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PO Box 532 Town Hall
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Mrs Carol Clarke
Bramhall Town Planning Ltd
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Our reference: 136837/DEM/2023

Date 2 June 2023

Dear Carol Clarke,

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

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

Openshaw A E U Club 14 Club Street Manchester M11 1NF

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:

Letter from Bramhall Town Planning Ref: 267/CC dated 28 April 2023

Site Location Plan Ref: BG-EWA-ZZ-ZZ-DR-A-70401 Rev P0

Site Location Plan Ref: BG-EWA-ZZ-ZZ-DR-A-70401 Rev P0 (with demolition site layout details)

Demolition plan Ref: BG-EWA-ZZ-ZZ-DR-A-70403 Rev P0

Swept path analysis Ref: J32 5863 - PS-002

Demolition Method Statement MA001 (07.04.2022) by KMM Civil Engineering Ltd

Preliminary Ecological Appraisal and Nocturnal Surveys for Bats - The Fairfield, Backwell Street, Manchester Ref: P.1503.21 Rev F April 2023 by Ascerta

Demolition works fall within the scope of the EIA Directive and therefore it is now necessary to consider whether the demolition project is likely to have significant environmental effects.

The proposal type is listed in category 10 (b) Urban Development Projects of Schedule 2 of the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 2017, however this proposal falls under the threshold under 1 hectare.

Within the Planning Practice 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 application site relates to the demolition of a building comprising the former AEU Bowling Club. The buildings are situated around the perimeter of the bowling green and include a part two, part single storey club house with integral covered spectator stand, bungalow and toilet blocks. The proposal also involves the removal of external hardstanding areas. It is understood that declining membership followed by pandemic restriction (COVID-19) led to the closure of the club in March 2020. No alternative uses for the existing buildings within the site has been found. The demolition would be related to later redevelopment.

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 buildings and hard surfaced areas redevelopment within a potential development site comprising 0.635 Ha. The applicant has confirmed that the bungalow was previously used on an infrequent basis by the club steward. However, its condition has deteriorated and is considered to be unsuitable for habitation. The site is the subject of the following application for outline planning permission, which was validated on 4 April 2022 and remains under consideration:

133036/OO/2022 - Outline application for proposed redevelopment of the former A.E.U Club, incorporating demolition of existing buildings and structures and construction of up to 26 new residential dwellings (houses or flats) (Use Class C3), with parking, associated landscaping and infrastructure, with approval of siting and access sought

The demolition of the former social club building, spectator stands, toilets, bungalow with associated removal of hard surfaced areas is considered under prior notification of demolition application referenced: 136837/DEM/2023. The detail of the above application replicates a previous and non-implemented prior approval of demolition relating to application referenced: 132995/DEM/2022 determined on: 8 April 2022.

The demolition method statement, risk assessment and other specifications 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, including strip out and removal of roof coverings, together with confirmation that adequate precautions would be undertaken as required. An initial assessment of the building has not identified asbestos but measures would be put in place secure its appropriate removal if suspected or found. 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 given to the possible cumulative effects with any existing or approved development.

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.

All existing electricity, gas and water supplies at the site would be terminated prior to demolition. 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. All waste materials from the demolition shall be separated in skips and taken off site for disposal and / or recycling. Arrangements for the managed removal of asbestos, if required, by a specialist contractor have been specified in accordance with the demolition management plan.

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 and is likely to be of no more than local significance.

Pollution and nuisances

The demolition process is likely to create some pollution and nuisance i.e. traffic, servicing, dust, vibrations and noise.

Some noise impacts will inevitably occur through the implementation of demolition works. However, demolition work would be undertaken over an approximate 15 day period and contained within normal working hours, i.e., Monday-Friday: 08:00 – 17:00, Saturday: 8.30 – 14.00 with no working on Sunday. Noise monitoring measures would be put in place to ensure that the operation of equipment within manufacturers stated maximum noise levels. Particularly noisy operations would be programmed to minimise disturbance. Noisy operation 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 demolition construction method statement, including dust suppression and noise mitigation impacts would be minimal, temporary and limited in duration. The environmental impact would thereby not exceed local significance.

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 site would be enclosed with Heras fencing as required to supplement retained fencing, which would also incorporate mandatory warning signage. Given the scope of works and the above measures, potential risk has been appropriately considered and an EIA would not be required.

Location of development

Existing land use

The building is not listed or located within a conservation area. The site is not the subject of any tree preservation orders. It has some ecological and biodiversity value as a green space and trees within it and along the site boundary. The site has no apparent

archaeological value. Buildings within the site have sustained fire damage as a result of a series of incidents that occurred in early 2023.

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 site has not been identified as having historical land contamination, i.e. gas and ground conditions, that would 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.

Absorption capacity of the natural environment

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.

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:

Whilst the proposed development works would have the potential to result in increased construction traffic, dust pollution, noise and vibration, all impacts would be short-term, limited and appropriately managed and mitigated through working hours and practices. 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.

With respect to impacts on ecology, the site has limited ecological value. The submitted bat report details the findings of emergence surveys undertaken between August and

September 2012, which identified low level bat activity in the north-west of the site. No bats were found to be entering or emerging from the buildings within the site during nocturnal surveys. In the early part of 2023, buildings within the site were extensively damaged following several arson attacks, which have reduced the potential for their use for roosts as a result of damage and debris. In these circumstances the potential for fire damaged buildings to support the site supporting nesting birds is unlikely. It is not apparent that trees within or adjacent to the site would be affected by the development. Measures would be put in place to protect trees within and adjacent to the sites during the demolition phase.

The site does not contain any known designated heritage assets or archaeological impacts that would be affected by the proposed demolition.

In terms of flood risk, site is not shown as being at risk of flooding from rivers. Due to the nature of the use and the site features, surface flooding is also considered to be low risk.

The existing buildings within the site had very limited to negligible architectural merit, prior to the impact of fire damage. It is not considered that demolition would be harmful to visual amenity. Any impact upon the appearance of the streetscene would not be significant as the site is screened by existing boundary walls, a circumstance that may change as part of any subsequent development.

iii. Transboundary nature of the impact - Given the scale and nature of the development, transboundary impacts are not applicable and therefore 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. The implementation of 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. Again, through the implementation of appropriate best practice measures and successful mitigation, an EIA will not be required.

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

ix. Expected onset, duration, frequency and reversibility of impact – As stated the works would be limited to approximately two weeks and undertaken with specified working hours. The loss of the building and associated structures would be permanent and non-reversible

thereby changing 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 building has no significant merit. An EIA is not 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 above criteria would not be exceeded. The demolition of this building and structures would create some degree of additional traffic movements along the surrounding roads. However, this would not be too significant for a relatively short demolition period. Noise would be limited to the demolition of the building and structures and limited to specific working hours.

CONCLUSION

Based on the above, it is considered 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. It is therefore the opinion of the City Council, as local planning authority, 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 W Jones
Section Planning Manager