

REF: R00759/MR/APPlanning Department
City of York Council
West Offices, Station Rise
York
YO1 6GA8th April 2024

Dear Sir / Madam,

**REQUEST FOR SCREENING OPINION UNDER REGULATION 6 OF THE TOWN AND COUNTRY PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2017
17-27 LAYERTHORPE, YORK, YO31 7UZ**

I write on behalf of the Applicant, Danehurst Development Ltd, to request an Environmental Impact Assessment (EIA) Screening Opinion from the City of York Council in respect of a development proposed at the above Site comprising purpose-built student accommodation.

Introduction

The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 ("the Regulations") set out at Section 6(1) that a person who is minded to carry out development may request the relevant planning authority to adopt a screening opinion.

In accordance with section 6(2), the following must be provided with such a request:

- a) A plan sufficient to identify the land;
- b) a description of the development, including in particular—
 - i. a description of the physical characteristics of the development and, where relevant, of demolition works;
 - ii. a description of the location of the development, with particular regard to the environmental sensitivity of geographical areas likely to be affected;
- c) a description of the aspects of the environment likely to be significantly affected by the development;
- d) to the extent the information is available, a description of any likely significant effects of the proposed development on the environment resulting from—
 - i. the expected residues and emissions and the production of waste, where relevant; and
 - ii. the use of natural resources, in particular soil, land, water and biodiversity; and

- e) such other information or representations as the person making the request may wish to provide or make, including any features of the proposed development or any measures envisaged to avoid or prevent what might otherwise have been significant adverse effects on the environment.

In accordance with part (a), a plan to identify the land is enclosed at Appendix A (the Site). Information to satisfy the requirements of parts (b) to (e) are detailed within this letter as follows:

- Consideration of the Site and planning context;
- Overview of the proposed development;
- Consideration of the applicable regulations;
- Assessment of the scheme against the applicable regulations; and
- Provision of concluding remarks.

The Site and planning context is considered in the following section.

Site and Planning Context

The site is located on the periphery of York City Centre. Built development on site currently comprises a single-storey car show room (a sui generis use in town planning terms) with associated car parking, car repairs service and a car wash located to the rear. Vehicular access to the site is via Layerthorpe. The site in its current form is an under-utilised brownfield site in much need of redevelopment. The River Foss is situated to the rear of the site, with the open aspect of the Sainsbury's supermarket carpark beyond this.

Immediately adjacent to the site is a vacant site which used to host an Avis car service centre (South-West) which we understand was demolished in November 2022. North-East of the site is SFC takeaway store, Flames fireplace store, Hungry Horace takeaway store (which is permanently closed), DWF wood supply store, Fitness Space, Halfords Autocentre and an Asda supermarket. Further along from this is a Travelodge Hotel and a residential development under construction at the junction with Eboracum Way (LPA Ref. 19/0467/FULM).

Directly opposite (South-East) of the site is the Former Carpetwright for which planning permission was granted for the "Erection of hotel with bar / restaurant, relocation of access and associated landscaping and car park following demolition of existing buildings" under LPA Ref. 20/00940/FULM. This site has been demolished and is now in the final stages of construction. Further South-East of the site is Ultra-Flex gym, a self-storage warehouse, St Leonard's Hospice charity shop, and several car repairs services.

West of the site is the Foss Bank car park and beyond this lie a number of hotels and holiday apartments. Further West of the site and within the York City Walls lies a mix of Victorian and Edwardian terraced housing.

North of the site is the Sainsbury's supermarket and car park, which our site overlooks, and Go Outdoors camping shop. Further North of the site towards Monkgate is the Brigadier Arms Public House and a series of Listed buildings which have now been converted into guesthouses.

South of the site lies a collection of Government Offices including Natural England, Health and Safety Executive, Forestry Commission and the Department for Environment, Food and Rural Affairs.

Overall, the site is in an area of mixed character which is undergoing considerable change.

