

Planing Statement - Appendix 1

Pall Mall Liverpool

Request for Screening Opinion

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June 2019

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Appendices

Appendix 1

Plan identifying the site

Appendix 2

Verified views (separate document)

Appendix 3

Wind microclimate assessment (separate document)

1. Executive summary

- 1.1. This is a request for a screening opinion submitted to Liverpool City Council, on behalf of Kier Property. It is submitted under the Town and Country Planning (Environmental Impact Assessment) Regulations 2017, and includes the information required under those regulations.
- 1.2. A mixed-use development is proposed on c1.2 ha of brownfield land between Bixteth Street and Pall Mall, within Liverpool city centre. The site is currently being cleared and remediated following a previous planning permission.
- 1.3. A forthcoming hybrid planning application will propose five new buildings and associated new public realm. One building and the majority of the public spaces will be proposed in detail, with the remaining buildings and some open space proposed in outline.
- 1.4. The proposed GIA of the five buildings will be around 57,000 sqm.
- 1.5. Following initial consideration of the potential for environmental effects arising from the proposed development, including in cumulation with approved and existing development, some positive effects on the local economy, local air quality and local human health have been identified.
- 1.6. There is potential for some negative effects on local residential amenity through changes to daylight and sunlight, and there is the potential for some changes to the setting of heritage assets. These are not likely to be significant environmental effects.
- 1.7. There is also potential for some negative effects on the local environment and population during construction.
- 1.8. With mitigation in the form of design codes and a construction management plan, it is not likely that the proposal will have significant environmental effects, and it is concluded that the proposed development should not be subject to environmental impact assessment.

2. Introduction

- 2.1. WSP | Indigo Planning has prepared this request for a screening opinion on behalf of Kier Property. The request is issued to Liverpool City Council as local planning authority (the LPA).
- 2.2. The report is a formal request for a screening opinion, under the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (the Regulations). It has been prepared having regard to the Regulations and to Planning Practice Guidance (PPG).
- 2.3. Regulation 6 requires a person making a request for a screening opinion to provide the following:
- a plan identifying the site (Appendix 1)
 - 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
 - a description of the aspects of the environment likely to be significantly affected by the development
 - to the extent the information is available, a description of any likely 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;
 - 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.
- 2.4. The description of the development is provided in Section 3.
- 2.5. The description of the location, the surrounding area and surrounding environment is provided in Section 2.
- 2.6. Likely effects are provided in Section 4.
- 2.7. In accordance with Regulation 6(4) regard is had to the criteria in Schedule 3 of the Regulations throughout.
- 2.8. In line with Regulation 6(4) regard is also had to other relevant EIAs that have been undertaken.

3. Background

Site location

- 3.1. The subject site constitutes brownfield land within Liverpool city centre. **Appendix 1** provides a site location plan. The site is located to the rear of Exchange Station, a former railway station that has been extended and converted to primarily office uses. The site is bound to the south-west by Bixteth Street and to the north-east by Pall Mall. Surface car parks lie to the north-west of the site.
- 3.2. The site is around 1.2 ha in size, extending around 115m from north-west to south-east, and around 125m from north-east to south-west.

Land use

- 3.3. The site is currently being cleared, levelled and remediated, pursuant to planning permission 18F/2614. The previous use of the site was a surface car park (with around 200 spaces) and an area of open space, comprising soft and hard landscaped areas.
- 3.4. Two railway tunnels run beneath the site at a depth of around 15m. These are in use by Merseyrail and Network Rail services.
- 3.5. The site was once occupied by the tracks, platforms and sheds of Exchange Railway Station.

Surrounding area and environment

- 3.6. A mix of land uses surround the site, including residential apartments to the west and on the eastern side of Pall Mall, office buildings to the south-east and on the opposite side of Bixteth Street, and surface car parks to the north-west.
- 3.7. The front elevation of the former Exchange Station remains *in situ* to the south of the site, having been converted to offices and extended in the 1980s. The former station's principal elevation was to the south to Tithebarn Street. To the south of Tithebarn Street is Moorfields underground station, whilst the primary retail area of Liverpool city centre is located further south.
- 3.8. Pall Mall forms part of the Liverpool Central Business District; further west and north-west is a cluster of office buildings on Old Hall Street and St Paul's Square. In and beyond this office area are some of Liverpool's tallest buildings, with the Leeds Street and Old Hall Street areas being the location of some proposed (and committed) apartment schemes in the past five years.
- 3.9. Westmorland Drive is a residential area located at its closest around 80m to the north-east.
- 3.10. The site is located in Flood Zone 1.

