

Manchester City Council  
Development Management  
PO Box 532  
Town Hall  
M60 2LA

**Date:** 8 March 2021

**Our ref:** 63145/01/SPM/DHo/~~19476395v1~~

**Your ref:** 129444/FO/2021

Dear Sir/Madam

## **Land at Grimshaw Lane – Environmental Impact Assessment Screening Addendum**

On behalf of Hale and Canmoor Developments, we hereby provide an opinion as to whether there is a requirement for an Environmental Impact Assessment [EIA] in respect of the proposed industrial/business development at land north-east of Grimshaw Lane, south-east of the Rochdale Canal. The site is located within the Newton Heath area of Manchester.

To enable your consideration of this issue, we set out below the following information:

- 1 Description of the site and its surroundings;
- 2 Description of the proposed development; and,
- 3 Review of the requirement for an EIA.

Item 3 is dealt with by reference to a preliminary review of the site and its surroundings and a consideration of the issues set out in the Town & Country Planning (Environmental Impact Assessment) Regulations 2017 [EIA Regulations] which take account of recent case law.

In summary we consider that the proposed development does not give rise to the need for an EIA. We outline below the analysis undertaken to reach this conclusion.

### **1. Description of the site and its surroundings**

The site is approximately 10.46 ha in size, and is broadly triangular in shape. Approximately 50% of the site is occupied by the redundant three/four-storey former Mather and Platt industrial foundry/engineering works which sits within the central part of the site. The foundry closed in 2017 and is understood to have been in a very poor state of disrepair. The buildings and structures on the site have recently been demolished following the prior notification of the Council. This work was completed very recently and some of the technical reports were written when the buildings were still present (or in the process of being demolished). For the purpose of this screening opinion, and in order to ensure that the worst-case scenario is considered, environmental effects arising from the demolition are considered as part of the construction phase associated with the development.

The balance of the site is occupied by disused brownfield scrubland/grassland.

To the north-west of the site is the Rochdale Canal and Public Right of Way [PRoW] (No. 66). On the north side of the Rochdale Canal lies industrial/employment development, and beyond this the residential area of Newton Heath.

To the immediate north-east of the site is Ten Acres Lane beyond which is the Ten Acres Lane Sports Complex, which provides indoor facilities for martial arts, as well as a 3G football pitch. A small residential cul-de-sac, Makkah Close, is located to the immediate north of the sports complex (to the immediate east of the application site). To the north-east of the site (beyond Ten Acres Lane) there is also a large area of grassland/woodland, which adjoins the Rochdale Canal. The south-east the site is adjoined by a large estate of two-storey family housing.

To the south of the site is a large bakery and distribution unit which was built in 2010, and beyond this further industrial and employment uses with buildings of varying heights, form and external materials.

The site is directly accessed from Grimshaw Lane (to the south-west), which links to Oldham Road (A62), approximately 750 m to the north, which in turn leads on to junction 22 of the M6 motorway. At present, there is no existing vehicular access to the site from Ten Acre Lane to the north-east.

There are no listed buildings or scheduled monuments on or adjacent to the site, nor is it within or adjacent to a Conservation Area.

There is some existing tree coverage on the site, with a grouping of trees in the north-east part of the site, and the rest focused around the boundaries.

## **2. Description of the proposed development**

The proposal, outlined within this letter, is to redevelop the site for modern employment/industrial purposes, including the erection of 12 industrial units (use classes E (light industrial), B2 and B8 with ancillary offices), associated vehicular parking, service yard areas and landscaping.

The development will make use of the existing access arrangement at Grimshaw Lane, which will be upgraded as appropriate. The proposed site layout includes a number of industrial units, which range between 470 m<sup>2</sup> (GIA) and 13,564 m<sup>2</sup> (GIA) in size, to meet the varying tenant requirements and market demands. The larger units are positioned in the eastern part of the site, and would have a haunch height of 12 m and ridge height of 14m. Each unit has its own designated vehicular parking service area, accessed independently off the proposed internal site access road.