This context demonstrates that the site is located amongst a range of uses in a highly sustainable location within walking distance of several shops and amenities including:

- Asda (1 minute walk);
- Sainsbury's (3-minute walk);
- Morrisons (5-minute walk);
- Lidl (9-minute walk);
- Ultra-Flex Gym (1 minute walk); and
- The Gym (5-minute walk).

The site is within very close proximity of York St John University (8-minute walk) and is a 14-minute bus ride away from The University of York. The nearest bus stop (Layerthorpe Asda) is only a 1-minute walk away from the site and buses run every 15 minutes with a journey time to University of York's campus of 20 minutes. Furthermore, the site is a 24-minute walk from York Train Station. In accessibility terms, the site is in a strong and sustainable location for PBSA.

The site is located on Layerthorpe, a former medieval street. The site is not located within a Conservation Area. The South-western boundary of the York Central Historic Core Conservation Area (YCHCCA) is some distance away (circa 80 metres) and North-western boundary of the YCHCCA even further at circa 100 metres. As illustrated in the council's emerging interactive proposals map and the YCHCCA appraisal map, the site is nearest to the Monkgate Character Area of the Conservation Area. The Sainsbury's supermarket and car park and the River Foss sits in between the site and the Conservation Area boundary. The site is not located in any of the allocated key views identified in the YCHCCA Appraisal. The nearest Grade II Listed Building 'Foss Islands Chimney' is 0.2 mile from the site, this too is located outside of the Conservation Area.

The applicant is currently engaging in pre-application discussions with City of York Council.

Proposed Development

For the purposes of this EIA screening the proposed development comprises:

Demolition of the existing car showroom; and

Erection of a high-quality PBSA building comprising a maximum height of 23m, consisting of four storeys with a fifth floor proposed to the rear of the site adjacent to the River Foss, containing:

- 234 no. units of PBSA (116 no. cluster flats and 118 no. studios incl. 12 no accessible studios);
- Amenity space comprising gym, cinema, common room, communal kitchen, dining area, study room, gaming room and laundrette;
- 4 no. car parking spaces; and
- 142 no. cycle parking spaces.

The relevant regulations are set out in the following section.

The Regulations

EIA Screening is undertaken to consider whether or not a development constitutes 'EIA development'. EIA development is defined in the Regulations as being either:

Schedule 1 development, in which case an EIA is mandatory; or

Schedule 2 development, but only where proposals have the potential to give rise to significant effects on the environment by virtue of factors such as its nature, size or location.

Schedule 1 projects

As above, EIA is mandatory for projects listed in Schedule 1 of the EIA Regulations. Schedule 1 developments are large scale projects for which significant effects would be expected and comprise developments such as new airports and power stations. The proposed development is not of a type listed in Schedule 1.

Schedule 2 projects

To qualify as Schedule 2 development, the following thresholds set out within 10(b) urban development projects of Schedule 2 of the Regulations are relevant:

- 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 development exceeds 5 hectares.

There is no fixed definition for the term 'dwelling' within the EIA Regulations. The scheme will provide up to 234 student bedrooms. Adopting the methodology of the Housing Delivery Test Rulebook, the student bedrooms would equate to circa 94 dwellings. Furthermore, the site itself is only 0.3 hectares. If this

principle was applied, the proposed development would fail to qualify as Schedule 2 development. Nevertheless, in order to determine whether it qualifies as EIA development, an assessment as to whether the proposed development would have the potential to give rise to significant effects on the environment is necessary.

In order to assess this, the selection criteria contained in Schedule 3 should be applied. This includes:

- a. The characteristics of development, having regard to size, design, cumulative impacts, use of natural resources, production of waste, pollution, nuisance and risk of accidents and to human health;
- b. The location of development, by reference to the environmental sensitivity of the area, having regards to (amongst other things), existing use, statutory designation and landscapes of historical, cultural or architectural significance); and
- c. The types and characteristics of the potential impact (having regard to factors including the magnitude and spatial extent of the impact, the nature and probability of the impact and the possibility of effectively reducing the impact).