Surrounding environment

- 3.11. The service yard for Exchange Station is located within the Castle Street Conservation Area, the boundary of which abuts the rear of Exchange Station. A small part of the site falls within the Conservation Area.
- 3.12. An initial heritage assessment by Hinchliffe Heritage shows eight listed buildings within the immediate vicinity of the site:

- 59-61 Tithebarn Street (Grade II);
 - 67 Lion Tavern, Moorfields (Grade II);
 - 35 Windsor Building, George Street (Grade II);
 - The Albany, Old Hall Street (Grade II*);
 - 33 Berey's Buildings, George Street (Grade II);
 - 12 Lombard Chambers, Ormond Street (Grade II);
 - Cotton Exchange, Old Hall Street (Grade II); and
 - Orleans House, Edmund Street (Grade II*).
- 3.13. There are many more listed buildings located in Liverpool city centre, but the above are those that are most sensitive to impact from the development proposal.
- 3.14. The site is within the World Heritage Site buffer zone. The site abuts the boundary of the World Heritage Site to the south-west and the south-east.
- 3.15. The Mersey estuary lies around 600m to the west.

Site history

- 3.16. The majority of the site was first developed in the first quarter of the 19th century, comprising houses and warehouses.
- 3.17. The first Exchange Station opened in 1850. Tracks were raised above street level, with stairs and ramps leading up to the higher level. An underpass was provided that linked Pall Mall with Bixteth Street. The station acted as a terminus to lines from Preston, Bolton and Crosby and Southport.
- 3.18. The station was rebuilt to increase capacity, reopening in phases in 1886 and 1888. The station and a hotel were positioned further forward on Tithebarn Street, at street level. The station included four train-shed roofs enclosing 10 platforms. The use of the station declined post-1945 and the station closed in 1977.
- 3.19. In 1985 part of the station was retained and a large part demolished, with a new extension providing office development, with landscaped open space immediately to the rear, and surface car parking beyond.

Planning history

- 3.20. Planning permission 05O/2289 was granted in 2005 but since lapsed. This approved a mixed-use development comprising offices, retail and restaurant uses, 322 residential properties, car parking and various landscaping and engineering works. This application was accompanied by an Environmental Statement, which would have been prepared under previous iterations of the Regulations, policy and guidance.
- 3.21. Planning permission 18F/2614 was granted in 2019:

To carry out reclamation works to prepare the site for future proposed commercial development; works to include ground remediation, constraint removal, existing service and drainage removal / diversion, demolition and relocation of substation, demolish Pall Mall retaining wall to create vehicle access onto Pall Mall.

Cumulative effects

- 3.22. The following permissions have been identified as being major developments in the vicinity of the site that could result in cumulation of effects with the proposed development.

