



**MANCHESTER
CITY COUNCIL**

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17 May 2021

Our reference: JA/DMN

Your reference:

Dear Mr Cooper

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

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

**PROPOSED DEVELOPMENT AT BRUNSWICK MILL BRADFORD ROAD
MANCHESTER**

SCREENING OPINION ADOPTED BY MANCHESTER CITY COUNCIL

Thank you for your letter dated 12 April 2021, which was later updated on the 13 May 2021, in respect of your request for a screening opinion at the above site.

In coming to a formal opinion on whether an Environmental Impact Assessment (EIA) is required to support the proposed development, Manchester City Council, as Local Planning Authority, has taken into account the supporting information contained within your letter, site location plan and supporting appendices.

The proposal type is listed in category 10 (b) Urban Development Projects of Schedule 2 of the Town and Country Planning (Environmental Impact Assessment) (England) Regulations 2017. The regulations state that the threshold where a development is likely to have significant effects on the environment, by virtue of factors such as nature, size or location, are developments exceeding 150 dwellings.

Your letters of the 12 April and 13 May 2021 sets out the reasons why you believe an EIA is not required to support the proposed development.

Within the Planning Policy Guidance (PPG), general considerations relating to the need for an EIA for Schedule 2 developments is identified within paragraph 18 of the guidance. This references the selection criteria in relation to Schedule 3 of the Regulations. This criteria 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).

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

CONTEXT AND PROPOSED DEVELOPMENT

The development site, subject to this screening opinion, comprises the existing Grade II listed Brunswick Mill and adjoining vacant land. The site is bounded by Bradford Road, Beswick Street and the Ashton Canal.

Brunswick Mill is a former cotton spinning mill and forms a prominent building in the local area. Production in the mill stopped in 1967 and in recent years the building has been partially occupied on short term tenancies for a variety of uses including light industrial, music studios and storage. The remainder of the site is vacant, having been previously occupied by a former textile mill which has subsequently been demolished.

To the west, south and north of the development site is predominately residential, to the east, across the canal, is the headquarters of Pretty Little Things within the former Wellington Mill and other commercial uses.

To the west of the site, on the opposite side of Bradford Road, works are underway for 13 new homes (approved under reference 123725/FO/2019). There is further evidence of new development in the area along the Ashton Canal towards the city centre known as Stubbs Mews, an Urban Splash development for 18, 3 storey homes (ref. 122597/FO/2019).

The development site is located in a sustainable location with access to walking and cycling routes. Bradford Road connects into the Manchester inner ring road along with being 400 metres from the Holt Town Metrolink stop and 600 metres from the New Islington Metrolink stop which provides access to Piccadilly train station. A bus stop is located Bradford Road immediately adjacent to the development site.

The development site is located within Flood Zone 1 together with being in a critical drainage area.

The site is not known for its ecology, biodiversity, or contamination. The site is not located within the Greater Manchester Air Quality Management Area (AQMA).

The proposed development would comprise the redevelopment of the site including the refurbishment of the listed building to form 277 residential apartments and 2,034 sqm of commercial floorspace. A mixture of one and two bedroom accommodation is proposed.

There would be on-site car and cycle parking associated with the development along with refuse storage.

It is proposed that the listed building would be retained and converted together with two new buildings.

It is considered that the potential impacts from a development of this nature are as follows:

- Visual/landscape character;
- Heritage and archaeology;
- Ecology and biodiversity;
- Traffic and access;
- Air quality and pollution;
- Daylight and sunlight;
- Use of resources including water;
- Creation of waste;
- Land contamination;
- Impact on climate change and human health;
- Noise/dust/emissions from construction and operations of the development; and
- Cumulative impacts.

This assessment would determine whether any of the above impacts are significant in nature and warrant consideration by an EIA.

ASSESSMENT

As detailed above, an assessment would now take place based on the three criteria within Schedule 3 of the regulations.

Characteristics of Development

Size of Development

The development site is approximately 0.9ha and would see the creation of up to 277 residential apartments and 2,034 sqm of commercial floorspace within a refurbished together with two new buildings built on the vacant land.