It is important to note that the Regulations require an EIA for qualifying development only where there are likely significant environmental impacts, and not solely where there would be likely environmental impacts that could be mitigated. Where likely impacts have been identified and potential mitigation is known to be capable of reducing such impact to less than 'significant' then such environmental considerations establish that an EIA is not required.

An assessment of the proposed development with respect to Schedule 3 is detailed below.

Screening Assessment

As noted above, schedule 3 of the Regulations sets out selection criteria which relate to specific matters including.

- a. The characteristics of development;
- b. The location of development; and
- c. The types and characteristics of the potential impact.

These criteria are addressed in the following paragraphs.

Characteristics of the Proposed Development

Size, Location and Design of Development

Built development on site currently comprises a single-storey car show room (a sui generis use in town planning terms) with associated car parking, car repairs service and a car wash located to the rear. The

site in its current form is an under-utilised brownfield site in much need of redevelopment. The proposed development comprises of:

Erection of a high-quality PBSA building comprising a maximum height of 23m, consisting of four storeys with a fifth floor proposed to the rear of the site adjacent to the River Foss, containing:

- 234 no. units of PBSA (104 no. cluster flats and 118 no. studios and 12 no. accessible studios);
- Amenity space comprising gym, cinema, common room, gaming room and laundrette;
- 4 no. car parking spaces (incl. 4 accessible spaces); and
- 142 no. cycle parking spaces.

In addition, the building frontages have been significantly set back from the south-western and north-eastern boundaries by 8.1m and 7.7m respectively to allow breathing space to the adjacent sites. In terms of public realm and landscaping, the design accommodates provision for a public riverside walkway, which the council intends to create in the future. Provision of a new access road to enable vehicular turning and exiting in forward gear will be included along with the provision of at least 3 electric vehicle charging points.

Consideration of Cumulative Impact

The following major developments have been identified within a 1km radius:

Reference	Address	Description	Decision	Date
21/01605/FULM	Mecca Bingo, 68 Fishergate	Demolition of existing buildings and redevelopment of the site to form 275no. room purpose built student accommodation with associated car parking, landscaping and facilities	Approved	25.04.2022
22/00367/FULM	Alton Cars York Ltd, 3 James Street	Demolition of existing buildings and redevelopment of the site for purpose-built student accommodation with up to 303no. bedrooms, associated communal facilities, car parking and landscaping (resubmission)	Approved	09.05.2022
21/01570/FULM	Plumbase, Waterloo House, Fawcett Street	Erection of a 3 and 3.5 storey student accommodation block (83no. student studios), ancillary storage building and landscaping following demolition of existing buildings (resubmission)	Approved	04.03.2022

19/00603/FULM	Frederick House, Fulford Road	Erection of 6no. purpose-built 4 storey student accommodation buildings (providing 368 bedrooms), associated change of use of and alterations to existing 'Guard House' building to multi-amenity use associated with the accommodation, construction of energy/plant facility, car and cycle parking, refuse/recycling storage and landscaping (re-submission of withdrawn application 18/02797/FULM)	Approved	22.05.2020
23/01647/FULM	Enterprise Rent-a-car 15 Foss Islands Road York YO31 7UL	Erection of 3, 4, and 5 storey student accommodation building with associated car parking and access following demolition of existing buildings	Approved	07.03.2024
20/01200/FULM	Aubrey House Foss Islands Road York YO31 7UP	Erection of 5 storey student accommodation building with associated car parking following demolition of existing buildings	Approved	10.03.2022
20/00940/FULM	Former Carpetright Layorthorpe York YO31 7UP	Erection of hotel with bar/restaurant, relocation of access and associated landscaping and car park following demolition of existing building	Approved	09.02.2021
19/01467/FULM	Vacant Site Eboracum Way York	Erection of 5 storey apartment building with basement comprising 62 residential units (Use Class C3), associated car parking and landscaping works	Approved	22.05.2020

These developments are typical of an urban setting. Whilst there may be some cumulative effects, e.g. noise and dust from construction, the cumulative impact of these is not likely to be significant.