| Address | Application reference | Proposal | Comments |
|------------------|-----------------------|--|--|
| 30-36 Pall Mall | 16F/2634 | To demolish existing buildings and structures, erect a part 10 (9+ ground), part 22 storey (21+ ground) residential development comprising 336 apartments (C3 Use) with associated communal facilities, two ground floor commercial units (A1/A2/A3/A4/D1 Use Class) and associated access, servicing, parking and landscaping. | Not accompanied by an ES. Potential for cumulative effects associated with scale, massing and design, including wind microclimate, daylight and sunlight, townscape and heritage. |
| Liverpool Waters | 10O/2424 | 60ha of mixed-use development | Accompanied by an ES. Potential for cumulative effects associated with scale, massing and design, including wind microclimate, townscape and heritage. Potential for cumulative positive effects on socio-economic issues. |
| Princes Reach | 16F/1370 | To erect a 34 storey residential tower (Use Class C3) comprising 304 private rented sector apartments and 40 car parking spaces, 76 cycle parking spaces together with plant, storage, reception, residential amenity areas, hard and soft landscaping and associated works on currently vacant land at William Jessop Way, Princes Dock, Liverpool 3. | Accompanied by an ES. Potential for cumulative effects associated with scale, massing and design, including wind microclimate, townscape and heritage. |
| Infinity | 17F/0340 | To demolish existing buildings and construct three towers (39, 33 and 27 storeys) together with a two storey podium and basement, comprising 1,002 no. residential units (Units Class C3), together with commercial/retail uses (Use Classes A1, A2 or A3), offices (Use Class B1), residents facilities (lounge, meeting space, cinema room, fitness gym and swimming pool), car and cycle parking and associated access and landscaping. | Accompanied by an ES. Potential for cumulative effects associated with scale, massing and design, including wind microclimate, townscape and heritage. |
| Ovatus I | 17F/0042 | To erect 27 storey residential development plus basement levels, comprising 168 dwellings, | Not accompanied by an ES. |

| | | | |
|------------|----------|---|---|
| | | plus associated public realm, landscaping and engineering works. | Potential for cumulative effects associated with scale, massing and design, including wind microclimate, townscape and heritage. |
| The Hive | 17F/0456 | To erect 31 storey residential tower (Use Class C3) comprising 278 private rented sector apartments and 27 car parking spaces (2 disabled), 3 motorcycle bays, 90 cycle parking spaces in addition to a ground and top floor restaurant/cafe (Use Class A3) together with plant, storage, reception, residential amenity areas and hard and soft landscaping. | Accompanied by an ES. Potential for cumulative effects associated with scale, massing and design, including wind microclimate, townscape and heritage. |
| Plaza 1821 | 17F/0913 | To erect 15 storey residential tower comprising 105 apartments (C3 Use) and two ground floor commercial units (A1/A3/A4 Use) with 26 external car parking spaces and landscaping works. | Accompanied by an ES. Potential for cumulative effects associated with scale, massing and design, including wind microclimate, townscape and heritage. |

4. The proposal

- 4.1. The planning application will be submitted as a 'hybrid'; full permission will be sought for a new office building (comprising basement, ground and mezzanine, with six storeys above, plus plant on the roof) comprising approximately 16,500 sqm of new floorspace (gross external area). This building will include office space above a ground floor on which flexible uses are proposed (within use classes A1, A2, A3, A4 and B1). The building will also include a basement, with car parking (around 25 spaces), cycle storage and showers, along with plant.
- 4.2. Full permission will also be sought for new public realm, including hard and soft landscaping, rights of way and highway.
- 4.3. The outline element of the hybrid application will include four further building plots: one for a hotel (use class C1), two for offices (use class B1) and one for a pavilion building within the open space. Flexible uses are proposed for the ground floors of the three main buildings and for the pavilion. The outline element will include means of access, with all other matters reserved.
- 4.4. A new substation will be provided in the north of the site adjacent to Plot D; this has planning permission under reference 18F/2614 and will replace the existing substation located on Bixteth Street.
- 4.5. The parameters for the proposal are:

| Building plot | Maximum height (ground to roof) | Maximum plot size | Comments |
|---|------------------------------------|-------------------|--------------------------------------|
| A – B1 office with A1, A2, A3, A4 or B1 at ground-floor | 45m | 25m x 25m | Subject to full planning application |
| B – C2 hotel | 55m | 20m x 30m | Subject to outline application |
| C – B1 office with A1, A2, A3, A4 or B1 at ground-floor | 60m | 20m x 30m | Subject to outline application |
| D – B1 office with A1, A2, A3, A4 or B1 at ground-floor | 50m | 20m x 30m | Subject to outline application |
| E – A1, A3, A4, D1 | 10m | 8m x 8m | Subject to outline application |

- 4.6. The plan in **Appendix 1** identifies these building plots. For the avoidance of doubt, the landscaping and public realm is not shown on this plan, which is only required for the purposes of identifying the site.
- 4.7. There will be vehicular access to the site from Bixteth Street and from Pall Mall. Although these access points will be connected, access across the site will be strictly controlled for emergency vehicles and servicing, with priority given to pedestrians.
- 4.8. There will be three additional access points for pedestrians: one in the southern corner, one in the south-east that will be included as part of the hotel development and a future connection to the potential future developments to the north-west.