The appearance of the proposed buildings are shown on the elevation drawings submitted with the planning application. The layout is shown on proposed site layout plan (ref. PLO03D). The buildings have been orientated and positioned with all the service areas facing inwards towards the centre of the site, in order to focus the majority of activity (vehicle movements etc.) in the core of the site. The site coverage of buildings (based on their gross internal area) is 42%.

In the eastern corner of the site (which directly fronts the residential units on the eastern side of Ten Acres Lane), this area would be retained as open land, providing a sustainable drainage function. A 10-12 m landscaping buffer will delineate the north eastern boundary of the application site.

## **3. Requirement for EIA**

The development is one to which the EIA Regulations may apply because it falls within Part 10(a) of Schedule 2 of the EIA Regulations as an industrial project with a development area which exceeds 0.5ha. For Schedule

2 developments, the Regulations require that an EIA be undertaken where “*the development is likely to have significant effects on the environment by virtue of factors such as its nature, size or location*”. The criteria and thresholds in Column 2 of Schedule 2 represent the ‘exclusion thresholds’, below which EIA does not need to be considered (subject to the proposal not being in a sensitive area). Schedule 3 of the EIA Regulations set out those matters which should be considered in determining whether or not any one proposal is likely to give rise to significant effects on the environment, and thus need an EIA.

The Planning Practice Guidance [PPG] states that only a very small portion of Schedule 2 development will require an assessment (ID: 4-018-20170728). The PPG confirms that the focus should be on those effects which are significant. It provides as an Annex a series of Indicative Screening Thresholds which include indicative criteria to assist in determining whether significant effects are likely, recognising that the location and sensitivity of an asset are important considerations. This sets out that for industrial projects under 10(a) a site of 20ha for new development is an indicative threshold for the preparation of an EIA. The development site is approximately 10.46 hectares in area and as such falls significantly short of the indicative threshold for an EIA set out in the PPG.

When screening Schedule 2 projects, the local planning authority must take account of the selection criteria in Schedule 3 of the EIA Regulations. This identifies three categories of criteria, namely:

- 1 Characteristics of the development (such as size, cumulative effects, use of natural resources, production of waste, pollution and nuisances, risk of accidents and risk to human health);
- 2 Location of the development (by reference to the environmental sensitivity of the area); and,
- 3 Characteristics of the potential impact (having regard in particular to the extent of the impact, its transfrontier nature, magnitude and complexity, probability and duration, frequency and reversibility).

The PPG also identifies that the potential increase in traffic, emissions and noise are likely to be key issues to consider in relation to industrial projects [ID: 4-057-2070720]. The most pertinent environmental effects relevant to this site are identified and considered in this letter. This includes consideration of traffic, emissions and noise impact as identified by the PPG.

## **Development Characteristics**

A detailed description of the development is set out on the previous page of this letter. The following section of the letter addresses the ‘Characteristics’ of the development as set out in Schedule 3 of the EIA Regulations.

The development site is 10.46 ha in total and proposed development will create circa 42,789 m<sup>2</sup> of flexible light industrial/employment floor space. The scale of the development does not, in itself, trigger the need for an EIA.

A total of 12 units are proposed in the dimensions and sizes for these units are set out in the accompanying Design and Access Statement. Unit sizes range between 470 m<sup>2</sup> (GIA) to 13,564 m<sup>2</sup> (GIA). The largest units are located on the north-eastern part of the site, adjacent Ten Acres Lane.

The accompanying planning application seeks permission for a flexible Class E/B2/B8 permission. Class E includes a range of commercial uses, however the purpose of this screening opinion it is assumed that permission (within class E) will only be granted for light industrial uses (and not for example, retail).

Class B2 (General industry) uses are generally not compatible with surrounding residential uses and, given the end operator is not known, a wide variety of development characteristics (particularly in terms of noise, air quality, risk of accidents and impact upon human health) could come forward within the scope of such a planning permission. The assessment in the following sections considers these matters and the degree to

which effects are mitigated in the scheme, or the impacts could be adequately controlled by way of planning condition.

### **Environmentally Sensitive Location**

The PPG highlights that, for any given development proposal, the more environmentally sensitive the location, the more likely it is that the effects on the environment will be significant and will require an EIA (ID: 4-032-20170728). The EIA Regulations define Sensitive Areas<sup>1</sup>. The site is not located within or adjacent a Sensitive Area as defined by the EIA Regulations.