EIA Checklist

In view of the above it is considered that, whilst some impact is likely, it is unlikely that the characteristics of the proposals will cause a significant adverse environmental impact.

The individual particulars that are likely to be impacted are assessed below via completion of the 'EIA Checklist' as published by the Government and utilised by the Planning Inspectorate when screening for EIA development.

The following pages contain the completed EIA checklist.

Question	Briefly explain answer and, if applicable and/or known, include name of feature and proximity to site (If answer is 'No', the answer To next column is 'N/A')	Is a significant effect likely, having regard particularly to the magnitude and spatial extent (including population size affected), nature, intensity and complexity, probability, expected onset, duration, frequency and reversibility of the impact and the possibility to effectively reduce the impact? If the finding of no significant effect is reliant on specific features or measures of the project envisaged to avoid, or prevent what might otherwise have been, significant adverse effects on the environment these should be identified in bold.	
Natural Resources			
Will construction, operation or decommissioning of the project involve actions which will cause physical changes in the topography of the area?	No	Considering the proposal's characteristics and the level terrain, it is not anticipated that there will be significant alterations in existing topography.	N/A
Will construction or operation of the project use natural resources above or below ground such as land, soil, water,	Yes	The development will result in the use of land, water, materials, and energy.	No The Site is previously developed land. Materials and the like to be used are not in short supply.

materials/minerals or energy which are non-renewable or in short supply?				
Are there any areas on/around the location which contain important, high quality or scarce resources which could be affected by the project, e.g. forestry, agriculture, water/coastal, fisheries, minerals?	No	There are no such areas within or nearby to the site	N/A	
Waste				
Will the project produce solid wastes during construction or operation or decommissioning?	Yes	The development is likely to produce waste.	No	Any impact is expected to be minor (and typical of a development of this kind). Waste disposal will involve recycling where suitable and disposal at an authorized site, ensuring no significant adverse effects.
Pollution and Nuisances				
Will the project release pollutants or any hazardous, toxic or noxious substances to air?	No	Noting the type of development proposed (residential alongside light industrial and community space), no such pollutants are to be released.	N/A	
Will the project cause noise and vibration or release of light, heat, energy or electromagnetic radiation?	Yes	Construction noise is expected. However, during the operational phase, noise levels are likely to remain low given the urban setting. They will in any case be mitigated via the development itself.	No	Construction noise would be minimal and not reach harmful levels. It would be short-term and localized. A construction management plan would effectively control this. Any potential impact would be minor and adequately managed.
Will the project lead to risks of contamination of land or	Yes	Given the Site's former use for industrial purposes,	No	A Land Contamination Assessment can be undertaken in order to ensure any risk is

water from releases of pollutants onto the ground or into surface waters, groundwater, coastal waters or the sea?		there is a potential for contamination.		evaluated and appropriately mitigated.
Are there any areas on or around the location which are already subject to pollution or environmental damage, e.g. where existing legal environmental standards are exceeded, which could be affected by the project?	No	There are no such areas around the location of the site	N/A	
Population and Human Health				
Will there be any risk of major accidents (including those caused by climate change, in accordance with scientific knowledge) during construction, operation or decommissioning?	No	None.	N/A	
Will the project present a risk to the population (having regard to population density) and their human health during construction, operation or decommissioning? (for example due to water contamination or air pollution)	Yes	While construction inherently involves some risk, it would be typical of such development and adequately controlled. The Applicant is an experienced developer committed to a high standard of construction.	No	Any impact would be typical of such development and could be adequately mitigated via Construction Management Plan.
Water Resources				
Are there any water resources including surface waters, e.g.	No	None	N/A	

