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Dear Mr Pearson

FORMER B&Q SITE, GREAT STONE ROAD, STRETFORD

REQUEST FOR SCREENING OPINION – TOWN AND COUNTRY PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2017

Further to recent discussions, I write to you on behalf of Accrue (Forum) 1 LLP regarding a forthcoming planning application for up to 450 residential apartments (up to 13 storeys in height) at the former B&Q site, Great Stone Road, Stretford.

This letter addresses the requirements of the Town and Country Planning Environmental Impact Assessment (EIA) Regulations 2017. It has also been written having regard to Planning Practice Guidance.

Accompanying this letter is a draft proposed site plan identifying the site, and proposed elevations. For the reasons set out below this development does not comprise Environmental Impact Assessment (EIA) development. Therefore, the preparation of an Environmental Statement will not be required.

Background

The site has been occupied by the former B&Q store from the late 1970's. There have been various planning applications relating to the B&Q store over the years. The most recent application is the prior approval for demolition of all buildings on site, which was granted on 8 June 2017.

The site

The site measures approximately 1ha and is located and accessed off Great Stone Road. At present the site is occupied by a vacant retail store, previously trading (until late 2015 / early 2016) as B&Q.

The site is located in the Old Trafford part of Stretford, within a built-up part of the Greater Manchester conurbation. There are strong public transport links nearby including bus stops and the Old Trafford Metrolink stop.



The area surrounding the site is predominantly occupied by Old Trafford Cricket Ground, housing, multi-storey office blocks and a surface car park. The tramline runs adjacent to the site's southern boundary.

Proposal

This outline planning application is for up to 450 residential apartments (up to 13 storeys, ie ground level and 12 storeys above) at the former B&Q site, Great Stone Road, Stretford.

The proposal will include commercial units on a new ground floor, with potential uses including convenience retail, coffee shop, gym, common room, meeting rooms, and concierge. The development will be set around two landscaped courtyards and will create new public realm to the front and side of the development.

The site will continue to be accessed from Great Stone Road. As Great Stone Road rises in height to cross over the tramline, there is a notable change in levels close to the road. This enables parking to be provided beneath the new ground level podium.

Screening

There are two schedules under the Regulations which, if a development falls into, EIA screening is required. Schedule 1 development is specifically defined; the proposal does not fall within any of the categories set out in Schedule 1.

EIA development is also defined as any Schedule 2 development likely to have significant effects on the environment by virtue of factors such as its nature, size or location. Schedule 2 development is development listed in Schedule 2 where:

- Any part of a development is to be carried out in a sensitive area; or
- Any applicable threshold or criterion in the corresponding part of Column 2 of that table is exceeded or met in relation to that development.

Schedule 2 of the Regulations details development types where an EIA could be required, subject to certain thresholds being exceeded and subsequent screening against Schedule 3 of the regulations. The category within which this project falls is 10(b) which states:

- Infrastructure Projects

(b) Urban development projects, including construction of shopping centres and car parks, sports stadium, leisure centres and multiplex cinemas;

The thresholds and criteria for Infrastructure projects are as follows:

(i) The development includes more than 1 hectare of urban development which is not dwellinghouse development; or



- (ii) The development includes more than 150 dwellings; or
- (iii) The overall area of the development exceeds 5 hectares.

The proposal falls within Column 2 of Schedule 2 which requires residential development projects of more than 150 dwellings to be screened for EIA.

Schedule 2 sets out the description of development and applicable thresholds and criteria for the purpose of the definition of “Schedule 2 Development”. The thresholds covered in the schedule are indicative and each proposal is subject to its own assessment. In making this assessment LPA’s must take into account the relevant ‘Selection Criteria’ which is identified in Schedule 3 of the Regulations.

This identifies three broad criteria which should be considered;

- The characteristics of the development (size, use of natural resources, quantities of waste and pollution generated and risk of accidents);
- The environmental sensitivity of the location; and
- The characteristics of the potential impact (extent, magnitude, probability, duration and frequency).

Meanwhile, PPG provides indicative screening thresholds, suggesting that EIA “is unlikely to be required for the redevelopment of land unless the new development is on a significantly greater scale than the previous use, or the types of impact are *of a markedly different nature or there is a high level of contamination.*” It notes the key issues to consider are the physical scale of development, along with potential increases in traffic, emissions and noise.

