

ENVIRONMENTAL ASSESSMENT SCREENING

TOWN AND COUNTRY PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2017

FORMAL SCREENING REQUEST FOR ENVIRONMENTAL IMPACT ASSESSMENT 'SCREENING' UNDER REGULATION 6

Proposal: The demolition of certain buildings and the erection of part 4, part 5 storey buildings, together with the refurbishment and restoration of existing buildings to form student accommodation, comprising 318 bed spaces, together with associated landscaping, cycle parking, car parking and associated works

Location: St. Gabriel's, Oxford Place, Manchester

Applicant: McLaren (St. Gabriel's Ltd) and The Sisters of the Cross and Passion

Agent : Avison Young

Is the application subject listed within Schedule 1? **No**

Is the application subject listed within Schedule 2? **Yes**

If **YES** what type of development in Column 1 is the application?

Urban Development Project

Does the application exceed the applicable thresholds and criteria in Column 2?

The area of the development exceeds 0.5 hectares

Is an Environmental Assessment required for the application? **No**

1. Introduction

This screening opinion relates to St. Gabriel's Hall which comprises three main buildings including the lodge (known as the Hall), chapel and extension (Woodthorpe Hall) and St. David's Hall. All buildings are presently vacant, having previously been occupied as a student halls of residence.

In coming to a formal opinion as to 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 the submitted EIA screening report produced by Avison Young.

The proposal type is listed in Class 10 'Infrastructure Projects' subsection 10(b) 'Urban Development Projects' of Schedule 2 of the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 2017.

The regulations indicate that an EIA may be required if:

- The development includes more than 1 hectare of urban development which is not dwellinghouse development; or
- The development includes more than 150 dwellings; or
- The overall area of the development exceeds 5 hectares.

As the relevant threshold is exceeded in term of the number of overall dwellings, a screening opinion is necessary.

An assessment as to whether an EIA is required to support a planning application is therefore provided.

2. Location & Site Description

The site which fronts Oxford Place is bounded by Oxford Place to the south, 5 and 7 Oxford Place to the east, 11 Rusholme Place to the west and the rear of apartments (Melrose Apartments) to the north. To the north-western corner of the site is a development site under construction comprising the erection of a 7 storey building for use as flexible office, research and development and educational Space (with ground floor ancillary retail uses, known as 'City Labs 4.0').

The front of the site comprises areas of hardstanding and soft landscaping, with a tree lined perimeter to the southern boundary. Vehicular and pedestrian access is served from Oxford Place.

The site is situated within the Victoria Park Conservation Area. None of the buildings are statutorily listed and there are no heritage designations which form either part of the site or that would be immediately affected.

In terms of the immediate surroundings, the site is mixed use in nature, comprising residential buildings, including a concentration of student accommodation, retail, office, and educational uses. A short distance to the west is Rusholme district centre – a busy neighbourhood centre which runs north to south along Oxford Road/Wilmslow Road, with a primary focus on food and drink uses.

3. Proposal

The proposed development relates to the demolition of certain buildings and the erection of part 4, part 5 storey buildings, together with the refurbishment and restoration of existing buildings to form student accommodation, comprising 318 bed spaces, together with associated landscaping, cycle parking, car parking and associated works.

The proposed development is expected to contain 318 student bedrooms, comprising a mixture of studio and cluster units, split between existing buildings proposed to be retained and two new-build blocks.

4. Criteria

General considerations relating to the need for an EIA for Schedule 2 developments is identified within national planning practice guidance which references the selection criteria in relation to Schedule 3 of the Regulations. Criteria is listed which 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 particularly environmentally sensitive or vulnerable locations;
- III. For development with unusually complex and hazardous environmental effects.

Below is an assessment as to whether an EIA is required to support a planning application for the above development.

5. Assessment

The following narrative provides a proportionate assessment of the relevant selection criteria.