Demolition

- 4.9. The demolition of a small disused building adjacent to Pall Mall is required as part of the development.

Construction

- 4.10. There will be some further ground works as part of the development, to create building plots, the public realm and for foundations and basements.
- 4.11. There will be no hazardous waste or substances used in the construction.
- 4.12. Construction waste will be handled in accordance with best practice and is likely to be controlled via a planning condition and Construction Management Plan.
- 4.13. The use of natural resources will be typical for city centre development.
- 4.14. The total construction process is expected to last until around 2026, albeit this will be phased and not necessarily continuous.

Operation

- 4.15. The first phase (office block and public realm) is expected to be ready by late 2021 / early 2022.
- 4.16. The buildings will be designed to achieve a minimum of BREEAM excellent.
- 4.17. Drainage will be sustainable, with a strategy for both surface water and foul to accompany the planning application, confirming appropriate discharge to the local networks.
- 4.18. Waste associated with the development will be typical of this kind of city centre mixed-use. A waste management plan will accompany the application.
- 4.19. The development will not produce any hazardous, toxic or noxious substances or pollutants.
- 4.20. The development will not generate pollutants or contaminants that could affect ground or water resources.

5. Screening

- 5.1. 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 is not Schedule 1 development.
- 5.2. 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.
- 5.3. 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 this project falls is 10(b), which states:
 - Infrastructure projects
 - (b) urban development projects, including construction of shopping centres and car parks, sports stadiums, leisure centres and multiplex cinemas;
- 5.4. The thresholds and criteria for infrastructure projects are as follows:
 - The development includes more than one hectare of urban development which is not dwellinghouse development; or
 - The development includes more than 150 dwellings; or
 - The overall area of the development exceeds five hectares.
- 5.5. The total development will comprise up to 60,000 sqm of new gross internal floorspace and is situated on an area of around 1.2 ha.
- 5.6. 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 are indicative and each proposal is subject to its own assessment. In making this assessment, local planning authorities must take into account the relevant ‘Selection Criteria’ which are provided in Schedule 3 of the Regulations.
- 5.7. 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;
 - The characteristics of the potential impact (extent, magnitude, probability and frequency).
- 5.8. 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*” (Indigo emphasis). It notes the key issues to

consider are the physical scale of development, along with potential increases in traffic, emissions and noise.

Characteristics of development

- 5.9. This sub-section follows the list of matters provided in Schedule 3 of the Regulations.

The size and design of the whole development

- 5.10. The development comprises five new buildings and public realm; three buildings will primarily be used as offices, one as a hotel and the smaller building as a pavilion-style building in the public space. The four larger buildings will be in the region of 45 – 60m in height. The tallest building will be notably shorter in height than the approved development at 30-36 Pall Mall as well as several other buildings in the Central Business District.
- 5.11. A total floorspace of up to 60,000 sqm is proposed.
- 5.12. The design will be controlled via a design code, with buildings traditional in mass and form.

Cumulation with other existing development and/or approved development

- 5.13. There is potential for cumulation of effects with other developments, associated with the developments' scale, massing and design. These potential effects can be summarised as townscape and visual, heritage, daylight and sunlight, and wind microclimate. There is also potential for positive cumulative effects with the approved Liverpool Waters scheme in terms of socio-economic benefits.

The use of natural resources, in particular land, soil, water and biodiversity

- 5.14. The site is entirely previously-developed, with no particular land, soil, water or biodiversity interest. The use of water within the development's operation will be typical of city centre office and commercial developments.

The production of waste

- 5.15. Whilst waste is inevitable, it will be subject to the waste hierarchy, including during demolition, construction and operation.