In the table below we assess the proposal against the three broad criteria and conclude that the proposed development would not have a significant environmental impact on the local area.

Characteristics of development

Criteria	Appraisal of the Scheme
Characteristics of development	
(a) The size and design of the whole development;	The application site comprises approximately 1 ha. The proposal is for up to 450 residential units (up to 13 storeys in height) alongside ground floor commercial space, car parking and landscaping.
(b) Cumulation with other existing development and / or	We have identified five planning permissions / prior approvals dating from the past five years within 500m of



approved development;	the site. These provide a total of 359 dwellings.
(c) The use of natural resources, in particular land, soil, water and biodiversity;	The proposed development will not involve any significant or unusual use of natural resources and will not result in the use of natural resources that are considered to be in short supply.
(d) Production of waste;	The production of waste associated with the proposed residential units will be typical of a residential development of this scale.
(e) Pollution and nuisances;	<p>The proposed development would not generate a significant level of environmental pollution and noise. An Air Quality Assessment has been carried out by REC Ltd which confirms the location is suitable for residential use without the inclusion of mitigation methods to protect future users from poor air quality.</p> <p>During construction of the proposed development, there is potential for air quality impacts as a result of fugitive dust emissions from the site. Good practice dust control measures will be implemented to minimise any temporary impacts generated by demolition, earthworks and construction and trackout activities.</p> <p>The development will be subject to a planning condition requiring the production of a Construction Management Plan that would help minimise the temporary construction impacts.</p> <p>In summary, there is no likelihood of significant pollution or nuisance effects arising from the development (and in accordance with the criteria listed in the PPG).</p>
(f) The risk of major accidents and / or disasters relevant to	The proposed use is for residential-led mixed use development. There is no

the development concerned, including those caused by climate changes, in accordance with scientific knowledge;	increased risk of major accidents and or disasters as a result of this development; as such this does not trigger the need for EIA.
(g) The risks to human health (for example, due to water contamination or air pollution).	The proposal is for C3 residential use; initial assessment shows there will be no significant risks human health, including from air pollution.

Location of development

Criteria	Appraisal of the Scheme
Location of development	
The environmental sensitivity of geographical areas likely to be affected by development must be considered with particular regard to;	
a) The existing and approved land use;	The existing site is occupied by a vacant retail store (Use Class A1), previously trading as B&Q, until late 2015.
b) The relative abundance, availability, quality and regenerative capacity of natural resources in the area and its underground;	There are very few natural resources on site, being brownfield with few trees and shrubs. Physical changes to the site's topography will be limited to provision of undercroft parking at the current ground level, with a podium spanning across it to the existing level of Great Stone Road as it rises to cross the tramline.
c) The absorption capacity of the natural environment, paying particular attention to the following areas; Wetlands, riparian areas, river mouths;	The majority of the site comprises buildings and hardstanding with some vegetation, grassland, hedgerow and scattered scrub and trees. There are no designated sites within 1km of the site and the site falls outside of any SSSI impact risk zone. The works on site are minimal, involving building

<p>Coastal zones and the marine environment;</p> <p>Mountain and forest areas;</p> <p>European sites and other areas classified or protected under national legislation;</p> <p>Areas in which there has been a failure to meet the environmental quality standards, laid down in Union legislation and relevant to the project, or in which it is considered that there is such a failure;</p> <p>Densely populated areas;</p> <p>Landscapes and sites of historical cultural or archaeological significance.</p>	<p>demolition and subsequent residential development.</p> <p>There would be no impact upon absorption capacity on the natural environment.</p> <p>The site is within a built-up area that includes a mix of different types of housing, along with commercial, employment and leisure uses. However the population density of the surrounding area is not sufficient to be significantly sensitive to additional development.</p> <p>The site is located within the vicinity of the Greater Manchester Combined Authority Air Quality Management Area (AQMA). However, the air quality assessment carried out by REC confirms that good practice control measures would provide suitable mitigation during construction of this development and reduce potential impacts to an acceptable level. Moreover the proposed development will include measures to encourage the use of sustainable travel rather than the private car.</p> <p>The site is not located in any historical, cultural or archaeological area of significance.</p>
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Types and characteristics of the potential impact

