

Tom Peacock

From: Nikki Sills <Nikki.Sills@zerum.co.uk>
Sent: 14 December 2021 13:41
To: Helen Lund; Tom Peacock; Tony Hanna; Christian Gilahm; Ka Yin Man; katy.lightbody@turley.co.uk; Rob Mayers; Kevin Gilsenan
Cc: Tony Connor; Lee Spink; Andrew Duffy
Subject: FW: Apex Tower - EIA Scoping
Attachments: Natural England.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

****External Email. This email originated from outside Buro Happold.****

Hi All

Please see initial response from MCC re EIA Scoping Report. These are the consultation responses received to date. They are drip feeding them through as they get them. There may be more to follow.

Can everyone please make sure that the comments are picked up by their ES Chapters/Standalone Reports.

Kevin – are you comfortable that your flood and drainage report picks up the comments below?

Helen/Tom – call me if you need to discuss.

Any issues let me know.

Thanks

Nikki

Nikki Sills

Divisional Director

MA (Hons) MSc MRTPI

Manchester

0161 667 0990
07824 380 799

[Click here to visit our website](#)



Zerum Consult Limited
4 Jordan Street
Manchester, M15 4PY
T: 0161 667 0990

5th Floor, 36-38
The Calls,
Leeds, LS2 7EW
T: 0113 532 7676

E: info@zerum.co.uk
W: www.zerum.co.uk

Zerum would like to reassure you that in respect of the spread of coronavirus, we have put into effect mitigation and contingency planning. We continue to closely monitor the Government advice and have measures in place to ensure that Zerum continue to work with you during this period.

- We are following government advice in that all staff members who have capability to work from home will do so.
- All staff members will be contactable on their mobile phones and all calls made to the landline will be answered by our receptionist and a message relayed via email to staff.
- Our IT systems are robust and we have the ability to work remotely and securely from home with full accessibility to our IT systems.
- Our projects will continue to be managed by the Directors and Partners of Zerum allowing us to respond quickly to staff absence, re-allocating resources to progress the work as required.
- We hold daily video and conference calls to maintain communication between all staff members to update on progress and matters arising.
- We have requested all Zerum staff to minimise face to face meetings and if possible make alternative conferencing arrangements.
- We will attend key meetings/site visits in person where necessary and maintain social distancing measures advised by government.

This email is intended for the named recipient(s) only. Information in this email is privileged, confidential, subject to copyright and may contain personal information. If you have received this message in error, please notify the sender immediately and destroy the email. Whilst all efforts are made to safeguard emails, Zerum cannot guarantee that attachments are virus free or compatible with the recipient's systems and as such does not accept liability in respect of viruses or any computer problems experienced.

From: James Hughes <James.Hughes@manchester.gov.uk>

Sent: 14 December 2021 13:09

To: Nikki Sills <Nikki.Sills@zerum.co.uk>

Subject: RE: Apex Tower - EIA Scoping

Hi Nikki,

No problem, a summary of responses so far are:

Archaeology

GMAAS concurs with this conclusion, and considers that the below-ground archaeology has the potential to be of local to regional significance. GMAAS accept that the archaeology is unlikely to be of national significance, and is satisfied that archaeology can be scoped out of the EIA providing that a detailed archaeological desk-based assessment is submitted with the planning application. This will enable a decision to be reached as to the merits of undertaking further archaeological investigation of the site in advance of development. GMAAS will be content to see any such work secured through a negative planning condition attached to consent.

The Scoping Report also includes a section on the built heritage, which proposes that a dedicated chapter on heritage will be compiled for inclusion in the Environmental Statement. Whilst the Conservation & Urban Design Team at Manchester City Council may wish to comment further, GMAAS is satisfied that the proposed scope and methodology for the proposed heritage chapter is entirely appropriate.