I. Characteristics of Development

Where development is involved, it must be considered against a number of criteria listed a-f. Namely: the size of development; the cumulation with other

development; use of natural resources; the production of waste; pollution and nuisances and the risk of accidents, having regard in particular to substances or technologies used. A response to this criteria is outlined below.

The size of development

The size of the components comprising the accommodation within the application site are not considered to be of a significant scale. The application site is a brownfield site, home to a former student hall of residence and situated within an urban area with residential and commercial uses nearby. The effects of the development are considered to be of local significance only, with limited potential for significant adverse impact. As such, the proposal is not of scale or type to require an EIA.

Cumulation with other development

The site is located within an urban area subject to frequent small-scale development proposals, as well as larger redevelopment projects associated with Oxford Road corridor.

3 larger developments with recent planning permission have been identified as follows:

125592/FO/2019 - Site South Of Hathersage Road

Erection of a 7 storey building comprising flexible Office (Use Class B1a), Research and Development (Use Class B1b) and Educational Space (Use Class D1), together with ground floor ancillary Retail uses (Use Classes A1 and A3), in addition to associated cycle parking, accessible car parking, landscaping, provision of plant and servicing and related access and highway's works, and other associated works. *Approved 20 March 2020.*

127104/FO/2020 - 323 Oxford Road

Construction of a new 4-storey extension to the rear of 323 Oxford Road for post-graduate research and teaching (Use Class D1); change of use of the existing building at 323 Oxford Road from vacant bank (Use Class A2) to non-residential education (Use Class D1), together with external works relating to the reuse, refurbishment and extension of the building, including works to entrance and front courtyard on Oxford Road, demolition of single storey lean-to structures to rear of existing property to allow for level access; alongside the installation of external plant and screen at roof level and associated works. *Approved 4 November 2022.*

125018/FO/2019 - Base (Hillel House), Greenheys Lane, Manchester Science Park

Erection of a 5 storey building comprising offices (Use Class B1) and ancillary workshop and maker space, together with associated disabled car and cycle parking, landscaping, provision of plant and servicing and related access and highways works, and other associated works. *Approved 23 January 2022.*

In terms of small-scale proposals these are generally limited to modest expansion of existing facilities, household development or changes of use. It is not therefore considered that such works would result in significant cumulative effects.

For the permissions involving the larger scale development identified with closer proximity of the site, it will be necessary for the management of the timescales for implementation of works and site management measures to be adhered to. This will ensure that the proposed development in conjunction other nearby committed development projects, do not cause undue disruption as a consequence of cumulative works.

It is considered through timescale management and best practice, in terms of managing environmental effects of development, the impact would not be so significant to warrant an environmental impact assessment. It should also be noted that the site closest to the proposed site at (City Labs 4.0) is already deep into the construction phase and is unlikely to conflict with development timescale of the current proposal should planning permission be granted.

Use of Natural Resources

The site is not known to contain any significant natural resources and given the size and scale of the proposed development, it is not considered that the development would require any excessive use of natural resources, with only limited levels of resources required in terms of energy and fuel during site clearance, demolition, surfacing, drainage and construction work.

The proposed works are also to be implemented in accordance with the waste hierarchy to minimise natural resource consumption and to maximise the opportunity to re-use and recycle. Accordingly, it is not believed that the use of natural resources will be significant and on this basis, an EIA would not be required.

Production of Waste

Due to the nature of the work proposed, it is not believed that there would be any significant environmental effects of more than a localised nature.

The main implications would arise from site clearance and development, together with the residual effect of vehicle movements during and post development and noise from construction machinery and vehicles.

A Site Management Plan is to be prepared by the contractors to minimise waste and all waste to be produced will be dealt with in accordance with the waste hierarchy to ensure waste is reused and recycled where possible.

Inevitably developments of the scale and nature proposed will create waste both in the construction and operational phases of the development. It is considered however that on balance, the effects would be short in duration, predictable, localised and not significant. All waste will be mitigated through good management best practice and methodology, with works carried out by a approved contractors. As such, it is not considered that an EIA would be necessary on the ground of waste production.