Criteria	Appraisal of the Scheme
<p>Characteristics of Potential Impact</p> <p>The likely significant effects of the development on the environment must be considered in relation to criteria set out in paragraphs 1 and 2 above, with regard to the impact of the development on the factors specified in regulation 4(2), taking into account</p>	
<p>a) The magnitude and spatial extent of the impact (for example geographical area and size of the population</p>	<p>These effects are considered in detail below.</p>



likely to be affected);	
b) The nature of the impact;	
c) The transboundary nature of the impact;	
d) The intensity and complexity of the impact;	
e) The probability of the impact;	
f) The expected onset, duration, frequency and reversibility of the impact;	
g) The cumulation of the impact with the impact of other existing and/or approved development.	
h) The possibility of effectively reducing the impact.	

Potential Impacts

The following impacts have been considered and will be addressed in the planning application where necessary. The proposal is unlikely to have significant environmental effects.

Landscape, townscape and visual impacts

TPM Landscape Architects is preparing a TVIA to accompany the planning application.

The proposed development will introduce a replacement building to a brownfield site. The proposal is taller than the existing building, but for context, at 12-storeys in height it will top-out at 66.30m AOD, compared with 80.79 AOD for the height of the cricket ground's floodlights.

The development will be viewed within an existing urban townscape, with initial TVIA work showing its likely visibility will tend to be confined to locations within a 1km radius (subject to intervening vegetation and buildings).

There are no designated townscapes or landscapes within this context, and the



urban location is generally of lower sensitivity. The potential cumulative effects with approved or existing schemes reduces the likelihood of significant effects, because these other developments also contribute to the urban setting and will add vertical elements to the skyline.

Although visual impacts of the proposal will be permanent, they will be straightforward to assess in the TVIA and will be confined to a localised area.

Air Quality

REC Ltd are preparing an air quality assessment to accompany the planning application. The work finds that once operational, effects will not be significant.

There is potential for significant effects arising through construction, however the development can include standard mitigation measures to reduce and avoid these temporary effects.

Mitigation

Potential construction phase air quality impacts from fugitive dust emissions were assessed as a result of demolition, earthworks, construction and trackout activities. Good use of control measures would provide suitable mitigation and reduce potential impacts to an acceptable level.

Dispersal modelling was also undertaken to assess impacts as a result of road vehicle exhaust emissions associated with traffic generated by the development. The dispersion modelling indicated that pollutant levels across the site were below the relevant air quality standards.

Ecology and trees

TEP have undertaken an ecological assessment that confirms the site is of minimal ecological value. The limited habitats on site are of no ecological value and comprise predominantly, hardstanding and a large building. The development will not impact on any priority habitats, nor protected or invasive plant species.

The existing building on site was found to still have negligible potential for bats and the trees on site have negligible potential for bats; no further bat surveys are required. There are no other implications for any other protected species on the site.

The surrounding area is not sensitive to the development.

Noise

Holtz Acoustics have carried out an initial noise and vibration assessment to determine the noise levels the site is currently subjected to.

The predominant noise source affecting the site is road traffic noise along Great Stone Road. Results of the noise surveys confirm the site falls into a Low to



Medium noise risk. Internal noise level recommendations can be met.

A vibration survey has been undertaken to measure vibration associated with the tramline on the south-eastern boundary of the site. Measures and calculation shows the Vibration Dose Values (VDVs) are significantly below the 'Low Probability of Adverse Comment' levels, and there are no issues of noise which would be unacceptable.

There is a risk of noise from events at the cricket ground, particularly concerts. These effects will be infrequent (a limited number of such events are permitted annually, subject to various conditions and limitations), predictable and localised. Therefore the environmental effects are not likely to be significant.

Flooding and drainage

Waterco Consultants have undertaken a flood risk assessment and drainage strategy which confirms the site is located within Flood Zone 1 (less than 0.1% annual probability of flooding). The site is at very low risk of flooding from all sources and therefore site-specific mitigation measures are not necessary.

Preliminary drainage assessment work reveals that the existing utilities services can withstand the new development.