Historic England

This development could, potentially, have an impact upon a number of designated heritage assets and their settings in the area around the site. In line with the advice in the National Planning Policy Framework (NPPF), we would expect the Environmental Statement to contain a thorough assessment of the likely effects which the proposed development might have upon those elements which contribute to the significance of these assets. This is considered in section 6.6 of the submitted scoping report, which also sets out the scope of assets to be considered as part of the EIA, and the proposed methodology.

This methodology is generally acceptable. However, given the height of the proposed development, it is likely that it will be intermittently visible across a large area and could, as a result, affect the significance of heritage assets at some distance from this site itself. We would expect the assessment to clearly demonstrate that the extent of the proposed study area is of the appropriate size to ensure that all heritage assets likely to be affected by this development have been included and can be properly assessed.

We would also expect the Environmental Statement to consider the potential impacts on non-designated features of historic, architectural, archaeological or artistic interest, since these can also be of national importance and make an important contribution to the character and local distinctiveness of an area and its sense of place. This information is available via the local authority Historic Environment Record (www.heritagegateway.org.uk <<http://www.heritagegateway.org.uk>>) and relevant local authority staff.

We would strongly recommend that you involve the Conservation Officer of Manchester City Council and the archaeological staff at Greater Manchester Archaeological Advisory Service in the development of this assessment. They are best placed to advise on: local historic environment issues and priorities; how the proposal can be tailored to avoid and minimise potential adverse impacts on the historic environment; the nature and design of any required mitigation measures; and opportunities for securing wider benefits for the future conservation and management of heritage assets.

The assessment should also take account of the potential impact which associated activities (such as construction, servicing and maintenance, and associated traffic) might have upon perceptions, understanding and appreciation of the heritage assets in the area. The assessment should also consider, where appropriate, the likelihood of alterations to drainage patterns that might lead to in situ decomposition or destruction of below ground archaeological remains and deposits, and can also lead to subsidence of buildings and monuments.

Lead Local Flood Authority

The proposed development is situated within Flood Zone 1.

The proposed development is generally within an area at very low risk of surface water flooding.

The proposed development is not indicated from data available to be susceptible to groundwater flooding, however ground investigation results should be considered.

MCC does not hold any recorded incidents of flooding within the site or close vicinity.

The site is ca. 40 m north of the Rochdale Canal.

The LLFA asset register indicates a culverted ordinary watercourse approximately 80 m northeast of the site.

The area is situated within a Critical Drainage Area and in accordance with the Manchester City Council SFRA at least a 50% reduction in surface water runoff should be provided through SuDS as part of any brownfield development with the aim of reducing to the Greenfield runoff rates.

Surface water should be managed to ensure there is no increased surface water from the proposed development and runoff from extreme events should be retained within the site such that the adjacent third party land is not affected.

The suitability of sustainable drainage systems should be assessed in accordance with the NPPF. Progression through the drainage hierarchy shall only be permitted where evidence based.

Sustainable drainage systems should be designed in line with national Non-Statutory Technical Standards for SuDS and local policies EN08, EN14 and EN17 of the Core Strategy.

Hydraulic calculations and drawings to support the design need to be provided along with proposed standards of operation and maintenance in accordance with the NPPF.

Any proposed discharge rate and connection point must be agreed with any relevant authority for the receiving asset.

The impacts of Climate Change should be considered and embedded design presented in the Flood Risk Assessment and Drainage Strategy. This should ensure appropriate resistance and resilience to flood risk, and demonstrate mitigation of Climate Change through maximised integration of green SuDS components.

Group Aerodrome Safeguarding Officer

The Apex Tower site lies within Manchester Airport's safeguarded area and consideration should therefore be made to whether development within the area causes: an obstacle; an attraction to birds; light or reflection that might present a visual hazard; interference with radar and other air navigation and communication systems and whether the construction process will present any hazard to aircraft safety.

When considering the type, scale and design of any development within the Apex Tower area, we therefore recommend that consideration of the relevant aerodrome safeguarding criteria, consultation procedures, and any potential impacts on aircraft safety are addressed. This will principally relate to the height of buildings at this location and whether there is any potential interference to RADAR operations. We endorse the value of promoting early engagement with stakeholders and would therefore welcome any pre-application consultation to discuss the implications of proposals as they take shape.