<p>rivers, lakes/ponds, coastal or underground waters on or around the location which could be affected by the project, particularly in terms of their volume and flood risk?</p>				
Biodiversity				
<p>Are there any protected areas which are designated or classified for their terrestrial, avian and marine ecological value, or any non designated / non-classified areas which are important or sensitive for reasons of their terrestrial, avian and marine ecological value, located on or around the location and which could be affected by the project? (e.g. wetlands, watercourses or other water-bodies, the coastal zone, mountains, forests or woodlands, undesignated nature reserves or parks. (Where designated indicate level of designation (international, national, regional or local)).</p>	No	None.	N/A	
<p>Could any protected, important or sensitive species of flora or fauna which use areas on or</p>	No	The Site is formed entirely of hardstanding. Similarly, the area is densely urbanised, which generally	N/A	

around the site, e.g. for breeding, nesting, foraging, resting, overwintering, or migration, be affected by the project?		makes it unlikely for flora and fauna to be significantly impacted. However, any potential effects on such species could be addressed through ecological surveys conducted during the planning application stage		
Landscape and Visual				
Are there any areas or features on or around the location which are protected for their landscape and scenic value, and/or any nondesignated / non-classified areas or features of high landscape or scenic value on or around the location which could be affected by the project? Where designated indicate level of designation (international, national, regional or local).	No	None.	N/A	
Is the project in a location where it is likely to be highly visible to many people? (If so, from where, what direction, and what distance?)	Yes	The Site is in an urban and industrial environment and so is highly visible. The height proposed will also result in the development being highly visible.		Taking the visibility of the proposed development in context, its significance in relation to the EIA Regulations is likely to be minimal.
Cultural Heritage / Archaeology				
Are there any areas or features which are protected for their cultural heritage or archaeological	No	The Site itself is neither listed nor located within a Conservation Area. Whilst there are various listed buildings nearby, the	N/A	

value, or any non-designated / classified areas and/or features of cultural heritage or archaeological importance on or around the location which could be affected by the project (including potential impacts on setting, and views to, from and within)? Where designated indicate level of designation (international, national, regional or local).		proposed development will not directly impact them.		
Transport				
Are there any routes on or around the location which are used by the public for access to recreation or other facilities, which could be affected by the project?	No	None.	N/A	
Are there any transport routes on or around the location which are susceptible to congestion or which cause environmental problems, which could be affected by the project?	No	Surrounding routes are not particularly susceptible to congestion. The proposed development will be largely car-free.	N/A	A Transport Assessment and Servicing Management Plan would adequately mitigate any impact.
Land Use				
Are there existing land uses or community	No	There are no such uses or existing land which would	N/A	

facilities on or around the location which could be affected by the project? E.g. housing, densely populated areas, industry / commerce, farm/agricultural holdings, forestry, tourism, mining, quarrying, facilities relating to health, education, places of worship, leisure /sports / recreation.		be affected by the development.		
Are there any plans for future land uses on or around the location which could be affected by the project?	No	Whilst there are numerous developments occurring within 1km of the Site, the proposal would not impact these forthcoming projects	N/A	
Land Stability and Climate				
Is the location susceptible to earthquakes, subsidence, landslides, erosion, or extreme /adverse climatic conditions, e.g. temperature inversions, fogs, severe winds, which could cause the project to present environmental problems?	No	None.	N/A	
Cumulative Effects				
Could this project together with existing and/or approved development result in cumulation of impacts together during the	Yes	Given the urban and industrial setting, there are other major developments coming forward within 1km which could have cumulative impacts.	No	The developments coming forward are typical for an urban setting and it is not considered that this will result in significant cumulative impacts that cannot be mitigated.

construction/operation phase?				
Transboundary Effects				
Is the project likely to lead to transboundary effects?	No	None.	N/A	

Location of the Proposed Development

The site is located on the periphery of York City Centre. Built development on site currently comprises a single-storey car show room (a sui generis use in town planning terms) with associated car parking, car repairs service and a car wash located to the rear. Vehicular access to the site is via Layerthorpe. The site in its current form is an under-utilised brownfield site in much need of redevelopment. The River Foss is situated to the rear of the site, with the open aspect of the Sainsbury's supermarket carpark beyond this.

