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Our ref EKPS/210502/EP

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Dear Lucy,

Commercial Development at Land off bound by King Street West, St Mary's Parsonage, Garden Lane and Smithy Lane, M3 2JP
Environmental Impact Assessment (EIA) Screening Opinion Request

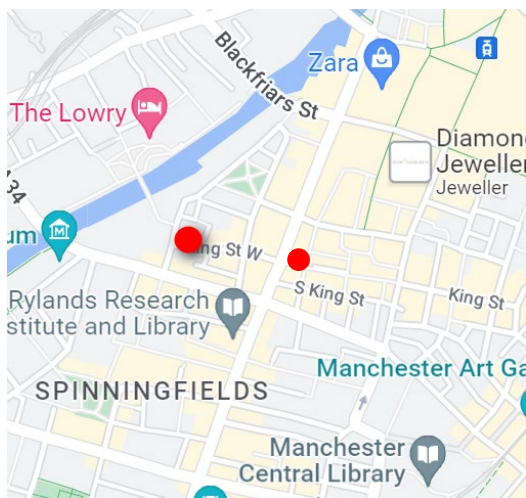
On behalf of our client, Property Alliance Group, we write to request a formal Environmental Impact Assessment ("EIA") Screening Opinion in respect of Proposed Development at the above site.

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 0.25ha (0.61 acres) and is bounded by King Street West, St Marys Parsonage, Garden Lane and Smithy Lane within Manchester City Centre ("the Site"). **Figure 1** below shows the site context whilst **Figure 2** shows the indicative site boundary (taken from Google maps).

The site is currently occupied by a cluster of buildings, including 31-33 King Street West, a former carriage works and warehouse buildings (with an external courtyard) (all Grade II listed) and 27-29 King Street West. The ground floor of the buildings are currently in commercial / retail use with offices on the upper floors.



^ Figure 1



^ Figure 2

A site location plan is enclosed with this letter.

Development Proposals

Our client is seeking full planning permission for the redevelopment of the Site for commercial development ("the Proposed Development"). The proposals comprise the erection of a 14 storey office building, following the demolition of existing buildings at 27-29 King Street West and 31-33 King Street West, and the refurbishment of existing buildings at 3 Smithy Lane and Carriage Works on Garden Lane / St Mary's Parsonage with ground floor extension with front of house and commercial floorspace at ground floor.

The proposals also include secure cycle parking, hard and soft landscaping and the removal of the link bridge from Carriage Works on Garden Lane / St Mary's Parsonage to 3 St Marys Parsonage.

All commercial land uses will comprise Use Class E, as per The Town and Country Planning (Use Classes) Order 1987, as most recently updated via The Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020.

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 Environmental Impact Assessment 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 does not exceed the thresholds set out in Schedule 2 10(b) of the EIA Regulations as it comprises a commercial development on an urban site of 0.25 hectares.

Local Significance / Sensitivities

Turning to the significance of the project; it's location (within an environmentally sensitive area); 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 which is not particularly environmentally sensitive; and the development is located on a previously developed site for a public facing use (and therefore unlikely to give rise to unusually complex and potentially hazardous effects).

Indicative Screening Thresholds

The Planning Practice Guidance 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 is 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).*

Furthermore 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.

Given that the Site comprises an urban block made up of a series of buildings of up to 4 storeys in height, it is noted that there will be a change in the scale of activities taking place at the site. Notwithstanding, it is important to note that the site is located in an established urban area, where redevelopment is expected to take place and, with this in mind, it is considered that the types of impact are not anticipated to be markedly different in scale or nature.

Notwithstanding, the key considerations identified above are considered in further detail overleaf.

Technical Considerations

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 the refurbishment of existing buildings and the erection of a 14-storey office building, following the demolition of a building fronting Motor Square.

The proposals also include secure cycle parking, hard and soft landscaping and the removal of the link bridge from Carriage Works on Garden Lane / St Mary's Parsonage to 3 St Mary's Parsonage.

The Proposed Development has been sensitively designed to respond to the urban context of the Site, with the proposed building height of the new office building being comparable to the surrounding approved / emerging context.

Consequently, it is considered that the physical scale of the development propose 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

Traffic

Focus TP have considered whether the Proposed Development has the potential to create significant effects on the environment in relation to traffic and transportation.

An environmental impact can arise through the extra vehicle trips that might arrive at the site. The potential implications that may arise from additional traffic have been described in the reference document "Guidelines for the Environmental Assessment of Road Traffic" produced by the Institute of Environmental Assessment (March 1993) (now Institute of Environmental Management & Assessment ("IEMA")).

Transport related environmental impacts are typically associated with changes in local traffic demand, both in terms of the total number of development vehicles and the type of vehicles generated (i.e. the proportion of larger HGV service vehicles). Key impact types to be considered in traffic related environmental assessment are as follows:

- Changes in development traffic demand impacting on prevailing highway operating conditions, such as accident risk and network congestion & delay on key links in the immediate vicinity of the proposal site and further a-field;
- Changes in development traffic demand impacting on other local road network users and the immediate community, resulting in reduced amenity (e.g. community severance, pedestrian delay / intimidation, etc.);
- Changes in development traffic demand resulting in noise effects at surrounding / frontage properties to key access road corridors; and,
- Changes in development traffic demand and congestion resulting in local air quality effects at key local network links and junctions.

The proposed Reedham House scheme would deliver the redevelopment of this important site within Manchester City Centre and represents an opportunity for the promotion of sustainable, modern car free development. Due to the combination of the site's city centre location and the 'car free' nature of the development proposals, the scheme would not result in a material impact on the operation of the local road network and therefore any planning application would not need to include supporting detailed highway network capacity analysis and environmental appraisal of traffic related effects.