Pollution and Nuisances

Due to the nature of the work proposed, it is not believed that there would be any significant environmental effects of more than a localised nature.

The main implications would arise from demolition, site clearance, construction and drainage works, landscaping, the surfacing of the land and residual effects of vehicle movements during and post development and noise from construction machinery and vehicles.

Survey work undertaken to date have identified potential sources of contamination. A Phase 1 Preliminary Risk Assessment will accompany the planning application, which has identified a moderate to low risk for contaminants to pose a risk to future site users. A further Phase 2 site investigation report consisting of groundwater and surface water sampling will be undertaken on site to confirm ground conditions and any necessary remediation or mitigation.

Noise associated with the construction is evitable both during construction and operational phases of the development.

It is considered that noise associated with the construction will be limited, short term and localised in nature.

The applicant has conducted a Noise Impact Assessment in support of the proposal which considers noise impacts associated with the proposed student accommodation upon existing noise sensitive receptors, including the construction phase, operational traffic flows and fixed plant activities.

It has been identified that external plant has the potential to impact on nearby noise sensitive receptors, but with appropriate design and mitigation, any such equipment is expected to comply with City Council noise criteria.

The site suitability has also been assessed and the external noise levels are considered suitable for residential development. With suitable glazing and ventilation specifications, noise is not expected to be a harmful factor.

It is further considered that through the implementation of best practice measures in accordance with a Construction Environmental Management Plan, any noise impact will be minimal, temporary and limited in duration. Similarly, dust generation as a consequence of construction activities, plant vehicle emissions can be suitably controlled and mitigated. Measures will include damping down and wheel washing. Such measures are considered standard practice.

No significant adverse impacts have been identified in relation to traffic associated with the proposed development. Vehicles movements are anticipated to be limited to drop off/pick-ups, with the development being classed as 'car free' for residents. With the exception of two accessible spaces, the site does not contain any car parking provision. No vehicular access to the site is to be permitted during typical days.

Servicing and access arrangements are to be appropriately managed via a suitable management plan to limit any negative effects.

The site is within walking distance of the universities and close to a high frequency public transport route to the west along Wilmslow Road/Oxford Road. This underlines the highly sustainable and accessible nature of the site which will limit the need to travel by car.

Whilst there will be some limited impact to local residents, it is considered that these would be short in duration, predictable, localised and not significant. On balance through the implementation of best practice measures, it is not anticipated that there will be any harmful effects that would require an EIA.

Risk of Accidents having regard in particular to substances and technologies used

As with any development project there is a risk of accidents.

It is considered that if normal site management, best practice and health and safety protocols are adhered to, there is no reason to believe that there would be any disproportionate increase in risk to health and safety. As such, an EIA would not be required to assess the impact.

II. Location of Development

(i) The existing land use

In terms of the existing land use, the site is situated on brownfield land on the site of a vacant student halls of residence, within an established urban area.

On the basis of the information available, the site is not considered to be within or adjacent an environmentally sensitive location and in this instance does not require consideration by an Environmental Impact Assessment.

(ii) The relevant abundance, quality and regenerative capacity of natural resources (including soil, land and biodiversity) in the area and its underground

The site is not known to contain any natural resources that would be affected by the development.

There are no statutory or non-statutory designated areas on or within close proximity of the site. The site does lie within a Site of Special Scientific Interest (SSSI) Risk Zone, but the development type is not listed as a concern for this proposed location, given the lack of connectivity.

An Ecological Appraisal is to accompany the application which identifies that the habitats on site are generally of limited ecological value, with the garden areas, trees and hedgerows being of most ecological value. It is identified that the site has potential to support protected species, nesting birds and roosting bats.

Through appropriate mitigation and best practice measures, such as the sensitive timing of tree/shrub clearance so to avoid the peak bird nesting season, appropriate lighting, preliminary bat survey works and pre work checks by a qualified ecologist, can satisfactorily minimise any impacts. On this basis, an EIA would not be required to assess such impacts.