Immediately adjacent to vacant site which until 2022 hosted an Avis car service centre (South-West) which was demolished during the autumn 2022. North-East of the site is SFC takeaway store, Flames fireplace store, Hungry Horace takeaway store (which is permanently closed), DWF wood supply store, Fitness Space, Halfords Autocentre and an Asda supermarket. Further along from this is a Travelodge Hotel and a residential development under construction at the junction with Eboracum Way (LPA Ref. 19/0467/FULM).

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West of the site is the Foss Bank car park and beyond this lie a number of hotels and holiday apartments. Further West of the site and within the York City Walls lies a mix of Victoria and Edwardian terraced housing.

North of the site is the Sainsbury's supermarket and car park, which our site overlooks, and Go Outdoors camping shop. Further North of the site towards Monkgate is the Brigadier Arms Public House and a series of Listed buildings which have now been converted into guesthouses.

South of the site lies a collection of Government Offices including Natural England, Health and Safety Executive, Forestry Commission and the Department for Environment, Food and Rural Affairs.

Overall, it is clear that the site is in an area of mixed character which is undergoing considerable change.

This context demonstrates that the site is located amongst a range of uses in a highly sustainable location within walking distance of several shops and amenities including:

- Asda (1 minute walk);
- Sainsbury's (3-minute walk);
- Morrisons (5-minute walk);
- Lidl (9-minute walk);
- Ultra-Flex Gym (1 minute walk); and
- The Gym (5-minute walk).

The site is within very close proximity of York St John University (8-minute walk) and is a 14-minute bus ride away from The University of York. The nearest bus stop (Layerthorpe Asda) is only a 1-minute walk away from the site and buses run every 15 minutes with a journey time to University of York's campus of 20 minutes. Furthermore, the site is a 24-minute walk from York Train Station. In accessibility terms, the site is in a strong and sustainable location for PBSA.

The site is located on Layerthorpe, a former medieval street. The site is not located within a Conservation Area. The South-western boundary of the York Central Historic Core Conservation Area (YCHCCA) is some distance away (circa 80 metres) and North-western boundary of the YCHCCA even further at circa 100 metres. As illustrated in the council's emerging interactive proposals map and the YCHCCA appraisal map, the site is nearest to the Monkgate Character Area of the Conservation Area. The Sainsbury's supermarket and car park and the River Foss sits in between the site and the Conservation Area boundary. The site is not located in any of the allocated key views identified in the YCHCCA Appraisal. The nearest Grade II Listed Building 'Foss Islands Chimney' is 0.2 mile from the site, this too is located outside of the Conservation Area.

Characteristics of the Potential Impact

As explored above, the proposed development is not considered to have a significant impact on any of the criteria identified in the completed checklist. Taking this in combination with the location of the development within a highly sustainable location, it is not anticipated that the characteristics of any potential impacts are so significant so as to require an EIA. Nevertheless, relevant individual impacts are explored below.

Heritage, Townscape and Visual Impact

As aforementioned, the site is outside of the boundary of the YCHCCA and 0.2 mile away from Foss Islands Chimney which too is outside of the Conservation Area. The area in between the site and the Conservation Area consists of a large Sainsburys supermarket, car park and the River Foss. It is therefore

considered that proposed development at this site will not negatively impact or detract from the setting of the Conservation Area. As indicated above the proposed development has taken design cues from York's historic architecture and offers a red brick traditionally designed building which will sit well in the area and its historic context. The proposed development has been designed to support the character and appearance of the nearby Conservation Area in accordance with adopted and emerging heritage policies.

The Site's location on the periphery of York City Centre, away from designated heritage zones, means that the proposed development is unlikely to obstruct or alter views of significant heritage landmarks. Given the distance from protected heritage sites, the visual impact on historical streetscapes and is expected to be minimal. The development's setbacks and design features demonstrate a conscious effort to minimise visual impact and maintain compatibility with the surrounding built environment. This proactive approach has enabled the proposed building's scale, massing, and architectural style have been carefully considered to ensure it complements rather than detract from the area's heritage character. The project is currently engaged in an iterative design phase aimed at ensuring its sensitive design approach and minimal disruption to heritage assets. The development will draw on visual cues taken from the surrounding area in terms of design detail and materiality. It will also seek to enhance urban design overall within the area via improved legibility and the creation of active frontages.