The proposed development is above the threshold, within Schedule 2 10 (b) of the Regulations, and therefore significant effects on the environment are likely to arise.

The site is currently partially in use with the remainder of the building derelict, in a poor state of repair and has not been in active use for a long period of time. Whilst the development would represent a change in scale and character compared to the current condition of the building, it is not considered to represent a significant change, particularly compared to the scale of other nearby developments and the historical use of the site.

The appearance and setting of the listed building would change as a result of the proposal, however, it is not considered that the magnitude of the changes would warrant consideration by an EIA. The development site is located in a regeneration area where a level of development activity is likely to take place over the coming years. The site also forms part of the city centre which is dominated by dense, urban developments of different heights, scale and uses.

The impact of the changes to the façade and development within its setting would be considered through various supporting documents within the planning submission including impact on heritage, daylight and sunlight and impact on traffic.

There is likely to be some local disruption during the construction phase of the development from construction traffic and noise. However, the effects are considered to be temporary and predictable. When the development becomes operational, the vehicle trips are likely to be low given the limited on site parking provision which would encourage use of the public transport and walking/cycle routes in the area. This would minimise traffic, noise, emissions and impact on local air quality conditions.

It is noted from the supporting information that there would be no need to upgrade any local infrastructure or any major modification to the highway network that would warrant consideration by an EIA.

On this basis, whilst a proposal of this scale and nature would have some impacts (as a result of the density of the proposal) it is considered that this would not be of more than local significance and would not be of a scale of warrant consideration by an EIA.

Cumulation with other development

A screening opinion should be adopted on its own merits, and on the basis of what is being proposed, however, in judging whether the effects of a development are likely to be significant, regard should be had to the possible cumulative effects with any existing or approved development.

The development site forms part of a wider neighbourhood development strategy to regenerate this part of East Manchester.

This could result in a number of large-scale developments being brought forward at the same time in close proximity to each other.

In particular, this could result in cumulative impacts from construction traffic, noise and air quality during the construction phase together with socio-economic benefits from use of local labour. The proposals would also help support economic and population growth in the area through the creation of new homes in a sustainable location.

Although this would result in some impacts, these are not considered to be of more than local significance, would be short term and would largely be confined to the construction phase of the development.

These impacts can be suitably mitigated through coordinated management of the highways together measures to manage air quality and noise (such as dust suppression measures, not leaving vehicles idle, silencers on equipment and appropriate working hours).

In terms of the operational phase of the development, it is considered that the impacts would be less significant and would be similar in nature to other surrounding apartment buildings. There would be no onsite parking associated with this development resulting in minimal traffic and emissions.

Use of natural resources

The site is not known to contain any natural resources. In addition, given the scale of the development, it is not believed that a development of this nature would require any excessive use of natural resources in the construction process that are in short supply.

It is noted within your supporting information that any natural resources that would be needed would be minimised through sustainable design and construction. In particular, energy efficient measures, in terms of water and waste minimisation and recycling, would be employed throughout the construction and operational phases of the development.

It is therefore considered the use of natural resources would not be significant in respect of this development and therefore does not warrant consideration by an EIA.

Production of waste

Developments of this scale would inevitably create waste both in the construction and operational phases of the development.

During the construction phase, waste would be minimised and would be constrained to the removal of earth associated with below ground works and minor amounts of demolition. Any material to be moved off site would be done in accordance with the relevant regulations in relation to the disposal and treatment of waste (particularly contaminated waste).

I note the site does not present any specific challenges in this regard that are significant, unusual, complex or any more than local significance.

Once the development becomes operational, the 277 residential apartments would generate waste alongside the 2034 sqm of commercial floorspace. It is anticipated that the impacts of this are predictable and of no more than local significance. A large amount of waste that would be generated would be able to be recycled and therefore minimising the amount of waste that would have to go to landfill. It is considered that any waste that does have to go to landfill would be predictable and would not warrant consideration by an EIA.

On the basis of the above, whilst waste would be created at the development, this would be minimised through careful management of the construction and demolition process along with having a clear management strategy for when the development is operational.

As such, I consider that the production of waste would not be significant, localised in nature and predictable and therefore do not require consideration by an EIA.