(iii) Absorption capacity of the natural environment

The EIA regulations state that attention should be paid to wetlands; coastal zones; mountain and forest areas; nature reserves; parks; areas designated under European Union Directives on the conservation of wild birds; natural habitats, flora and fauna; areas in which environmental standards have been exceeded; densely populated areas; or landscapes of historical, cultural or archaeological significance.

The site does not possess any of the aforementioned characteristics and there is sufficient absorption capacity within the natural environment to accommodate the development. The impact will be of no more than local significance and on this basis, an EIA is not considered necessary.

III. 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. Specifically: the extent of the impact (geographical area and size of the affected population); the transfrontier nature of the impact; the magnitude and complexity of the impact; the probability of the impact; and the duration, frequency and reversibility of the impact.

(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 and vehicular activity will be limited to the site and immediate surrounding area.

(ii) The nature of the impact

Whilst the proposed development works would have the potential to result in increased construction traffic, dust pollution, noise and vibration, all impact will be short-term, limited and appropriately managed and mitigated. This is likely to include controls on working hours and dust suppression.

The impact on ground conditions is to be assessed by the submission of a Phase 1 Preliminary Risk Assessment which reveals that no significant pollutant linkages have been identified and through subsequent site investigation works (Phase 2), the risks associated with the proposed development are considered likely to be low. Through the implementation of standard mitigation measures, the risk to ground conditions is believed to be controllable.

Following completion of site works, the development will give rise to increased traffic movements as part of resident transfer and servicing arrangements.

Vehicles movements to and from the site are however predicted to be relatively low, given the lack of availability of parking and the highly sustainable and accessible location of the site.

The development is also proposed to be car free, with the exception of two accessible spaces. It is not therefore expected that there will be any significant, harmful impacts on the adjoining highway.

During the construction phase, construction vehicles will be short term and managed through standard procedures contained within a Construction Environmental Management Plan and Construction Traffic Management Plan to limit any impacts

In terms of air quality, guidance contained with the suite of National Planning Guidance (NPG) states that air quality is considered relevant to a planning application, when a proposal may:

- Give rise to potentially significant impact (such as dust) during construction for nearby sensitive locations;

- Significantly affect traffic in the immediate vicinity of the proposed development site or further afield; or

- Expose people to existing sources of air pollutants. This could be by building new homes, workplaces or other development in places with poor quality.

In this case, it is not considered that the proposal will have any significant impact upon existing, local air quality levels.

Construction activities such as dust generation and vehicle/plant emissions will be short-term and can be appropriately controlled via best practice measures.

In terms of operational impact, as the development is proposed to be car free, with only two accessible spaces and with infrequent residential transfer arrangements, any impact as a consequence of vehicular traffic is considered relatively low.

With respect to the impact upon ecology, precautionary measures will be taken in relation to any impact upon any flora or fauna via the information detailed within the ecological appraisal and arboriculture report required to be submitted.

The ecological appraisal highlights that the site has limited potential to support protected species and mitigation will be implemented including habitat retention to avoid significant effects, it is not considered that an EIA is required on the basis of ecology.

Any proposed tree loss will be assessed and will need to be appropriately mitigated via tree replacement either on or off site where necessary.

In terms of archaeology and heritage, the site does not contain any designated heritage assets or archaeological impacts that would be affected by the development of the site.

A Heritage Appraisal will be submitted as part of the application. This has identified that no heritage designations within the site, although the site is situated within the Victoria Park Conservation Area.

The site can however be classed as non-listed designated asset, due to site being of architectural and historic and social interest. However, it is considered that there is capacity for change within the site which could enhance the heritage value and interest of non-listed designated assets.

An Archaeological Desk Based Assessment will accompany the application given that the design involves the demolition of St. David's Hall and St. Gabriel's extension, as well as construction of the new elements and will involve breaking ground and the potential to affect any surviving archaeological remains.

The information submitted to date indicates that the site has the potential to retain buried remains of an ancient township boundary and late eighteenth century former fields and also the potential to contain a tollgate lodge and potential remnants of Woodthorpe Hall and outbuildings.