The proposed development's design and scale have been carefully considered to ensure integration within the existing townscape. By incorporating setbacks and maintaining a compatible height profile with neighbouring structures, the development seeks to blend harmoniously into the urban fabric without imposing visually disruptive elements.

Ultimately, it is considered that significant effects warranting an EIA are unlikely to occur as a result of the proposal. A Heritage, Townscape and Visual Impact Assessment will be submitted to support the full planning application.

Daylight and Sunlight

The proposed development is anticipated to generate impacts concerning daylight, sunlight, overshadowing, light pollution, and solar glare conditions. As above, it is relevant to consider the context of the surrounding area and the number of tall buildings which have been approved within close proximity to the site and within a 1km radius. Most notably, the area is primarily industrial with very few residential properties in the immediate vicinity. The orientation and massing of the proposed development have been carefully optimised to minimise overshadowing of adjacent sites. By strategically positioning the building footprint and maximising setbacks, the design ensures that neighbouring land receives adequate daylight and sunlight exposure. Some daylight, sunlight and overshadowing impact is to be expected from any tall development proposal. However, it is considered that significant effects warranting an EIA will not occur as a result of the proposal. A Daylight and Sunlight Assessment to demonstrate this will be submitted to support the full planning application.

Flood risk

The site is situated within Flood Risk Zone 3, indicating a heightened vulnerability to flooding. However, with diligent design considerations and robust mitigation strategies, these risks can be effectively managed. Comprehensive technical reports submitted alongside the planning application will enable thorough assessment and the implementation of appropriate measures to mitigate flooding concerns. Conditional upon these measures, the development is poised to minimize its potential significant environmental impacts.

Landscape

The site has been in use for industrial purposes and has therefore not been designated for its ecological interest and is not covered by any statutory or non-statutory designation. A detailed Landscaping Strategy will be submitted with the full application and is expected to include various plant and tree planting including landscaped terraces. In any case, given the existing condition of the Site, the proposed development will clearly significantly improve the existing situation with regards to landscaping and green spaces.

Biodiversity

The Site does not fall within the boundaries of any statutory sites, including Special Area of Conservation (SAC), Special Protection Area (SPA), National Park, National Nature Reserve (NNR), Ramsar sites, Sites of Special Scientific Interest (SSSI) or Local Nature Reserve (LNR), nor do any of these designations lie in close proximity to the site. The site does not lie within 1 km of any statutory ecological designations.

The majority of the site comprises industrial buildings and hard standing. An ecological report and investigation will be undertaken and submitted as part of the full planning application. Should the site be used by protected species, appropriate mitigation measures will be outlined within ecological reporting and implemented as part of the development. The mixed-use development will achieve a net gain in biodiversity on Site.

Transport and Highways Impact

Throughout the demolition and construction phases, heavy goods vehicles, mobile plant machinery, and other vehicles will access the site. Management plans will mitigate the impacts of these activities. While the level of construction traffic is not expected to significantly disrupt existing traffic flows on surrounding highways, measures will be implemented to minimize potential congestion during peak periods whenever feasible. Given the site's Public Transport Accessibility Level (PTAL) of 6 and the fact that the development will be car-free, with the exception of designated blue badge parking spaces, the traffic generated by the development will primarily consist of service vehicles, pedestrians, and cyclists and thus no adverse impacts are anticipated. A Transport Statement and Travel Plan will be submitted as part of the full planning application.

Air Pollution

The anticipated traffic volume stemming from the development is not expected to yield significant impacts on air quality as suitable mitigation measures will be implemented. An air quality assessment will be submitted alongside the full planning application and mitigation measures set out in the report will be complied with to ensure minimal impact on living and business operational standards within the immediate vicinity.