Natural England

The response from Natural England has been attached for ease due to the amount of information.

Please let me know if you need anything else at this time.

Kind regards,
James

James Hughes
Planning Officer

Development Management City Centre
Planning Building Control and Licensing - Growth and Development
Manchester City Council

Tel: 0161 600 8772
Email: james.hughes@manchester.gov.uk
www.manchester.gov.uk

Location address: Manchester City Council Town Hall Extension Lloyd Street Manchester M2 5DB.
Postal Address: Manchester City Council P.O. Box 532 Town Hall Manchester M60 2LA

Working days over the Christmas/New Year period are as follows:

- Friday 24 December 2021: Non-working Day*
- Monday 27 – Tuesday 28 December 2021: Bank Holidays*
- Wednesday 29 – Friday 31 December 2021: Working Days*
- Monday 03 January 2022 – Bank Holiday*
- Tuesday 04 January 2022 – Return to normal working pattern*

Date: 08 December 2021
Our ref: 376823
Your ref: Apex Tower



James Hughes
Manchester City Council
james.hughes@manchester.gov.uk

Consultations
Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 900

BY EMAIL ONLY

Dear Mr Hughes

Environmental Impact Assessment Scoping consultation (Regulation 15 (4) of the Town and Country Planning EIA Regulations 2017): Apex Tower - EIA Scoping Opinion for residential development up to 79 apartments and commercial office space

Location: Land adjacent to Albion St and Trumpet St Manchester City Centre

Thank you for seeking our advice on the scope of the Environmental Statement (ES) in the consultation dated 30 November 2021 ,received on 30 November 2021.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

A robust assessment of environmental impacts and opportunities based on relevant and up to date environmental information should be undertaken prior to a decision on whether to grant planning permission. Annex A to this letter provides Natural England's advice on the scope of the Environmental Impact Assessment (EIA) for the proposed development.

Further guidance is set out in Planning Practice Guidance on [environmental assessment, natural environment and climate change](#).

Should the proposal be amended in a way which significantly affects its impact on the natural environment then, in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, Natural England should be consulted again.

Please note that Natural England must be consulted on Environmental Statements.

Please send any new consultations or further information on this consultation to consultations@naturalengland.org.uk.

Yours sincerely

Joe Thorpe
Consultations Team

Annex A – Natural England Advice on EIA Scoping

General Principles

[Schedule 4](#) of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017, sets out the information that should be included in an Environmental Statement (ES) to assess impacts on the natural environment. This includes:

- A description of the development – including physical characteristics and the full land use requirements of the site during construction and operational phases
- Expected residues and emissions (water, air and soil pollution, noise, vibration, light, heat, radiation etc.) resulting from the operation of the proposed development
- An assessment of alternatives and clear reasoning as to why the preferred option has been chosen
- A description of the aspects of the environment likely to be significantly affected by the development including biodiversity (for example fauna and flora), land, including land take, soil, water, air, climate (for example greenhouse gas emissions, impacts relevant to adaptation, cultural heritage and landscape and the interrelationship between the above factors
- A description of the likely significant effects of the development on the environment – this should cover direct effects but also any indirect, secondary, cumulative, short, medium, and long term, permanent and temporary, positive, and negative effects. Effects should relate to the existence of the development, the use of natural resources (in particular land, soil, water and biodiversity) and the emissions from pollutants. This should also include a description of the forecasting methods to predict the likely effects on the environment
- A description of the measures envisaged to prevent, reduce and where possible offset any significant adverse effects on the environment
- A non-technical summary of the information
- An indication of any difficulties (technical deficiencies or lack of know-how) encountered by the applicant in compiling the required information

Further guidance is set out in Planning Practice Guidance on [environmental assessment](#) and [natural environment](#).

Cumulative and in-combination effects

The ES should fully consider the implications of the whole development proposal. This should include an assessment of all supporting infrastructure.