It is considered that any remains are likely to be of local significance only and the exact scope of any further investigations can be determined by Greater Manchester Archaeological Advisory Service (GMAAS), with any necessary monitoring, watching brief or mitigation likely to be controlled through standard planning conditions

In terms of flood risk, the entire site and immediate surroundings are situated within Flood Risk Zone 1 – low probability of flooding.

A Flood Risk Assessment has been prepared to assess the potential impacts and indicates that the majority of the site has a very low pluvial food risk and the areas within the site that have a higher risk of pluvial flooding are due to topography rather than considerable overland flow. The proposed drainage strategy will ensure no flood takes place on site for all events up to and including the 1:100 year plus 40% climate changes.

As the site is brownfield, in line with Core Strategy policy, the development is to restrict flows by 50% compared to existing discharge rates, which in turn would significantly reduce local surface water flood risk in the area.

Through the implementation of mitigation measures such as permeable paving, soft landscaping and attenuation, the risk of flooding from surface water is considered low and the proposed development will adhere to the drainage hierarchy.

It has been further identified that the proposed development will not result in an increased risk of flooding off-site and whilst the site is located within an area at risk of flooding from reservoirs, the submitted FRA considers that through regular maintenance and inspection of reservoirs by appropriate bodies, there is a low risk of flooding via this source.

The foul water network is proposed to discharge to the Severn Trent network, with discharge rates to be agreed with Severn Trent.

With respect to visual amenity, it is acknowledged that there will be some impact, particularly when viewed from Oxford Place. It is considered however that through effective landscaping, good design, the use of appropriate materials and appraisal of the heritage context, any impact can be mitigated. Any effects are therefore likely to be minimal, subjective and of local significance only.

In terms of noise impact, a Noise Impact Assessment has been undertaken.

The assessment considers that noise impacts associated with the proposed development are likely to be acceptable. Notably, those associated within the construction phase, vehicular movement and fixed plant equipment.

Through the implementation of standard mitigation measures i.e the implementation of a Construction Environmental Management Plan, it is believed that noise impact associated with the development will be appropriate for residential development, localized in nature and in accordance with the City Council's criteria.

The proposed development due to its situation has the potential to affect daylight/sunlight of neighbouring occupiers.

The assessment undertaken so far anticipates that the construction or operation of the proposed development will not have a significant adverse impact on daylight/sunlight amenity for neighbouring receptors. In any event, any impact is not considered to be of more than local significance to warrant an EIA.

In terms of any impact as a consequence of wind and any impact on the local microclimate, the marginal increase in scale and mass when compared to the existing context is not considered significant. The proposed development is not of the scale usually expected to result in wind effects and as such an EIA is not considered to be required.

On balance, taking account of all of the above, it is believed that any impacts will be of a localised nature and not give rise to any significant effects on the environment, requiring evaluation by an EIA.

(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

The impacts associated with both construction and the operational elements of the entire development will be thoroughly assessed and understood. Through appropriate best practice measures and successful mitigation, an EIA is not considered to be required.

(v) Probability of Impact

Through assessment of the detailed, specialised, technical documents that will accompany the planning application, any impact will be understood. It is anticipated that the effects be of a localised nature and for a short duration only. Through appropriate best practice measures and mitigation, the impacts are considered acceptable and therefore do not require assessment through an EIA.

(vi) Expected onset, duration, frequency and reversibility of impact

Any impact as a consequence of the above are likely to be short term or temporary. As such, it is not felt an EIA would be required on this basis.

(vii) Cumulation of the impact with the impact of other existing and/or approved development

As already outlined within this screening opinion, there are no other developments either located nearby or in the pipeline that are anticipated to adversely affect the environment as a consequence of cumulative impact. An EIA is not therefore required on this basis.

(viii) Possibility of effectively reducing the impact

Reducing the impact is possible via best practice measures, effective protocol and mitigation as outlined within the application documentation. An EIA would not therefore be required on this basis.

