of the school-development.

In terms of enhancing pedestrian safety in and around the site, a zebra crossing to the north of the school site and the uncontrolled crossing consisting of a footway build out at the main entrance on Greenbrow Road provide plenty of safe crossing facilities.

Overall, it is considered that the Transport Statement will adequately address any transport related impacts of the Proposed Development during the operational phase and therefore, there is no requirement for an EIA in respect of transport.

Trees

An Arboricultural Implications Assessment and Arboricultural Method Statement have been prepared by Syntegra Consulting in support of the full planning application. The Arboricultural Implications Assessment sets out that Trees No. T6 and G2 are proposed to be felled whilst T7, T8, T10 & G5 will have their crowns lifted to 3m to allow for the installation of the proposed fence. All tree works are proposed to be undertaken outside of the bird nesting period. The remainder of the trees will be retained and protected.

Due to the loss of trees identified, it is proposed that along with the general soft landscaping for the development, supplementary tree planting will support the application with 35 additional trees proposed. This will have a number of benefits for the development, including providing a greater diversity of age class of trees on the Site, increasing the sustainability of the Site, and providing a greater diversity of species and as a result, creating more wildlife habitats.

A precautionary method of working near trees is detailed within the Arboricultural Method Statement.

Overall, whilst the proposals will result in the removal of a limited number of trees these trees are rated to be of U and C quality, which is low. Therefore, it is evident that no significant environmental effects are anticipated and that the impacts of tree removal can be adequately mitigated for through the provision of an appropriate landscaping scheme on the Site. As such, an EIA is not considered to be required in respect of trees.

Ecology

The Site is not located in an ecological priority area or an environmentally sensitive area as set out above. A Preliminary Ecological Appraisal (PEA) of the Site was undertaken by Syntegra to support the planning application.

Habitats on the Site were identified to be relatively common, with the only priority habitats comprising native hedgerows present around the Site. All habitats were identified to have previously been highly managed with no recent management at the time of the survey in June 2022.

The potential for protected species was identified within the Site, with a number of ecological receptors identified. The PEA provides a set of recommendations varying from retaining protected or high value habitats and implementing a sensitive landscaping plan, to carrying out appropriate surveys for great crested newts, trees and bird and bat surveys to establish if any important species are present within the Site, and providing bird and bat boxes and hedgehog houses.

Following a 'Good' Habitat Suitability Indices score for great crested newts at the site pond within school grounds, Syntegra carried out an eDNA survey for the species.

The results of the survey are pertinent to the single pond only. While presence of great crested newt has not been confirmed within the survey pond at this time, the Site was found to provide potential terrestrial habitat for great crested newt and other amphibians, particularly within the areas of grassland, scrub and hedgerows. Considering the significant records in nearby ponds, the potential for the Proposed Development to have an impact on any great crested newts present in and around the site does exist.

The survey underlines that should changes to work plans occur, further impact assessments should be made to identify the likelihood of impact to great crested newts or other amphibians. Where this is deemed likely to impact great crested newts, it is recommended that construction works are carried out under a Natural England Protect Species License. This may require additional surveys to be carried out of any ponds within 500m of the proposed works.

In terms of biodiversity, Syntegra have also produced a Biodiversity Impact Calculation Report. A gain of +215.80 habitat units was identified following the completion of baseline and post-development calculations. This would result in a 1508% net gain in habitat units, which is well above the current requirements of both national and local policy, as well as the Government's proposed intentions of mandating Biodiversity Net Gain at a minimum of 10% through adoption of the Environmental Bill in the near future.

Overall, it is argued that the ecological value of the Site can be retained and enhanced, and biodiversity net gain is clearly capable of being achieved on site. Subject to mitigation measures outlined in PEA and following further survey work in support of the planning application, the status of protected species of wildlife would be maintained. Implementation of all of the above will ensure that no significant environmental effects would arise in respect of ecological matters and as such, an EIA is not required in respect of these issues.

Flood Risk and Hydrology

The Site is located within Flood Zone 1, which is defined as having an annual probability of flooding from rivers of the sea of less than 0.1%. The Site is in an area classified as being at 'Very Low' risk of flooding from surface water.

The drainage strategy has been assessed using the standard hierarchy of drainage solutions, with it being concluded that surface water will be discharged to the public sewer via the Site's existing surface water drainage system, subject to agreement with United Utilities and the LLFA. Also, above ground SuDS, including green/blue/brown roofs have been incorporated as part of the drainage strategy. The inclusion of green roofs, green landscaped areas, attenuation in the form of below ground cellular storage, and flow restrictions will all maximise sustainable drainage on the Site, where possible.

The Proposed development is considered to be appropriate development within Flood Zone 1. A Flood Risk Assessment and Drainage Strategy will be submitted as part of the planning application, with the report concluding that an appropriate drainage system can be provided across the Site without resulting in adverse impacts in terms of surface and foul water drainage, and flooding risk.

It is considered that an EIA is not required in respect of flood risk and hydrology.

Ground Conditions

Phase 1 and Phase 2 Geoenvironmental Desk Studies were undertaken by AGB Environmental Ltd in respect of the full planning application; the Phase 1 recommended undertaking a Phase 2 Ground investigation in order to better ascertain underlying ground conditions. Based on the conceptual site model and risk assessment, the Phase 2 survey considered there to be a low risk to end users, site workers and other environmental receptors.