An impact assessment should identify, describe, and evaluate the effects that are likely to result from the project in combination with other projects and activities that are being, have been or will be carried out. The following types of projects should be included in such an assessment (subject to available information):

- a. existing completed projects;
- b. approved but uncompleted projects;
- c. ongoing activities;
- d. plans or projects for which an application has been made and which are under consideration by the consenting authorities; and
- e. plans and projects which are reasonably foreseeable, i.e. projects for which an application has not yet been submitted, but which are likely to progress before completion of the development and for which sufficient information is available to assess the likelihood of cumulative and in-combination effects.

Environmental data

Natural England is required to make available information it holds where requested to do so. National datasets held by Natural England are available at <http://www.naturalengland.org.uk/publications/data/default.aspx>.

Detailed information on the natural environment is available at www.magic.gov.uk.

Natural England's SSSI Impact Risk Zones are a GIS dataset which can be used to help identify the potential for the development to impact on a SSSI. The dataset and user guidance can be accessed from the [Natural England Open Data Geoportal](#).

Natural England does not hold local information on local sites, local landscape character, priority habitats and species or protected species. Local environmental data should be obtained from the appropriate local bodies. This may include the local environmental records centre, the local wildlife trust, local geo-conservation group or other recording society.

Biodiversity and Geodiversity

General principles

The [National Planning Policy Framework](#) (paragraphs 174-175 and 179-182) sets out how to take account of biodiversity and geodiversity interests in planning decisions. Further guidance is set out in Planning Practice Guidance on the [natural environment](#).

The potential impact of the proposal upon sites and features of nature conservation interest and opportunities for nature recovery and biodiversity net gain should be included in the assessment.

Ecological Impact Assessment (EclA) is the process of identifying, quantifying, and evaluating the potential impacts of defined actions on ecosystems or their components. EclA may be carried out as part of the EIA process or to support other forms of environmental assessment or appraisal. [Guidelines](#) have been developed by the Chartered Institute of Ecology and Environmental Management (CIEEM).

Local planning authorities have a [duty](#) to have regard to conserving biodiversity as part of their decision making. Conserving biodiversity can include habitat restoration or enhancement. Further information is available [here](#).

Designated nature conservation sites

The proposal is unlikely to adversely impact any European or internationally designated nature conservation sites (including 'habitats sites' under the NPPF) or nationally designated sites (Sites of Special Scientific Interest, National Nature Reserves or Marine Conservation Zones).

Regionally and Locally Important Sites

The ES should consider any impacts upon local wildlife and geological sites, including local nature reserves. Local Sites are identified by the local wildlife trust, geoconservation group or other local group and protected under the NPPF (paragraph 174 and 175). The ES should set out proposals for mitigation of any impacts and if appropriate, compensation measures and opportunities for enhancement and improving connectivity with wider ecological networks. Contact the relevant local body for further information.

Protected Species

The conservation of species protected under the Wildlife and Countryside Act 1981 and the Conservation of Habitats and Species Regulations 2017 is explained in Part IV and Annex A of Government Circular 06/2005 [*Biodiversity and Geological Conservation: Statutory Obligations and their Impact within the Planning System*](#).

The ES should assess the impact of all phases of the proposal on protected species (including, for example, great crested newts, reptiles, birds, water voles, badgers and bats). Natural England does not hold comprehensive information regarding the locations of species protected by law. Records of protected species should be obtained from appropriate local biological record centres, nature conservation organisations and local groups. Consideration should be given to the wider context of the site, for example in terms of habitat linkages and protected species populations in the wider area.

The area likely to be affected by the development should be thoroughly surveyed by competent ecologists at appropriate times of year for relevant species and the survey results, impact assessments and appropriate accompanying mitigation strategies included as part of the ES. Surveys should always be carried out in optimal survey time periods and to current guidance by suitably qualified and, where necessary, licensed, consultants.