6. Mitigation if Development is not EIA Development ‘General Provisions relating to Screenings; under Part 2, Regulation 5

As required by the EIA Regulations and as prescribed by National Planning Guidance, if it is to be determined that the proposed development is not EIA development, a screening opinion should provide details of the proposed mitigation measures envisaged to avoid or prevent what might otherwise have been significant adverse effects on the environment.

As already outlined, any impacts are considered to be minimal, temporary or localised in nature. It is acknowledged however that there will be some environmental impacts, but these can be suitably mitigated to reduce any likely effects of the proposed development. These are set out below, with any

necessary mitigation possible through the attachment of planning conditions where necessary.

Visual Amenity

Consideration of the impact of the proposed development upon nearby occupiers or upon the appearance of the street-scene is required and can be achieved by a robust assessment contained within a Design and Access Statement and Heritage appraisal.

It is considered that through effective and robust landscaping, tree planting, boundary treatment and control of building materials, any negative impact can be suitably mitigated.

Landscaping and external materials to be used can be appropriately controlled through the imposition of suitable planning conditions.

Archaeology

Through best practice measures to be implemented via a Construction Environmental Management Plan and through archaeological monitoring, any impact during the construction phase can be suitably mitigated

Ecology

As outlined, mitigation should include a robust landscaping plan, construction management best practices, the possible need for bat licenses, ecological supervision, appropriate lighting, attention to the provisions contained within the Wildlife and Countryside Act (1981) and Reasonable Avoidance Measures (RAMS) during construction.

Daylight/Sunlight

No mitigation required.

Drainage and Flood Risk

The site is located within Flood Zone 1 – low risk of flooding.

Mitigation is however still necessary and is to include best practice construction management measures, improvement to surface water run-off rates and regulation maintenance of drainage systems.

Ground Conditions

The applicant has submitted Desktop Study which is to be supplemented by further intrusive Site Investigation and Remediation where necessary. Further mitigation in the form of pollution prevention measures, implementation of a Construction Environmental Management Plan and Material Management Plan should be carried out and can be controlled by appropriate planning conditions.

Noise and Vibration

The control of noise can be mitigated by implementing the measures detailed within the Acoustic Report, the appropriate design, control and insulation of plant equipment, suitable glazing and ventilation and through the effective implementation of a Construction Environmental Management Plan. Appropriate planning conditions can secure this.

Air Quality

There are likely to be impacts on air quality during both the construction and operational phases of the development. An effective Construction Environmental Management Plan will be introduced. Appropriate planning conditions can secure this.

Wind Microclimate

No mitigation required.

Highway Impact

Through appropriate construction management, to be implemented via an effective Construction Environmental Management Plan and Construction Traffic Management Plan, any impacts can be appropriately controlled.

A restriction of car ownership for occupiers and through the promotion of a travel plan can further limit any impact. Appropriate planning conditions can secure this.

Climate Change

An electric vehicle charging point can be included for one of the accessible spaces. An appropriate planning condition can secure this

7. Conclusion

This response is based on the EIA Screening Report submitted by Avison Young dated 3 May 2022

Following consideration of the submitted information and an appraisal against the EIA selection criteria within the Regulations, the proposal taken either on its own or cumulatively, is not considered likely to give rise to significant environmental effects.

The technical assessments undertaken to date show that any potential for significant effects can be appropriately managed through best practice measures and suitable mitigation where necessary. The impacts are not of a level or complexity that an Environmental Impact Assessment would be necessary to evaluate them.

It is therefore the formal opinion of Manchester City Council, as Local Planning Authority that an Environmental Impact Assessment is not required on this occasion.

The City Council as Local Planning Authority reserves the right to seek an Environmental Impact Assessment of any future planning submission on this site. Moreover, this letter does not infer or imply in any way that planning permission would be granted for the proposed development.

Signed:

A handwritten signature in black ink, appearing to read 'D W Jones', is written over a faint, circular official stamp.

Derek Jones
Section Planning Manager
31 May 2022