The site is not located in or adjacent to any Conservation Area and there are no nearby listed buildings. The closest designated assets lie almost half a kilometre away, including an early 20<sup>th</sup> century Grade II Listed church to the north-east of the site (HER 8505) and Phillips Park and Philips Park Cemetery (Grade II Registered Park and Garden) which is located circa 400 m south of the application site. Clearly, due to the separation distance, intervening built development and lack of historic or visual relationship, the application site will not have an impact upon these heritage assets.

The closest residential receptors are located approximately 20 m from the eastern boundary of the site, at Makkah Close, Staplehurst Road (both East of Ten Acres Lane) as well as dwellings fronting Ten Acres Lane itself. Given vehicular access is not taken from Ten Acres Lane, and the inbuilt mitigation provided by the site layout, it is considered that impact upon these residential properties can be minimised to a reasonable level. Specific environmental effects are considered in the subsequent sections of this letter.

There are two nationally designated wildlife sites within 5 km of the site. The Rochdale Canal Site of Special Scientific Interest [SSSI], which contains important habitats for submerged aquatic plants and emergent vegetation, sits 2 km to the east of the application site. The application site falls within the Impact Risk Zone for this SSSI. The Ecological Assessment states that development of this type does not fall under the risk category with regard to the SSSI. It is not anticipated that development will give rise to any impact upon this SSSI. The Hollinwood Branch Canal SSSI, which contains several regionally and nationally rare water plant species as a result of the high water quality, sits 3.8 km to the south-east of the application site. It is considered that the development will not impact upon this SSSI, given the nature of the development and the degree of separation.

The site is located within Flood zone 1 and is not at risk from flooding from rivers or the sea. The Rochdale Canal does not present a risk from flooding, given its water level is actively managed.

Accordingly, the proposals will have no significant adverse effects on Sensitive Areas as defined within the EIA Regulations or other statutory or non-statutory designated areas.

### **Possible Environmental Effects**

This section considers the characteristics of the potential impact from the proposed development, drawing from and informed by initial assessment work and analysis. Where mitigation measures are relevant to the Council's consideration of these issues, then these are specified.

---

<sup>1</sup> Regulation 2(1) viewable at <http://www.legislation.gov.uk/uksi/2017/571/regulation/2/made>

## **Transport**

A Transport Statement (prepared by Vectos) has been submitted with the application. As set out earlier in this letter, the application site previously comprised several large buildings as part of the former Mather and Platt works totalling around 42,800 m<sup>2</sup> of B2 floorspace.

The existing site access connects to Grimshaw Lane, which runs to the west of the site on a north-east/south-west alignment. The road is a two-way single lane carriageway operating at 20 mph. The road connects to Briscoe Lane to the south and signal-controlled junction with Oldham Road (A62) and Mossall Road to the north. The Road provides access to several commercial buildings as well as residential properties.

The site benefits from very good level of accessibility, with pedestrian connections to bus stops and cycle routes to the centre of Manchester and surrounding residential areas. In particular, the Route 66 pedestrian/cycle path sits to the immediate north of the site, delineating the Rochdale Canal. Direct access to this route can be achieved from both Ten Acres Lane and Grimshaw Lane. This is supported by the proximity to frequent bus and tram services. As such, the proximity to sustainable transport facilities ensures future employees will be able to travel by sustainable means.

Given the site is not currently operational, reference has been made to the TRICS database to establish existing trip rates. As set out in section 5.3 of the Transport Statement, when fully operational, the existing use at the site has the potential to generate 124 and 176 two-way vehicle trips in the AM and PM peak hours respectively, with 7 and 2 two-way HGV trips in the peak hours.

As set out above, the planning application seeks permission for a flexible E/B2/B8 use. Given the end users or operators of the proposed development are not known, potential trip rates from the proposed use of the site have been calculated with reference to the TRICS database. Table 5.5 sets out the net change in trips for the worst case scenario in terms of land use (E class use). If the development were to comprise entirely E class use, the development would result in an overall net increase of 154 and 23 two-way trips in the AM and PM peak hour respectively. The proposals will also result in a small increase in HGV trips with 21 and 4 additional 2-way HGV trips in the AM and PM peak hours respectively.