Pollution and nuisance

- 5.16. The potential for pollution directly from the proposal is minimal.
- 5.17. The potential for nuisance is minimal. Uses within A3 or A4 would be subject to restrictions on amplified music to avoid any noise disruption to offices or to residential properties. Given the city centre location, such effects would not in any case be significant.
- 5.18. The site is currently being remediated, so the ground conditions will be made suitable for the development to be proposed.

The risk of major accidents and / or disasters relevant to the development concerned, including those caused by climate change, in accordance with scientific knowledge

- 5.19. The risk of major accidents or disasters is minimal.

The risks to human health (for example, due to water contamination or air pollution)

- 5.20. Risks to human health from water contamination is low, because no water resources will be affected.

- 5.21. Risks to human health from air pollution is low, because the proposal will have limited car parking compared with the historic use of the site as a car park, thus resulting in a reduction in vehicular movements. The construction stage will be subject to a Construction Management Plan to be controlled via planning condition.
- 5.22. The site is currently being remediated and will be presented as a cleaned site ahead of any the proposed development taking place.

Location of development

- 5.23. This sub-section also includes matters listed in Schedule 3 of the Regulations.

Existing and approved land use

- 5.24. The previous land use was car parking and open space. There is no existing or approved land use due to the ongoing remediation of the site.

The relative abundance, availability, quality and regenerative capacity of natural resources in the area and its underground

- 5.25. Natural resources in the area and its underground will be unaffected by the development.

The absorption capacity of the natural environment, paying particular attention to the following areas (bolded in the text below)

- 5.26. There are no **wetlands** or **riparian areas** close to the site.
- 5.27. The Mersey estuary is located around 600m to the west of the site. It is a sensitive **river mouth**, subject to various international designations. As there is intervening built form, including much of Liverpool's CBD, the Mersey estuary is unlikely to be affected by the proposed development, and there will be no connecting corridors or environments linking the sensitive estuary with the site.
- 5.28. The development will not have a direct effect on the **coastal zone** or the **marine environment**; indirect effects are unlikely because they will be very localised.
- 5.29. There are no **mountain** or **forest areas** close by.
- 5.30. There are no **nature reserves** close to the site: the Leeds-Liverpool Canal is a local wildlife site (non-statutory, around 1.1km to the north) and Everton Park and Nature Garden is also a local wildlife site (around 1.7km north-east).
- 5.31. The closest **parks** to the site are small urban parks, for example at Liverpool Parish Church (around 300m to the south-west) and St John's Gardens (around 600m to the east). A new area of open space will form part of the proposed development. It should be noted that a wind microclimate assessment of the proposal has shown that the new open space will be within wind safety criteria and within wind comfort criteria associated with the intended use of the open space (ie long-term sitting or short-term sitting or standing).
- 5.32. The following statutorily designated sites (under either **European** or **national** legislation) are within 2km of the site:
- Liverpool Bay SPA (c0.6km to the west);
 - Mersey Narrows & North Wirral Foreshore SPA / Ramsar (c1.5km to the west);
 - Mersey Narrows SSSI (c1.5km to the west).
 - The site is within the SSSI Impact Risk Zone for the above designations, but the

forthcoming planning application will not trigger mandatory consultation with Natural England as the proposed development is not within the types of development listed as requiring such consultation.

- 5.33. There are several roads within Liverpool city centre where NO₂ levels have exceeded the AQS objective of 40µg/m³, resulting in a failure to meet **EU environmental quality standards**. The development is likely to reduce the amount of traffic in the local road network.
- 5.34. As the site is in the centre of Liverpool, the surrounding area is a **densely populated area**.
- 5.35. As the site is in the centre of Liverpool, there are landscapes and sites of **historical and cultural significance** in the surrounding area:
- Castle Street Conservation Area generally has a high heritage significance (albeit the part within the site boundary has negligible heritage significance);
 - The World Heritage Site has high heritage significance;
 - The eight listed buildings close to the site have medium heritage significance if Grade II, or high heritage significance if Grade II*.
- 5.36. Previous archaeological assessment of the site has found low (or no) archaeological potential (including the assessment that accompanied planning permission 18F/2614).