Notwithstanding the above, it is proposed that the formal planning application would be supported by Transport Statement and Travel Plan reports, providing information with respect to the following key matters:

- A description of the site location and planning history of the application site - including a review of the nature of the surrounding highway network and a consideration of relevant local road safety history.

- An accessibility audit of the proposal site location, setting out the range of opportunities available to encourage travel to / from the site by sustainable alternative travel modes to the private car and the delivery of a Travel Plan to manage resident travel demand.
- A review of the key highways and transport aspects of the proposal scheme including main site access arrangements, supporting sustainable transport initiatives and measures to accommodate large vehicle servicing.
- A review of the zero on-site parking approach proposed for the site both in terms of current local on-street parking restrictions and what opportunities exist for local contract parking.
- Travel Plan identifying the site's excellent accessibility due to its city centre location and proximity to high frequency public transport infrastructure. The location of the application site will be an influential factor for day one of operation in the way residents travel. The Travel Plan will seek to build on the excellent sustainable location of the site and promote existing facilities. The measures proposed would be taken from latest government and local authority guidance and best practice. The Travel Plan will also include recommended management and monitoring measures for adoption upon occupation of the site, including targets survey recommendations and an implementation plan.

It is also considered that there are no highly sensitive receptors in the immediate vicinity that could be affected by traffic movement. Any effects of traffic / servicing noise will be picked up within the scope of the proposed noise assessment.

With consideration to the above narrative, the Proposed Development is not anticipated to result in a significant increase in traffic and therefore will not meet the IEMA traffic change thresholds for consideration of environmental effects in the EIA. It will therefore not have any significant environmental effects relating to transport or highways more broadly.

Emissions

The site is located within close proximity to the Greater Manchester Air Quality Management Area ("AQMA") and consequently, Redmore Environmental have been appointed to undertake an Air Quality Assessment.

The works being undertaken during the construction phase will include demolition work, earthworks, construction and trackout. It is anticipated that dust and particulate matter emissions produced during construction phase activities would be inherently controlled through the implementation of a Construction Environmental Management Plan ("CEMP"). Therefore, the effects of dust and particulate matter emissions released during the construction phase of the Proposed Development from on-site activities are unlikely to be considered significant.

Road traffic generated by the Proposed Development during its construction phase is currently unknown. The implementation of a CEMP including a strategy for traffic management to define local routes to be used by HGVs generated by construction activities can also be implemented to reduce possible impacts as required.

During the operational phase, it is envisaged that the Proposed Development will result in not significant impacts on nearby receptors and the residual effects are considered to be not significant within it being a car-free development. Further to this a sustainable travel plan will be included further reducing the air quality impacts of the Proposed Development.

An Air Quality Assessment will be submitted as a stand-alone report to fully assess the above and accompany the Planning Application. Additionally, within this, a baseline assessment will be undertaken to identify any existing air quality issues and a modelling exercise will be completed to allow for a site suitability assessment. Appropriate mitigation will be included within the design following the Site Suitability assessment to ensure Air Quality Objectives are met for the proposed end use.

Noise

A noise assessment has been undertaken by Sandy Brown in relation to noise from and on the Proposed Development. This assessment is informed by the results of a noise survey, undertaken between 15:45 on 27 January 2022 to 15:30 on 2 February 2022, to quantify the existing background and ambient noise environment at the proposed sensitive receptors.

The ambient noise levels measured have encompassed the existing noise sources surrounding the site inclusive of existing plant noise. The outcome of the noise survey has informed the design of proposed plant based upon the requirements of MCC guidance to mitigate any potential impacts on existing receptors.

Accordingly, it is considered that the Proposed Development is not anticipated to have any significant environmental effects in respect of noise.

Contamination

A Phase 1 Geoenvironmental Site Assessment has been completed by E3P and will be submitted as part of the planning application.

The report concludes that based on historical and current land uses, it is considered unlikely that the site would be classified as Contaminated Land under Part 2A of the Environmental Protection Act 1990. Furthermore, the overall risk from land contamination at the site is considered to be low for the current development, as it is covered by buildings limiting the possibility of human contact with the soils, as well as reducing the risk of significant rainwater infiltration leading to leaching.

With regards to the redevelopment of the Site, the overall risk is assessed to be moderate, with some specific potentially high risks, but this assessment would need to be confirmed by appropriate intrusive investigation, testing and assessment of the results of the investigation.

As such a specialist site investigation contractor will undertake a Phase 2 intrusive site investigation. This will be submitted to the Council at the appropriate time for assessment, including by the Environmental Health department.

Given there is not a high level of contamination associated with the Site or the Proposed Development, there is currently no suggestion that the redevelopment of the Site is inappropriate due to contamination or similar technical constraint.

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.

Summary and Conclusions

The Proposed Development involves the redevelopment of a previously developed site in an urban location for a commercial development comprising a new 14 storey building and the restoration of existing buildings. .

The Proposed Development is not of a type listed in Schedule 1. The Proposed Development does not fall within Schedule 2 development under Section 10 'Infrastructure Projects'.

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 (07500 104178) or by email (ellie@euankellie.co.uk) should any matters arising from the application require clarification.

Yours faithfully,

A handwritten signature in black ink, appearing to be 'Ellie Philcox', written in a cursive style.

Ellie Philcox MRTPI PIEMA
Director
ellie@euankellie.co.uk

Enc. Site Location Plan