If the development were to comprise B2 use class only, the development would result in an overall net increase of 87 and 123 two-way trip in the AM and PM peak hour respectively. The proposals would also result in a small increase in HGV trips with 5 and 12-way HGV trips in the AM and PM peak hour respectively.

It is worth noting that if the development were to comprise entirely B8 use class, the proposals would result in an overall net reduction of 10 and 32 two-way trips. There would be an increase of 39 and 57 HGV trips in the AM and PM peak hour. This is the equivalent of one additional HGV trip between every circa 1-2 minutes.

The proposed development will make use of the existing access arrangement at Grimshaw Lane during both for the construction and operational phases of the development. The junction assessment set out within section 6 of the Transport Statement concludes that the site access/Grimshaw Lane will continue to operate within capacity following the implementation of the proposed development. The 2027 future year scenario was also given consideration, taking into account the cumulative impacts the surrounding developments. In this scenario it is considered that the proposed development would result in a negligible impact on the site access operation.

It is proposed to provide 469 car parking spaces of which 31 days will be allocated as disabled parking spaces. 86 cycle parking spaces will be provided. It is proposed that 5% of the spaces will be provided with active electric vehicle charging facilities from the outset, with additional 5% provided with passive facilities for the future. This level of parking provision is lower than that the suggested parking standards of Manchester city

Council. The Transport Statement concludes that this is an appropriate level of parking, taking into account the sustainability of the site.

All servicing and deliveries will be undertaken on-site with the loading bays/parking forecourts associated with each of the units. Footpath analysis has been undertaken to demonstrate HGVs and delivery vans can safely access and egress the loading bays for each unit.

The Transport Statement concludes that proposed development will not have a severe impact on the operation of the local highway network, and that there is no transport highways related reason as to why the proposed development should not be granted planning permission.

Cognisant with the above, and taking into account sustainability of the site, the suitability of the existing access arrangement and capacity of the local highway network, it is considered that no significant environmental effects would be generated by the development in terms of transport and highways and in the context of the EIA Regulations.

### **Air Quality**

An Air Quality Assessment [AQA] has been undertaken by Hoare Lea. The baseline assessment shows the application site is approximately 230 m south of the Manchester City Council Air Quality Management Area, declared for the exceedances of the annual mean nitrogen dioxide air quality objective. The application site is set back from major roads however, and therefore concentrations are likely to be closer to background levels.

The unmitigated risk of impacts from construction work (including demolition) are from dust soiling and ambient fine particulate matter concentrations. The AQA has identified that there is a medium risk of dust soiling impact and a medium risk of increases in particulate matter 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. These mitigation measures are set out in section 7.1 of the AQA, and include (inter-alia) implementation of a Dust Management Plan, site management procedures, monitoring, maximum speed limits for construction vehicles, a Construction Logistics Plan, a Travel Plan, Waste Management Procedures, effective water suppression for demolition activities, and re-vegetating earthworks and exposed soil stockpiles to stabilise services as soon as practicable. This list is not intended to be exhaustive and it is suggested that reference is made to section 7.1 of the AQA. The report concludes that, provided these mitigation measures are implemented through good practice, the residual impacts are considered to be not significant.

The Air Quality Assessment assumes that the proposed development will meet energy demand from a mixed approach incorporates more gas-fired boilers, electric VRF systems, electric water heaters for space and water heating. In addition, there are no on-site emissions associated with the electric systems. It is therefore unlikely that the gas-fired boilers will result in a significant impact on local air quality, and there will be no impact on local air quality from the electric systems. Therefore, no mitigation measures are required and a detailed assessment of the impact of emissions associated with the plant was screened out of the AQA. These assumptions are based on the scale and nature of the units and the end occupiers they are likely to attract. In undertaking this assessment we acknowledge that, within use class B2 (General industry), alternate (and potentially more challenging) energy demands could arise. However, it is considered that this could be adequately mitigated against (for example with flues and scrubbers), and controlled by way of planning condition.