Conservation and heritage

The site is not a heritage asset. There are a few designated heritage assets within 1 km of the site, such as Trafford Town Hall and the White City gates, but the impact on their settings will not be significant (a Heritage Statement in conjunction with the TVIA will demonstrate the impact).

Traffic

Vectos will prepare a Transport Assessment to support the application for the Proposed Development.

Most environmental issues relating to traffic only become perceptible when there is a significant increase in traffic. The Institute of Environmental Assessment (IEA) document "Guidelines for the Environmental Assessment of Road Traffic" (1993) states that the following criteria should be adopted to determine the need for environmental assessment of traffic impacts associated with development:

- Include highway links where traffic flows will increase by more than 30% (or the number of heavy goods vehicles will increase by more than 30%).
- Include any other specifically sensitive areas where traffic flows have increased by 10% or more.

Increases in flows of less than 10% have negligible impact as daily variance in traffic flows can be of equal magnitude.

The 30% threshold relates to the level at which humans may perceive change and



there may therefore be an effect. It is important to note that impacts above this level do not suggest that there is a significant impact, only that further consideration is required.

Using this guidance as a framework, forecasting the number of traffic movements in the baseline situation and in the development operational phase is the critical process in establishing the magnitude of the potential impact and its significance.

The site has been used in the recent past as a DIY superstore (A1 retail), which generated vehicle trips throughout the week. By reference to the TRICS trip rate database, a DIY superstore of the size that operated on the site could be expected to generate 1,838 two-way vehicle movements during the course of a typical busy day, including HGV deliveries and trade pickups in large vans.

The proposed residential development is forecast to generate 1,594 two-way trips during the course of a typical peak day. This is 244 fewer trips than the A1 retail use, and therefore the proposed development is unlikely to result in an increase in the average daily traffic flows above that generated by the A1 retail use at the site, and certainly less than a 30% increase in traffic along any single link.

Notwithstanding, the operation of the Great Stone Road / Talbot Road signalised junction has been considered in more detail for the weekday morning and evening peak periods, with a traffic count survey undertaken in November 2017. Whilst there is some peak hour congestion at this junction, the forecast peak period trips generated by the Proposed Development are not of a level to materially change the operation of the junction.

On-site observations have been undertaken to establish any particularly sensitive locations, and whilst there are some residential properties along the south-western side of Great Stone Road, given the small changes in traffic flows described, the impact for these residents would be negligible.

A Travel Plan will also be adopted by the development, which will provide a mechanism to promote and support residents travel by sustainable means rather than using the private car.

On this basis it is concluded that the proposed development will have a negligible impact upon driver delay, delay to bus users, pedestrian delay and amenity, pedestrian and cyclists fear and intimidation, severance or road safety, and there are therefore unlikely to be significant environmental effects in this regard.

Microclimate

The development proposal has been prepared in close conjunction with assessment of shadowing and assessment of effect on wind conditions. There are predicted to be some changes to the wind conditions on site, but these can be mitigated through landscaping. Effects off-site will be minor.

Shadowing effects will also be predictable and localised, and are not likely to be significant. Solar analysis shows that during the summer months, the shadow cast



by the proposal will not extend onto the cricket ground any further than the shadows cast by existing built form (ie the stands). Solar analysis also shows that at the most sensitive part of the year (summer evenings), only a few residential properties will be in shade compared with a scenario with no development on the site.

Summary

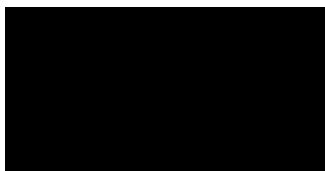
The planning application is for up to 450 residential apartments (up to 13 storeys) at the former B&Q site, Great Stone Road, Stretford.

The development is unlikely to result in significant environmental effects and EIA should not be required to support this planning application.

We look forward to receipt of your Screening Opinion within 21 days of this notice, as required by the Town and Country Planning (Environmental Impact Assessment) Regulations 2017.

We trust the above is acceptable but should you have any queries or require any further information please do not hesitate to contact me.

Yours sincerely



Matthew Hard

Enc: As above

cc: Mr G Pearson-Gregory