Types and characteristics of the potential impact

- 5.37. The table below applies the types and characteristics of the impacts (column 1) to the factors set out in Regulation 4(2).

| | a) Population and human health | b) Biodiversity | c) Land, soil, water, air and climate | d) Material assets, cultural heritage and the landscape | The interaction between the factors a)-d) |
|--|---|-----------------------------|--|---|--|
| (a) the magnitude and spatial extent of the impact (for example geographical area and size of the population likely to be affected); | Potential for very localised effects on amenity through changes to daylight and sunlight, ie habitable rooms facing the development . | Unlikely to be any effects. | Potential for some localised improvements to air quality through reduction in traffic. | <p>Potential for some effects on the setting of nearby listed buildings.</p> <p>Potential for some effects on the World Heritage Site.</p> <p>Effects will be upon settings and the magnitude of effect will depend upon the contribution that the settings make to the significance of the assets.</p> | Potential positive interaction between air quality and human health within local area. |

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| (b) the nature of the impact; | Reduced daylight and sunlight to some habitable rooms. | Unlikely to be any effects | Potential for decreased NO2 associated with traffic movements. | Potential for impact on settings but unlikely to affect assets' significance or the outstanding value of the World Heritage Site. | Potential for improved air quality and associated benefits for human health. |
| (c) the transboundary nature of the impact; | N/A | N/A | N/A | N/A | N/A |
| (d) the intensity and complexity of the impact; | Modellable via Daylight and Sunlight Assessment, having regard to BRE guidelines. | Unlikely to be any effects. | Minor positive effects. | Effects will be assessed through Landscape and Visual Impact Assessment and via Heritage Assessment. | Improved air quality likely to be minor. |
| (e) the probability of the impact; | Changes to the daylight and sunlight can be modelled accurately but resultant effects subjective to personal perception. | Unlikely to be any effects. | Probable, should local traffic reduce. | Possible but understandable via LVIA / HIA. | Possible improved human health via improved air quality associated with reduction in local traffic. |
| (f) the expected onset, duration, frequency and reversibility of the impact; | Impacts will commence upon construction and remain permanently. | Unlikely to be any effects. | Likely to fluctuate in the short-term and be more noticeable in the long-term. | Effects would be permanent. | Effects would likely fluctuate over time. |
| (g) the cumulation of the impact with the impact of other existing and/or approved development; | Potential cumulation of effects with approved development at 30-36 Pall Mall. | Unlikely to be any cumulation of effects. | Unlikely to be any cumulation of effects. | Possible for cumulative effects with approved developments, but understandable via LVIA / HIA. | Cumulation of effects unlikely to be significant. |
| (h) the possibility of effectively reducing the impact. | Limited possibility to reduce the impact. | New landscaping will provide positive effects. | Inclusion of electric vehicle charging points, cycle parking and good pedestrian | Good design will help minimise effects on assets. | Changes to air quality likely to be positive. |

| | | | | | |
|--|--|--|---|--|--|
| | | | environment will help improve air quality. | | |
|--|--|--|---|--|--|

Planning application

- 5.38. The planning application is likely to be accompanied by the following reports.

Design and access statement

- 5.39. This will set out the approach chosen to design and access, including rationale and design evolution. It will reflect the site's context and demonstrate why the design is appropriate.

Phase 1 ground conditions

- 5.40. This will assess the ground conditions and any consequential risks associated with the proposed development. It will recommend further assessment work and mitigation / remediation as appropriate. Initial assessment work already undertaken takes into account the baseline scenario of the site being remediated pursuant to an existing planning permission, whilst the report will also ensure any further remediation that may be required specific to the proposed use is carried out prior to any development commencing.

Daylight and sunlight assessment

- 5.41. This will assess the impact of the proposed development upon the amenity of residential receptors, in terms of daylight and sunlight.

Drainage strategy

- 5.42. This will set out how the site will conform to the principles of sustainable drainage.

Flood risk assessment

- 5.43. This will show there is no risk of flooding associated with the development (on and off site), taking into account climate change.