Potential air quality impacts as a result of the additional vehicle trips associated with the proposed development of existing receptors was assessed using detailed dispersion modelling. The results of the detailed dispersion modelling show that the unmitigated impacts upon existing receptors range from negligible beneficial to substantial adverse in accordance with the relevant guidance. Based on this,

mitigation measures are required to offset the adverse impacts from the operational phase of the proposed development in relation to annual mean nitrogen dioxide situations only. These mitigation measures include:

- The implementation of the Sustainable Travel Plan to encourage use of the proposed development to achieve a modal shift away from private car journeys and to encourage more environmentally sustainable forms of travel such as walking and cycling;
- The provision of electric vehicle charging points;
- Ensuring the vehicle fleet of future tenants is compliant with the latest emissions standards; and
- Ensure that a proportion of the vehicle fleet of future tenants are electric vehicles.

The AQA concludes that, provided the recommended mitigation measures are implemented, air quality should not be viewed as a constraint to planning and the proposed development conforms to the principles of the National Planning Policy Framework and Manchester City Council's Development Plan.

Based on the above, there are no significant environmental effects arising from air quality, and therefore matters relating to air quality do not trigger the need for EIA.

## **Noise**

A Noise Impact Assessment [NIA] has been submitted with the application. Monitoring was undertaken at the site between 6<sup>th</sup>-9<sup>th</sup> November 2020 determine the weekday and weekend noise climate. It is considered that the lowest background sound levels will occur at the weekend. It is of note that the consented employment uses at the site were not in operation at this time, likely resulting in lower levels of noise than would have been typical in previous years.

The general ambient noise climate across the site is attributable to traffic flows on Grimshaw Lane, Ten Acres Lane and other roads in the vicinity of the site. Background noise levels at the site are determined by surrounding commercial premises and that A6010 to the west and A62 to the north.

For both daytime and night time, a representative background sound level of 44 dB at the nearest dwellings was considered to be representative, although there were periods when background sound levels were considerably higher.

Some transfer to outside productivity within the proposed buildings will be determined by the sound reduction provided within the building fabric and by the distance between the building and the receptor. The nearest dwellings on Makkah Close approximately 25 m from the north-east elevation of proposed Unit 4 (13,564 m<sup>2</sup> (GIA). Similarly, the nearest dwellings in Staplehurst Road 25 m from the north-eastern elevation of Unit 5 (11,483 m<sup>2</sup>).

All of the remaining units are set back from the boundary and so will benefit from significantly greater distance attenuation along with screening provided by units 4 and 5. Dwellings to the north-west of Bower Street will be much further away at approximately 110 m from unit 4.

The buildings will be constructed from steel frame with cladding. The NIA has assumed that the cladding will be composite thermal panels within the minimum manufacturers rated sound reduction level of  $R_w$  27/mean 25 dB(A). The NIA has also assumed that the worst case scenario in terms of noise generation for large manufacturing workshops of this size and type would be in the range  $L_{Aeq}$  75-77dB with an overall mean level of  $L_{Aeq,1hr}$  76dB and highest maximum levels in the range  $L_{Amax}$  90 – 95 dB. On this basis, the NIA concludes that the breakout sound just outside the building, would be approximately 45 dB. This is just 1 dB higher than the background noise level. At the nearest sensitive dwellings of Makkah Close in Staplehurst Road the assessment indicates this results in a low impact during both the day and night. Therefore, based

on reasonable worst-case assumptions, it has been demonstrated that noise breakout surrounding residential receptors would not exceed background noise levels. The end operators are not known at this stage and it is acknowledged that in theory certain B2 (General industry) operations could generate higher levels of noise than those maximum parameters which the NIA has assumed (based on the size of the units and the operators they are likely to attract). However, it is considered that additional mitigation (for example insulation with a higher sound reduction level) to be provided in these instances, and this could be secured by way of planning condition.

As illustrated in the proposed site layout plan, HGVs will enter the site from the south-west, using the existing access at Grimshaw Lane. None of the service yard will be visible from the nearest dwellings on Makkah Close or Staplehurst Road, due to the screening effect of Units 4 and 5. However, dwellings on Bower Street to the north-west at a similar distance will have a line of sight the service yard of Units 3 and 4.