Pollution and nuisances

The development, both from the construction process and the operational phases of the development, are not likely to give rise to any pollutants which are hazardous, toxic or noxious. However, there would be dust, noise, vibrations and traffic from these phases which require consideration.

In terms of the construction phase, there would be dust, noise, emissions and vibrations from traffic on the local highway network and the breaking of the ground/site excavation together with the use of plant and machinery. In order to access the site, vehicles would need to travel along routes within the New Islington and Miles Platting area which contain a mixture of commercial and residential developments. Vehicle

movements and noise is therefore likely to be noticeable to local residents and businesses.

Impact on ground conditions, particular leakages into nearby water courses and canal, can be suitably mitigated to minimise pollution of the ground water and local water courses.

This is likely to result in give rise to disruption to nearby residents and businesses and have an impact on local air quality conditions for the duration of the construction period. However, such effects would only be temporary in nature for the duration of the construction period and mitigated through a construction management plan. Therefore the impacts are considered to be predictable and do not require consideration by an EIA.

In terms of the operational phases of the development, the noise and disturbances from the development would be more domestic in nature. The scale of the development, providing 277 and 2034 sqm of commercial floorspace would have impacts of a magnitude which are predictable and not considered to be of more than significance.

Vehicle traffic and emissions from the development would be low given that vehicle movements would principally be associated with the servicing of the building and the limited on site car parking space ensuring minimal impact on local air quality conditions. There would be space for cycle stands together with being in walking distance to public transport nodes.

The proposed building would be designed to be low carbon and to minimise the effects on climate change. It is not considered that the effects of the development on climate change would be significant and any effects are predictable and can be suitably mitigated.

I consider that there would be noticeable impacts from noise, vibrations, emissions and traffic from the construction and operational phases of the development. Construction impacts would give rise to some short term disruption in the local area, however, the effects are predictable and temporary in nature. The operational phase of the development would also generated some impact but these are considered predictable and in line with the effects of other similar scaled developments in the area and would not warrant considered as part of an EIA.

Risk of accidents

The main risks in terms of a development of this nature are the contamination of land and/or water from spillages and leak. However, it is not considered that the construction or the operational stages of the development pose a significant risk in this regard given the existing conditions at the site and the substances that are likely to be used, particularly in the construction process. Measures can be put in place to minimise any risks in this regard.

It is considered that given the scale and nature of the development, such impacts are not likely to be of more than local significance, short in duration and predictable. In addition, the development is not likely to give rise to any risks to human health from dangerous substances.

Location of development

Existing land use

The development site is considered to be previously developed land and contains the grade II listed building together with vacant land. Although the building is partially in use for commercial purposes, the development site is an a regeneration area where change is expected to take place.

The site is not located within a conservation area. There are other listed buildings and structures near to the site which would be considered as part of the heritage work along with the works to the listed building itself.

Brunswick Mill has a high degree of significance but is in a poor state of replace. The building is of no more than local significance and therefore the impact on the listed building as a result of the development does not warrant consideration by an EIA.

There are no Tree Preservation Orders (TPOs) on the site. Indeed, there is limited vegetation of any quality at the site. No ecology or statutory/non statutory designations are found at the site. The impacts of any on site ecology would need to be considered as part of the ecology report along with proposals for biodiversity net gain.

It is not considered that the loss of the vegetation and impact on local ecology and biodiversity is of more than local significance and therefore does not warrant consideration by an EIA.

The site is located within flood zone 1 '*low risk to flooding*', however, the site does fall within the Manchester critical drainage area and is located in close proximity to the Canal. Whilst there would be some minor impacts from the development on the surface water run off it is not considered that the impacts would be significant in view of the scale of the development and the limited amount of hard surface around the sites. I note a drainage strategy would be prepared as part of the proposal would be devise any mitigation in this regard.

There is historical evidence of land contamination at the site. However, I am aware that this site is not particularly complex in this regard and therefore low to moderate risk. Best practice method would be employed to minimise risk to ground water. As such, the development proposal does not warrant consideration by an EIA on this basis given that the contamination levels are not significant.