Heritage statement

- 5.44. This will consider the effect of the development upon the significance of heritage assets; in this case, it will consider the contribution of assets' settings to their significance and the potential for any harm to their significance. It will also include a report assessing the impact of the development upon the outstanding universal value of the World Heritage Site.
- 5.45. There will be no direct impacts on any heritage assets.
- 5.46. There will be a major change to the layout and appearance of the site, but in terms of setting of heritage assets, the change will be considered in conjunction with existing and approved developments, which include far taller buildings than those proposed in this development.
- 5.47. Views to, from and within the World Heritage Site have been considered. There will be no intrusion into key views or vistas, and the design of the buildings and the public realm will be sensitive to the heritage assets in terms of massing, architecture, layout and materials. The urban grain and spatial structure of the development will be enhanced by the replacement of the surface car park and open space with new, well-designed, buildings and integrated public realm.

- 5.48. There will be no meaningful harm to cultural significance or the World Heritage Site's distinctive character, or the historic townscape elements or the important skyline features.

Landscape and visual impact assessment

- 5.49. This will consider the impact of the development upon key views and the city's townscape, using verified views. Verified views are provided in **Appendix 2**. These show that the proposal will assimilate into the cluster of existing and approved tall buildings within the central business district, and therefore significant visual effects or impacts upon sensitive landscapes are not expected.

Minimum accessibility standard assessment

- 5.50. This is a validation requirement and is a *pro forma*; it will show how accessible the site and the development is by a range of sustainable transport modes.

Sustainability statement

- 5.51. This will summarise the development's approach to sustainability, including design and energy efficiency. The development is being designed with the aim of being BREEAM excellent.

Transport assessment

- 5.52. This will set out how accessible the development will be, and consider traffic and parking associated with the development; it will show a predicted reduction in local traffic associated with the development.

Waste management strategy

- 5.53. This will set out how waste will be handled in accordance with the waste hierarchy.

Wind Microclimate assessment

- 5.54. This is provided in **Appendix 3**. It concludes that both Building A in isolation, and the full proposed development in cumulation with approved developments, will create generally suitable comfortable and safe wind conditions. There is likely to be some reduced comfort in small parts of the site compared with baseline conditions, but these remain with the acceptable ratings (using the 'Lawson Criteria'). The assessment is a worse-case scenario, because it does not take any proposed soft landscaping into account, which would almost certainly improve the wind environment.

6. Conclusions

- 6.1. This screening report considers the likelihood of significant environmental effects arising from the proposed development, including in cumulation with existing and approved developments. It accords with the Regulations and has regard to Planning Practice Guidance.
- 6.2. It concludes there may be some positive impacts on air quality due to a likely reduction in local traffic, which will potentially have a minor positive impact on human health.
- 6.3. It concludes that there may be some adverse impacts on the amenity of local residents within the immediate vicinity of the proposed development, but these will be able to be fully assessed via a daylight and sunlight assessment and in any case the effects will tend to be on amenity rather than human health and therefore not significant in terms of environmental impact.
- 6.4. There will be no direct impact on any designated heritage assets. There will be indirect impacts on the settings of heritage assets and the world heritage site, but the approach to design to be controlled via design codes within the planning application will mitigate any potential for significant negative effects upon cultural heritage.
- 6.5. The potential cumulation of effects of other tall buildings in conjunction with the proposed development will be fully assessed via the Wind Microclimate Assessment and LVIA. As the proposed development will assimilate into the surrounding townscape in long distance views, significant effects are not likely.

Mitigation

- 6.6. It is expected that the only mitigation required to reduce the potential for significant environmental impacts will be a Construction Management Plan to control potential effects during the construction phase, which will be secured via planning condition, and a series of design codes within the planning application to control future detailed proposals for the outline elements of the application.

Summary

- 6.7. Given the site location and surrounding environment, the characteristics of the development and the potential types and characteristics of potential effects, it is concluded that there will be no significant environmental effects such that the proposed development should be subject to environmental impact assessment.

Appendix 1

Appendix 2

Appendix 2 – Verified views (separate document)

Appendix 3

Appendix 3 – Wind microclimate assessment (separate document)