An assessment of the noise from HGV movements at the development on the Bower Street dwellings was carried out as part of the NIA, and it is concluded that there would be a low impact on these dwellings.

It is not possible to calculate noise emissions associated with mechanical services plant at this stage, given the location and specification of these are not known. The maximum allowable cumulative noise level arising from mechanical services plant, associated with development has been determined as 41 dB. The NIA suggests that noise control measures may be required to achieve these levels and it will be necessary to review plant selections and locations during the construction phase. This can be controlled by way of planning condition.

In all cases, the calculation set out within the NIA indicate that noise levels would achieve a condition of 'low impact' at all times. It is important to note that this assessment is based on a worst-case scenario of engineering/manufacturing noise levels (at the highest end within the typical range), with the lowest level of sound insulation. Breakout sound levels for warehouse use would be significantly lower than indicated by the assessment.

Subject to adhering to the recommendations in respect of mechanical services plant, the NIA demonstrates that proposed development will not lead to significant environmental effects in respect of noise, in the context of the EIA Regulations.

### **Ecology, Biodiversity and Arboriculture**

An Ecological Assessment has been prepared by The Environmental Partnership [TEP] and has been submitted as part of the planning application.

The site comprises a mixture of neutral grassland, buildings, hardstanding, dense and scattered scrub, scattered trees and an ornamental hedgerow. These habitats will be lost under the proposals, resulting in a 6.04 unit (42.69%) biodiversity net loss. The client is currently exploring options for achieving 10% biodiversity net gain through the provision of a financial contribution to a third-party landowner for biodiversity offsetting.

Best practice tree protection measures are recommended for any retained trees and hedgerows within or adjacent to the site. Best practice pollution prevention measures are recommended to minimise impacts Rochdale Canal Stotts Lane – Ducie Street Basin Site of Biological Importance (a non-statutory designation) which lies 10 m from the site.

No impact to any other designated wildlife sites are anticipated as a result of the proposals, due to the distance from the site. There are no anticipated implications with regard to amphibians, badgers, invertebrates, otters and water voles as the species are considered unlikely to be present on the site.



No bat roosts have been identified on the site. Some trees were identified as having low bat roost suitability. In addition, some of the structures and buildings on the site were identified as having moderate bat roost suitability. Therefore, all tree felling and demolition works have been undertaken with the implementation of Reasonable Avoidance Measures under the supervision of a licensed bat consultant. In addition, the proposals will incorporate bat boxes on new buildings/retained trees to mitigate for these losses and enhance roosting opportunities at the site. In addition, sensitive lighting design will be implemented to minimise light spill to Rochdale Canal.

The loss of dense scrub on the site could result (without mitigation) in disturbance to nesting birds and hedgehogs. Pre-commencement checks for the species will be carried out prior to site clearance. Gaps under boundary features will be created to enable hedgehogs to move freely through the site. Bird boxes will be installed on the site to mitigate for the short-term loss of nesting habitats on the site and to enhance nesting opportunities at the site.

A Reasonable Avoidance Measures Method Statement [RAMMS] will be implemented to minimise impacts to reptiles during site clearance.

An Arboricultural Impact Assessment has been prepared by Bea Landscape Design Ltd. It is understood that none of the trees within the application site are protected by way of Tree Preservation Order, and the site is not within a Conservation Area. The proposed development will require the removal of 44 individual trees, 16 groups of trees and the scrub woodland. A number of these trees were deemed unsuitable for long-term retention as a result of the tree surveys, and the removal of these trees will be required in any case, due to their poor condition. The remaining trees were assessed as being moderate to poor in value.

Mitigation for the loss of these trees to facilitate the development will be provided in the form of replacement tree planting within the soft landscaped areas, notably in the north-eastern site boundary and at the Grimshaw Lane site access point. These tree species will be in keeping with the character of the surrounding area.

As part of the proposed development, it will be necessary to undertake pruning to reduce the risk of hazards during the operational phase. In addition, it will be necessary to undertake pruning to a small number of trees in order to minimise the potential for damage to branches during access in the construction phase. The tree pruning required is likely to be of a minor extent and is not considered to have a significant impact on the long-term health and visual quality of the retained trees.