Natural England has adopted [standing advice](#) for protected species, which includes guidance on survey and mitigation measures. A separate protected species licence from Natural England or Defra may also be required.

District Level Licensing for Great Crested Newts

District level licensing (DLL) is a type of strategic mitigation licence for great crested newts (GCN) granted in certain areas at a local authority or wider scale. A [DLL scheme for GCN](#) may be in place at the location of the development site. If a DLL scheme is in place, developers can make a financial contribution to strategic, off-site habitat compensation instead of applying for a separate licence or carrying out individual detailed surveys. By demonstrating that DLL will be used, impacts on GCN can be scoped out of detailed assessment in the Environmental Statement.

Priority Habitats and Species

Priority Habitats and Species are of particular importance for nature conservation and included in the England Biodiversity List published under section 41 of the Natural Environment and Rural Communities Act 2006. Most priority habitats will be mapped either as Sites of Special Scientific Interest, on the Magic website or as Local Wildlife Sites. Lists of priority habitats and species can be found [here](#). Natural England does not routinely hold species data. Such data should be collected when impacts on priority habitats or species are considered likely.

Consideration should also be given to the potential environmental value of brownfield sites, often found in urban areas and former industrial land. Sites can be checked against the (draft) national Open Mosaic Habitat (OMH) inventory published by Natural England and freely available to [download](#). Further information is also available [here](#).

An appropriate level habitat survey should be carried out on the site, to identify any important habitats present. In addition, ornithological, botanical, and invertebrate surveys should be carried out at appropriate times in the year, to establish whether any scarce or priority species are present.

The Environmental Statement should include details of:

- Any historical data for the site affected by the proposal (e.g. from previous surveys)
- Additional surveys carried out as part of this proposal
- The habitats and species present

- The status of these habitats and species (e.g. whether priority species or habitat)
- The direct and indirect effects of the development upon those habitats and species
- Full details of any mitigation or compensation measures
- Opportunities for biodiversity net gain or other environmental enhancement

Ancient Woodland, ancient and veteran trees

The ES should assess the impacts of the proposal on any ancient woodland, ancient and veteran trees, and the scope to avoid and mitigate for adverse impacts. It should also consider opportunities for enhancement.

Natural England maintains the Ancient Woodland [Inventory](#) which can help identify ancient woodland. The [wood pasture and parkland inventory](#) sets out information on wood pasture and parkland.

The [ancient tree inventory](#) provides information on the location of ancient and veteran trees.

Natural England and the Forestry Commission have prepared [standing advice](#) on ancient woodland, ancient and veteran trees.

Biodiversity net gain

Paragraph 174 of the NPPF states that decisions should contribute to and enhance the natural and local environment by minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures.

Biodiversity Net Gain is additional to statutory requirements relating to designated nature conservation sites and protected species.

The ES should use an appropriate biodiversity metric such as [Biodiversity Metric 3.0](#) together with ecological advice to calculate the change in biodiversity resulting from proposed development and demonstrate how proposals can achieve a net gain.

The metric should be used to:

- assess or audit the biodiversity unit value of land within the application area
- calculate the losses and gains in biodiversity unit value resulting from proposed development
- demonstrate that the required percentage biodiversity net gain will be achieved

Biodiversity Net Gain outcomes can be achieved on site, off-site or through a combination of both. On-site provision should be considered first. Delivery should create or enhance habitats of equal or higher value. When delivering net gain, opportunities should be sought to link delivery to relevant plans or strategies e.g. Green Infrastructure Strategies or Local Nature Recovery Strategies.

Opportunities for wider environmental gains should also be considered.

Landscape

Landscape and visual impacts

The environmental assessment should refer to the relevant [National Character Areas](#). Character area profiles set out descriptions of each landscape area and statements of environmental opportunity.

The ES should include a full assessment of the potential impacts of the development on local landscape character using [landscape assessment methodologies](#). We encourage the use of Landscape Character Assessment (LCA), based on the good practice guidelines produced jointly by the Landscape Institute and Institute of Environmental Assessment in 2013. LCA provides a sound

basis for guiding, informing, and understanding the ability of any location to accommodate change and to make positive proposals for conserving, enhancing or regenerating character.