The area around the development site is not known to be heavily congested with traffic and therefore both the effects of the construction and operational phase of the development would therefore be limited and effects which do occur can be appropriately mitigated. The site is in close proximity to a number of public transport interchanges which would support travel options of both construction workers and residents along with on site cycle provision and access to cycle routes.

There are nearby buildings in close proximity to the development sites. However, given the urban context of the surrounding area, it is considered that any development of this site would be compatible with the use of surrounding sites. The development to the south of the site is the only building which would be materially affected by the development in in terms of daylight and sunlight, however, the impacts in this regard are not considered to be of more than local significance and are predictable in nature.

The scale of the building is also not anticipated to impact on local tv signals.

Overall, it is considered that the development sites would have some impacts on the heritage assets and the visual amenity of the listed building and local area along with impacting on drainage and ground conditions. However, these impacts are considered to be predictable and are not considered to be of significance to require consideration as part of an EIA.

Relative abundance, quality and regenerative capacity of natural resources in the area

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

Absorption capacity of the natural environment

The sites are not designated for its ecological interest and there are no international or nationally protected sites near to the development site.

The removal of the limited vegetation on site, and conversion of the building, may result in short term, but predictable, disruption to habitats for birds and other ecology. However, the sites are not known for their ecological value and therefore such impacts can be managed as part of the process and would therefore not require consideration by an EIA.

The development site does not falls within the Manchester City Centre Air Quality Management Area (AQMA). Whilst the construction phase is likely to generate vehicles movements that would release emissions into the atmosphere, along with dust from the construction process, it is not considered that these impacts would be significant and detrimental to the environment in the long term. The impacts are predictable and manageable and are not considered to result in effects on human health which would warrant consideration by an EIA.

In terms of the occupation of the development, it is noted that the proposal would be supported by limited on site car parking. This would minimise any impact from emissions on local air quality. Cycle provision and travel planning measures would promote the sustainable location. This would minimise any significant impacts on local air quality conditions from vehicle emissions and any effects are not considered to result in impacts on human health which would warrant consideration by an EIA.

Overall, it is considered that the impacts on the natural environment would be of no more than local significance and the impacts from the construction phase can be carefully managed to minimise any impacts on and nearby sensitive receptors. On that basis the development is unlikely to give rise to any significant impacts and therefore consideration by an EIA is not considered necessary.

Characteristics of the potential impact

There would be no transfrontier impact as a result of the development and impacts of the development are local in nature.

The site clearance, and the erection of the proposed development, would result in a permanent change to the appearance of the listed building, and its setting, in the local area. Given the extent of demolition to the listed building the effects could not be reversed.

The visual impacts of the new development, particularly from the scale of the two new buildings would alter the visual amenity and character of the listed building and its

setting. However, it is considered that such changes are of no more than local significance with the development reflecting the scale, height, form and materiality of buildings in the local area and envisaged as part of the emerging regeneration aspirations for this part of the city centre.

There would be noise, vibrations and traffic from the construction and operational phases of the development along with associated impacts on the local highway network when servicing the development site. However, I consider these impacts are not of a magnitude of more than local significance and therefore do not warrant consideration by an EIA.

In terms of the duration, frequency and reversibility of the impacts, it is acknowledged that the scale of the construction activity, along with the operational phases, would have a local impact on the area that would be greater than the current land use which is a car park.

However, the construction activities would be short term, predictable and temporary in nature. When the development is complete there would be a permanent change in the visual amenity of the area which could only be reversed if the building was to be demolished.

On that basis, I do not consider that impacts from the development would be of more than local significance and therefore do not require consideration by an EIA.

Paragraph 58 of Appendix 2 of the NPPG (Screening Checklist)

Paragraph 58, contained within appendix 2 of the NPPG, provides a screening checklist as to which types of cases in which an EIA is more likely to be required for particular types of developments.

This goes on to state that an EIA is unlikely to be required for the redevelopment of land unless the new development is on a significant greater scale than the previous use, or the types of impact are of a markedly different nature or there is a high level of contamination.

For sites which have not previously been intensively developed the following criteria is relevant:

- (i) area of the scheme is more than 5 hectares; or
- (ii) it would provide a total of more than 10,000 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).