The proposed development has been designed to avoid the need for major works (during the construction phase) within the root protection area of the trees to be retained. There is however a small number of trees which require work to be undertaken within close proximity to the root protection areas. In these cases, special construction techniques will be used to protect the trees and mitigate against the risk of root damage.

As set out above, the arboricultural and ecological impacts of the scheme can be adequately mitigated, and it is anticipated that this mitigation be secured by way of planning condition. In addition, an off-site contribution will be made to provide an overall biodiversity net gain of 10%, which represents an overall betterment in ecological terms. Based on the above, it is not anticipated that there would be any significant environmental effects arising from ecological or arboricultural impacts, in the context of the EIA Regulations.

### **Heritage and Archaeology**

A Heritage and Archaeological Assessment, prepared by BSA Heritage, has been submitted with the planning application. As set out in the assessment, no designated heritage assets lie within or close to the application

site, and there are no scheduled monuments conservation areas within a kilometre radius study area. No locally listed structures sit within or adjacent the site.

The application site contained the former Mather and Platt's Park Engineering Works factory from the early 20<sup>th</sup> century and three of its later, inter-war structures remained on site when it was visited in October 2020. These structures have been demolished, following consent from Manchester City Council.

The Assessment identifies that, although not designated, the Rochdale Canal has historic value as a non-designated heritage asset. The Canal runs from east to west to the immediate north-west of the site, with two sets of locks located north of the site boundary. The Assessment considers that the proposed development could be considered to result in a 'minimal' level of harm to the canal's setting. The Assessment recommends that an interpretation board be positioned adjacent to the canal, setting out the history of the canal and the Park Engineering Works.

In terms below-ground heritage, there is little indication of pre-modern archaeological potential in the study area. The development of the site in the 20<sup>th</sup> century is likely to have truncated any earlier remains across much of the site. Given this, the Assessment suggests that no further archaeological work should be required for the site prior to the granting of planning permission. It does however recommend that the south-eastern tip of the site (closest to the course of the Roman road), be the subject of archaeological monitoring during the construction of the detention basin. It is considered that this can be secured by way of planning condition. It is worth noting that the proposed layout has been designed so as not to include any built development in this area.

In summary, the proposed development represents a low level of impact to the setting of a non-designated heritage asset (Rochdale Canal), which would be partly mitigated by the provision of an interpretation board to aid in the understanding of the site's history. The archaeological potential of the application site as a whole is minimal, and the area with archaeological potential will be subject to archaeological investigation during the construction period.

On this basis it is considered that there are no significant environmental effects in respect of above-ground and below-ground heritage that would trigger the need for EIA.

## **Crime and Socio-Impacts**

At present, the application site is in a poor state. It comprises unkempt and poorly overlooked land, which provides opportunities for antisocial behaviour and crime. It does not serve a recreational purpose. Despite existing boundary treatment, due to the size of the site and the lack of natural surveillance, it is difficult to fully secure the site and prevent trespassing. Not only does this represent a danger to those who would trespass into the site, but it increases the probability of crime and the fear of crime in the surrounding footpaths and roads.

The redevelopment of the site for employment uses will create footfall and natural surveillance in and around the site, which will eradicate the threat of crime and antisocial behaviour within the site, and reduce the potential for crime and fear of crime in the footpaths and streets surrounding the site. In the same token, the redevelopment of the site will improve the appearance and reputation of the local area.

The small section a public footpath in the north tip of the site (which provides access to the Rochdale Canal and Ten Acres Lane), will be retained and enhanced as part of the proposed development.

In addition, the proposed development is likely to bring high numbers of jobs to the area, many of which are likely to be genuinely accessible for local people. Given the proximity of residential uses in the area, these jobs would represent a particularly attractive proposition for those able to access the site on foot.

Taking into account the above, it is considered that the proposed development represents a clear betterment in terms of crime and socio-impacts. In this context, it is considered that the effects of the proposed development do not trigger the need for a need for an EIA.

### **Ground Conditions**

A GeoEnvironmental Desk Study and Ground Investigation Report has been undertaken by WYG. Due to the presence of contamination within the site, the report concludes that the overall risk to human health associated with an un-unmitigated scheme (arising from direct contact, dermal uptake, soil and dust ingestion and inhalation) is considered to be moderate/low.