A landscape and visual impact assessment should also be carried out for the proposed development and surrounding area. Natural England recommends use of the methodology set out in *Guidelines for Landscape and Visual Impact Assessment 2013* ((3rd edition) produced by the Landscape Institute and the Institute of Environmental Assessment and Management. For National Parks and AONBs, we advise that the assessment also includes effects on the 'special qualities' of the designated landscape, as set out in the statutory management plan for the area. These identify the particular landscape and related characteristics which underpin the natural beauty of the area and its designation status.

The assessment should also include the cumulative effect of the development with other relevant existing or proposed developments in the area. This should include an assessment of the impacts of other proposals currently at scoping stage.

To ensure high quality development that responds to and enhances local landscape character and distinctiveness, the siting and design of the proposed development should reflect local characteristics and, wherever possible, use local materials. Account should be taken of local design policies, design codes and guides as well as guidance in the [National Design Guide](#) and [National Model Design Code](#). The ES should set out the measures to be taken to ensure the development will deliver high standards of design and green infrastructure. It should also set out detail of layout alternatives, where appropriate, with a justification of the selected option in terms of landscape impact and benefit.

Heritage Landscapes

The ES should include an assessment of the impacts on any land in the area affected by the development which qualifies for conditional exemption from capital taxes on the grounds of outstanding scenic, scientific, or historic interest. An up-to-date list is available at www.hmrc.gov.uk/heritage/lbsearch.htm.

Connecting People with nature

The ES should consider potential impacts on access land, common land, public rights of way and, where appropriate, the England Coast Path and coastal access routes and coastal margin in the vicinity of the development, in line with NPPF paragraph 100. It should assess the scope to mitigate for any adverse impacts. Rights of Way Improvement Plans (ROWIP) can be used to identify public rights of way within or adjacent to the proposed site that should be maintained or enhanced.

Measures to help people to better access the countryside for quiet enjoyment and opportunities to connect with nature should be considered. Such measures could include reinstating existing footpaths or the creation of new footpaths, cycleways, and bridleways. Links to other green networks and, where appropriate, urban fringe areas should also be explored to help promote the creation of wider green infrastructure. Access to nature within the development site should also be considered, including the role that natural links have in connecting habitats and providing potential pathways for movements of species.

Relevant aspects of local authority green infrastructure strategies should be incorporated where appropriate.

Soils and Agricultural Land Quality

Soils are a valuable, finite natural resource and should also be considered for the ecosystem services they provide, including for food production, water storage and flood mitigation, as a carbon store, reservoir of biodiversity and buffer against pollution. It is therefore important that the soil

resources are protected and sustainably managed. Impacts from the development on soils and best and most versatile (BMV) agricultural land should be considered in line with paragraphs 174 and 175 of the NPPF. Further guidance is set out in the Natural England [Guide to assessing development proposals on agricultural land](#).

As set out in paragraph 211 of the NPPF, new sites or extensions to sites for peat extraction should not be granted planning permission.

The following issues should be considered and, where appropriate, included as part of the Environmental Statement (ES):

- The degree to which soils would be disturbed or damaged as part of the development
- The extent to which agricultural land would be disturbed or lost as part of this development, including whether any best and most versatile (BMV) agricultural land would be impacted.

This may require a detailed Agricultural Land Classification (ALC) survey if one is not already available. For information on the availability of existing ALC information see www.magic.gov.uk.