Notwithstanding this, supplementary ground investigations were undertaken more recently by Clancy Consulting within the footprint of the proposed new buildings and temporary accommodation, in order to inform the foundation design, confirm existing building foundation details and perform infiltration tests as required for the drainage strategy. Overall, no visual or olfactory evidence of contamination was encountered during the course of the investigations. More generally, the findings above show that it is not anticipated any significant issues would arise which would be prejudicial to the development being brought forward at the Site.

Based on the above, it is considered that an EIA is not required in respect of ground conditions or contamination.

Noise

An Acoustic Planning Report has been prepared by SRL in respect of the full planning application and concludes that suitable noise levels can be achieved for the school and for the nearby noise sensitive properties.

Noise limits for any fixed plant and equipment associated with the Proposed Development have been established to reduce the impact of noise associated with these at the nearest noise-sensitive receptors. Operational noise-break out from the school building has also been considered and was calculated to be sufficiently low at the nearest noise-sensitive receptors.

Noise breaking through the windows and doors of the music practice rooms and DT workshop have been calculated at the nearby noise sensitive receptors in the area. With these windows and doors open, predicted noise break-out levels from the workshop are around the same level of noise from other ambient sources including roads at the nearest sensitive receptor, whilst the breakout levels were calculated to be below the typical noise from other amenity sources for the music practice rooms. With these windows and doors closed, the predicted noise break-out levels are significantly lower (around 20dB below background noise levels) at the nearest sensitive receptors. This is a positive indication that noise from school can be suitably controlled to avoid adverse noise impacts at all nearby noise sensitive receptors.

The MUGA is an existing facility at the school. The proposals do not represent a change in noise levels from the area and so noise levels will not significantly increase compared to previous use of the area.

In terms of deliveries, the Proposed Development is situated on the site of the existing school. As such, any traffic movements associated with deliveries to this school are unlikely to be significantly different to those previously experienced at the Site. Deliveries will only occur during the daytime.

The proposed mitigation measures ensure that the impact is below a “Significant Observed Adverse Effect”. Therefore, an EIA is not considered to be necessary in respect of noise.

Air Quality

An Air Quality Assessment has been carried out by Hoare Lea in respect of the full planning application.

The Assessment confirms that the Site is not located within an Air Quality Management Area (AQMA), although it is located roughly 500m west of the Manchester City Council’s AQMA. The site suitability assessment indicates no likely exceedances of the relevant Air Quality Objectives (AQOs) for NO₂, PM₁₀ and PM_{2.5} at the Application Site. The Proposed Development is set back more than 600 m from the M56 and therefore concentrations are likely to be lower with increasing distance from any motorway road. Defra predicted background concentrations are predicted to be in compliance with the relevant AQOs in 2024, the anticipated opening year of the Proposed Development.

The risk of dust soiling effects is classed as high and there was a low risk of increases in PM₁₀ concentrations due to construction activities. The risk of dust causing a loss of local amenity and increased exposure to fine particulate matter concentrations has been used to identify appropriate mitigation measures. Provided these are implemented in a dust management plan, for example through a planning condition, the Air Quality Assessment confirms that the residual impacts are not considered to be significant.

It has been noted that there will be no additional traffic generated by the Proposed Development when compared to the former Newall Green High School which closed in 2021. Since traffic from the former school is included within the baseline data, which considers 2019 as the most recent representative baseline year, there is not expected to be any significant changes from baseline air quality. Any additional road traffic is below the screening criteria and as such, in line with the Environmental Protection UK and the Institute of Air Quality Management (IAQM) guidance, the impact of any additional traffic on local air quality is considered insignificant and a detailed assessment of the trip generation is not required.

Overall, it is considered that the Proposed Development is unlikely to have a significant environmental effect on air quality. Therefore, an EIA is not considered necessary in respect of air quality.

Lighting

The Proposed Development will include new lighting, the potential impacts of which will be considered as part of the full planning application. Any floodlights around the 3G pitch which are no longer working will be re-lamped and as such, the Proposed development is not expected to have any negative impacts in terms of lighting, when compared to the existing lighting arrangement on the Site.

It is not thought that the proposed lighting scheme will result in any significant environmental impacts as a result of new lighting technological advancements; lighting can be controlled at different parts and times of the day, reducing light spill if required and appropriate. As such, there is no requirement for an EIA in respect of lighting.

It is not considered that any significant environmental effects will occur as a result of new lighting at the Site. As such, an EIA is not considered necessary in respect of lighting.

Conclusions

It is concluded that the Proposed Development will constitute development under Schedule 2 10 (b) of the EIA Regulations. Whilst the Proposed Development will exceed the indicative scale thresholds identified within the EIA Regulations and PPG for urban development projects, this does not mean that an EIA is automatically required for the proposals. There remains a need to assess whether the Proposed Development, by virtue of its location, will have significant environmental effects. We have shown, by reference to the nature of the proposed use and the characteristics of the Site, that there will be no significant environmental effects.

Whilst the Proposed Development will inevitably raise important planning considerations, these are not considered so significant to warrant an EIA.

Relevant planning issues, including socio-economic and human health impacts, traffic and transport, trees, ecology, flood risk and hydrology, ground conditions, noise, air quality and lighting issues will be properly addressed as part of the suite of documents which will accompany the application, and these documents will provide a thorough assessment to enable the Council to reach an informed conclusion on the merits of the development proposed.

For the reasons set out above, it is our view that the EIA Regulations do not require an EIA in this instance.

We trust the above information is of assistance and look forward to receipt of your formal Screening Direction within the timescales prescribed by Regulations 5(5). In the meantime, please do not hesitate to contact me should you require any further information.

Yours sincerely,

A handwritten signature in black ink that reads 'K. Dixon'.

Kayleigh Dixon
Associate Director
DPP