The report concludes that the site may require further investigation and/or suitable mitigation to refine the risk posed to a new development, including building design and subject to mitigation comprising hardstanding cover, cover to landscaped areas, suitable new pipeline materials and use of correct PPE by development workers.

It is considered that any further intrusive investigations/remedial works can be secured by way of planning condition, and that there would not be significant environmental effects which would trigger the need for an EIA.

### **Design and Visual Impact**

The design rationale for the scheme is set out within the accompanying Design and Access Statement. The appearance of the scheme is driven by the function of the buildings, however the units will provide strong and consistent building lines to the site boundaries. The buildings are simple and well proportioned, using contemporary materials with crisp, modern detailing, and the use of various cladding profiles and colours within a considered palette. Together these elements create a strong, clear and high quality appearance.

The façade visible from outwith the site boundaries have been kept deliberately simple in their architectural expression, so as to provide a subtle and neutral visual backdrop which respects the mixed urban context surrounding the site.

The closest residential receptors, at Makkah Close, will benefit from a 10 m landscaped buffer including tree planting along the entirety of the north-eastern boundary of the site (fronting Ten Acres Lane). It is not considered that the proposed development, by virtue of its scale, form in materiality, would have an overbearing impact on surrounding residential receptors. Similarly, receptors using PRoW 66 (the former Rochdale canal towpath) to the north-west of the site, will view the site behind a row of tree planting, which will soften the appearance of the scheme.

Overall, given the historical industrial use of the site, and the surrounding commercial and industrial uses, it is considered that a scheme of this scale and appearance will not be out of keeping with its surroundings, and will represent an improvement to this unkempt brownfield site.

As such, there will be no significant environmental effects in respect of design and visual impact which would warrant the need for an EIA.

### **Other**

We have had regard to all other matters and constraints (for example flood risk, the risk of major accidents, health, climate change, the use of natural resources) which can obviously impact upon (or be impacted by) the development of the site and would be a material consideration in the context of the EIA Regulations. An initial assessment of these matters has not identified any significant effects that could give rise to the need for an EIA. A Flood Risk and Drainage Strategy has been submitted with the planning application, which

demonstrates that the development has an overall the risk of flooding both on and off site. The proposed drainage strategy will reduce both on-site and off-site flood risk. A Health and Safety Plan has been submitted with the application, which shows that all risks (including dealing with contaminated land, manual handling, use of hazardous substances, noise, dust, vibration, asbestos containing material and any other significant risks) can be adequately controlled and managed. It is also expected that any industrial uses with the potential for major accidents, would be controlled by licensing regimes to manage and minimise these risks.

## **Cumulative Effects**

We have had regard to the cumulative effects of the development. The proposed planning application (unlike the previous, withdrawn application on a smaller part of the site) encompasses what were previously three individual parcels of land. Together, these parcels represent the entirety of the vacant, brownfield land in the vicinity. This approach of comprehensive redevelopment ensures that the cumulative effects of the development can be considered in whole, as part of this individual planning application.

The surrounding built development has been in place for some time, and it is not considered that any recent or forthcoming developments give rise to cumulative effects which require further consideration, or would trigger the need for an EIA. This is particularly the case given the existing/previous industrial uses at the application site.

## **Conclusions**

At 10.46 ha, the application site falls significantly short of the 20 ha indicative threshold for EIA. The proposed development represents the redevelopment of brownfield land, with a long history of industrial uses. The most pertinent environmental effects for a development of this type have been considered in this letter, including traffic, emissions and noise impact. It has been demonstrated that all technical constraints arising from the proposed development can be adequately mitigated, and this can be secured by planning condition where necessary. The proposed development will not lead to significant environmental effects and therefore it is our view that the proposals do not represent EIA development.

We trust that you have sufficient information to determine whether this is an EIA Development as defined under the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. If you have any queries regarding any matter raised in this letter, please do not hesitate to contact us.

Yours faithfully



**Dominic Holding**  
Senior Planner

Copy: Michael Graham & Roland Craig – Hale Architects