- Where an ALC and soil survey of the land is required, this should normally be at a detailed level, e.g. one auger boring per hectare, (or more detailed for a small site) supported by pits dug in each main soil type to confirm the physical characteristics of the full depth of the soil resource, i.e. 1.2 metres. The survey data can inform suitable soil handling methods and appropriate reuse of the soil resource where required (e.g. agricultural reinstatement, habitat creation, landscaping, allotments and public open space).
- The ES should set out details of how any adverse impacts on BMV agricultural land can be minimised through site design/masterplan.
- The ES should set out details of how any adverse impacts on soils can be avoided or minimised and demonstrate how soils will be sustainably used and managed, including consideration in site design and master planning, and areas for green infrastructure or biodiversity net gain. The aim will be to minimise soil handling and maximise the sustainable use and management of the available soil to achieve successful after-uses and minimise off-site impacts.

Further information is available in the [Defra Construction Code of Practice for the Sustainable Use of Soil on Development Sites](#) and

The British Society of Soil Science Guidance Note [Benefitting from Soil Management in Development and Construction](#).

Air Quality

Air quality in the UK has improved over recent decades but air pollution remains a significant issue. For example, approximately 85% of protected nature conservation sites are currently in exceedance of nitrogen levels where harm is expected (critical load) and approximately 87% of sites exceed the level of ammonia where harm is expected for lower plants (critical level of 1µg) ^[1]. A priority action in the England Biodiversity Strategy is to reduce air pollution impacts on biodiversity. The Government's Clean Air Strategy also has a number of targets to reduce emissions including to reduce damaging deposition of reactive forms of nitrogen by 17% over England's protected priority sensitive habitats by 2030, to reduce emissions of ammonia against the 2005 baseline by 16% by 2030 and to reduce emissions of NO_x and SO₂ against a 2005 baseline of 73% and 88% respectively by 2030. Shared Nitrogen Action Plans (SNAPs) have also been identified as a tool to

^[1] [Report: Trends Report 2020: Trends in critical load and critical level exceedances in the UK - Defra, UK](#)

reduce environmental damage from air pollution.

The planning system plays a key role in determining the location of developments which may give rise to pollution, either directly, or from traffic generation, and hence planning decisions can have a significant impact on the quality of air, water and land. The ES should take account of the risks of air pollution and how these can be managed or reduced. This should include taking account of any strategic solutions or SNAPs, which may be being developed or implemented to mitigate the impacts on air quality. Further information on air pollution impacts and the sensitivity of different habitats/designated sites can be found on the Air Pollution Information System (www.apis.ac.uk).

Information on air pollution modelling, screening and assessment can be found on the following websites:

- SCAIL Combustion and SCAIL Agriculture - <http://www.scail.ceh.ac.uk/>
- Ammonia assessment for agricultural development <https://www.gov.uk/guidance/intensive-farming-risk-assessment-for-your-environmental-permit>
- Environment Agency Screening Tool for industrial emissions <https://www.gov.uk/guidance/air-emissions-risk-assessment-for-your-environmental-permit>
- Defra Local Air Quality Management Area Tool (Industrial Emission Screening Tool) – England <http://www.airqualityengland.co.uk/laqm>

Water Quality

The planning system plays a key role in determining the location of developments which may give rise to water pollution, and hence planning decisions can have a significant impact on water quality, and land. The assessment should take account of the risks of water pollution and how these can be managed or reduced. A number of water dependent protected nature conservation sites have been identified as failing condition due to elevated nutrient levels and nutrient neutrality is consequently required to enable development to proceed without causing further damage to these sites. The ES needs to take account of any strategic solutions for nutrient neutrality or Diffuse Water Pollution Plans, which may be being developed or implemented to mitigate and address the impacts of elevated nutrient levels. Further information can be obtained from the Local Planning Authority.

Climate Change

The ES should identify how the development affects the ability of the natural environment (including habitats, species, and natural processes) to adapt to climate change, including its ability to provide adaptation for people. This should include impacts on the vulnerability or resilience of a natural feature (i.e. what's already there and affected) as well as impacts on how the environment can accommodate change for both nature and people, for example whether the development affects species ability to move and adapt. Nature-based solutions, such as providing green infrastructure on-site and in the surrounding area (e.g. to adapt to flooding, drought and heatwave events), habitat creation and peatland restoration, should be considered. The ES should set out the measures that will be adopted to address impacts.