Land Contamination

As the site has historically been used as an industrial site, there is potential for contamination to exist. A supporting land contamination assessment will be carried out including recommendations for any required mitigation. This will be submitted as part of the full planning application.

Noise Pollution

As the proposed development will be located within an area of a mix of uses, appropriate criteria will be proposed for environmental noise intrusion based on recommendations given within BS 8233:2014 "Sound Insulation and Noise Reduction for Buildings – Code of Practice" alongside any requirements of the Local Authority. Based on the noise survey results, a detailed external building fabric analysis and acoustic performance specifications will be produced for the various construction elements of each façade. Guidance constructions capable of meeting the performance requirements will also be met and this will form part of the full planning application.

Energy

No electromagnetic radiation, heat or energy releases are expected other than those associated with normal construction operations and activities. Sustainability measures will be incorporated into the proposal and an Energy Statement will be submitted as part of the full planning application. There will be no gas supply required to the proposed development.

Lighting

Lighting would be designed carefully in accordance with relevant standards and these details are likely to be secured by condition resultant of the grant of planning permission.

Socio-economic and Health

The proposed development includes the re-provision of light industrial floorspace and community floorspace. These will be of a high-quality to suit modern occupiers.

Cumulative Impacts

Other major development that is coming forward, or proposed to come forward, within 1km of the Site is detailed earlier in this letter. The developments are typical of such an urban setting and it is not considered that any cumulative impacts would be significant nor that they could not be mitigated appropriately.

Summary

Given the nature of the proposed development it is considered that it would not have any unusually complex or potentially hazardous effects on the environment and would not result in any potential significant effects of development in relation to Schedule 3 of the regulations.

In support of this, and having reviewed the local validation checklist, the following technical reports and assessments will be submitted with the forthcoming full planning application:

- Cover Letter
- Planning Application Form
- Existing and Proposed Architectural Drawings
- Location Plan
- Streetscene context elevations
- Planning Statement
- Design and Access Statement
- Assessment regarding accessible rooms
- Transport Statement
- Travel Plan
- Traffic Management Plan
- Parking details including cycle storage
- Access details
- Flood Risk Assessment
- Drainage Strategy
- Land Contamination Assessment
- Heritage Statement
- Preliminary Ecological Assessment
- Archaeological Assessment
- Noise Assessment
- Sustainability and Energy Statement
- Tree Survey
- Sunlight and Daylight Assessment
- Student Management Plan
- Landscape scheme

- Lighting scheme and assessment
- Construction Environmental Management Plan (CEMP)
- Waste Management Plan

A public consultation event will be held prior to submission of the application. A Method of Works Statement and/or Construction Traffic Management Plan was listed in the pre-application feedback as a required document, however this will sought to be conditioned following approval.

Conclusion

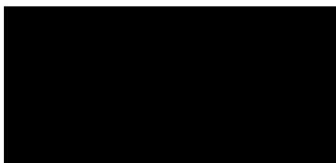
The proposed development at the Site has been assessed under the EIA Regulations, taking account of the location and characteristics of the development and any potential significance for cumulative impacts. Following consideration of the proposed development at the site, within the context of the Regulations, it is deemed that the proposed development will not give rise to significant environmental effects both individually or cumulatively. This is largely due to the fact that:

1. The proposed development is not listed as a Schedule 1 project;
2. The proposed development is not located in a 'sensitive area' as defined by the Regulations;
3. The Site constitutes previously developed land, in accordance with the definition contained in Annex 2 of the NPPF; and
4. Following assessment, the proposed development is not considered to have significant effects on the environment for the purposes of the EIA regulations.

Consequently, it is concluded that an Environmental Impact Assessment is not required. Section 6 (6) of the Regulations states that the Council shall have a screening opinion within 21 days of the date of receipt of a request and we look forward to receiving a response within this time frame.

If, in the interim, you have any queries please do not hesitate to contact either Aidan Payne (aidan.payne@rokplanning.co.uk) or myself.

Yours faithfully,



Matthew Roe
Director
ROK Planning Ltd

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