The site has been previously development. The redevelopment of the site would result in a development which would change the use, character and appearance of the listed building. The site is located in an area where change is expected to take place and the creation of 277 apartments and 2034 sqm of floorspace would represent a use of the site which is of no more than local significance.

Mitigation if development is not EIA development 'General Provisions relating to Screenings' Under Part 2 Regulation 5

Regulation 5 (5) (b) and paragraph 18 of the NPPG states "if it is determined that proposed development is not EIA development, state any features of the proposed

development and measures envisaged to avoid, or prevent what might otherwise have been, significant adverse effects on the environment”.

As detailed above it is considered that the potential impacts from a development of this nature are as follows:

- Visual/landscape character;
- Heritage and archaeology;
- Ecology and biodiversity;
- Traffic and access;
- Air quality and pollution;
- Use of resources including water;
- Creation of waste;
- Land contamination;
- Impact on climate change and human health; and
- Noise/dust/emissions from construction and operations of the development.

It is considered that whilst some there would be environmental impacts associated with this development, these can be suitably mitigated against. This is detailed below:

- Visual amenity/landscape character – The site development does not contain any significant green infrastructure or vegetation. The proposed development would alter the listed building and its setting. The development would suitably mitigate against any visual harm through careful design and change in massing of the building which can be considered through a visual assessment as such the proposal does not warrant any consideration by EIA.
- Heritage and archaeology – The listed building is grade II. A heritage assessment of the effects of the development on the significance of listed building, including the extent of any demolition works, and targeted archaeology would consider this further. Any heritage considerations are considered to be of no more than local significance.
- Ecology and biodiversity – It is considered that there would be limited impact on the ecology, however, this would be considered as part of the ecology report. The proposal has the opportunity to improve overall biodiversity at the site through new landscaping and biodiversity improvements.
- Traffic and access – Traffic and highway implications from the construction aspects of the site can be mitigated through a highway management plan being implemented for the duration of the construction works. There would be minimal impact from the operation of the development as there would be limited on site car parking together with an effective travel plan and cycle provision to take advantage of the city centre location.
- Air quality and pollution – Mitigation can be put in place to minimise impact on local air quality during the construction through a dust suppression strategy and reducing vehicle emissions through not leaving construction vehicles idle. The impact on local air quality would be minimised during the operation of the development by the limited on site car parking, promotion of the travel plan and ensure adequate ventilation is installed in the apartments to ensure existing air quality conditions and mitigated and minimise the impact on the occupants of the development.

- Use of resources including water – The proposal would not utilise any resources which are in short supply. There would also be a drainage strategy for the site which would ensure that surface water is managed effectively as part of the development.
- Creation of waste – Waste management strategies would be in place for both the construction and operational aspects of the development which includes ensuring that recycling is an integral part of the scheme.
- Land contamination – The land is not complex in this regard and mitigation can be put in place in the form of a remediation strategy to deal with any contamination found.
- Impact on climate change and human health – An Environmental Standards Assessment of the proposed development would establish measures to minimise the impact of the development on climate change and ensure that appropriate strategies are secured to ensure the building is low carbon and incorporates the most up-to-date technologies. Mitigation measures to minimise the impact on human health, particularly impacts from air quality, would be required during the construction and operational phases of the development.
- Noise – The proposal would generate a degree of noise from comings and goings in the local area both during the construction and operations of the development. Mitigation can be put in place during the construction in the form of a construction management strategy. For the occupation of the development, the building would be acoustically insulated and the comings and goings would be commensurate with the residential neighbourhood of New Islington.

CONCLUSION

This response is based on the letter of the 13 May 2021 from Mr John Cooper of Deloitte.

It is concluded that this development would have some impacts on the surrounding area. However, it has been judged that these would not be significant to warrant a formal Environmental Impact Assessment. Therefore, the opinion of the City Council, as Local Planning Authority, is that an Environmental Impact Assessment is not required in this instance.

This screening opinion relates to the requirements of an Environmental Impact Assessment only and does not imply or confer any approval of such a proposal.

I trust this information is of some assistance to you. Should you require anything further please do not hesitate to contact **Jennifer Atkinson**.



Dave Roscoe

Deputy Director of Planning