Further information is available from the [Committee on Climate Change's](#) (CCC) [Independent Assessment of UK Climate Risk](#), the [National Adaptation Programme](#) (NAP), the [Climate Change Impacts Report Cards](#) (biodiversity, infrastructure, water etc.) and the [UKCP18 climate projections](#).

The Natural England and RSPB [Climate Change Adaptation Manual](#) (2020) provides extensive information on climate change impacts and adaptation for the natural environment and adaptation focussed nature-based solutions for people. It includes the Landscape Scale Climate Change Assessment Method that can help assess impacts and vulnerabilities on natural environment features and identify adaptation actions. Natural England's [Nature Networks Evidence Handbook](#) (2020) also provides extensive information on planning and delivering nature networks for people and biodiversity.

The ES should also identify how the development impacts the natural environment's ability to store and sequester greenhouse gases, in relation to climate change mitigation and the natural environment's contribution to achieving net zero by 2050. Natural England's [Carbon Storage and Sequestration by Habitat report](#) (2021) and the British Ecological Society's [nature-based solutions report](#) (2021) provide further information.

Contribution to local environmental initiatives and priorities

The ES should consider the contribution the development could make to relevant local environmental initiatives and priorities to enhance the environmental quality of the development and deliver wider environmental gains. This should include considering proposals set out in relevant local strategies or supplementary planning documents including landscape strategies, green infrastructure strategies, tree and woodland strategies, biodiversity strategies or biodiversity opportunity areas.

Tom Peacock

From: Nikki Sills <Nikki.Sills@zerum.co.uk>
Sent: 21 December 2021 12:35
To: Tom Peacock; Helen Lund
Subject: FW: Apex Tower

****External Email. This email originated from outside Buro Happold.****

FYI

Nikki Sills

Divisional Director

MA (Hons) MSc MRTPI

Manchester

0161 667 0990
07824 380 799

[Click here to visit our website](#)



Zerum Consult Limited 4 Jordan Street Manchester, M15 4PY T: 0161 667 0990	5th Floor, 36-38 The Calls, Leeds, LS2 7EW T: 0113 532 7676	E: info@zerum.co.uk W: www.zerum.co.uk
---	--	--

Zerum would like to reassure you that in respect of the spread of coronavirus, we have put into effect mitigation and contingency planning. We continue to closely monitor the Government advice and have measures in place to ensure that Zerum continue to work with you during this period.

- We are following government advice in that all staff members who have capability to work from home will do so.
- All staff members will be contactable on their mobile phones and all calls made to the landline will be answered by our receptionist and a message relayed via email to staff.
- Our IT systems are robust and we have the ability to work remotely and securely from home with full accessibility to our IT systems.
- Our projects will continue to be managed by the Directors and Partners of Zerum allowing us to respond quickly to staff absence, re-allocating resources to progress the work as required.
- We hold daily video and conference calls to maintain communication between all staff members to update on progress and matters arising.
- We have requested all Zerum staff to minimise face to face meetings and if possible make alternative conferencing arrangements.
- We will attend key meetings/site visits in person where necessary and maintain social distancing measures advised by government.

This email is intended for the named recipient(s) only. Information in this email is privileged, confidential, subject to copyright and may contain personal information. If you have received this message in error, please notify the sender immediately and destroy the email. Whilst all efforts are made to safeguard emails, Zerum cannot guarantee that attachments are virus free or compatible with the recipient's systems and as such does not accept liability in respect of viruses or any computer problems experienced.

From: James Hughes <James.Hughes@manchester.gov.uk>
Sent: 21 December 2021 12:19
To: Nikki Sills <Nikki.Sills@zerum.co.uk>
Subject: Apex Tower

Hi Nikki,

I hope you are well and looking forward to the Christmas/NY break.

I have received another comment from Environmental Health on the above:

- Agreed that ground conditions are scoped out. It is understood a desk study will be submitted with the planning application and that a site investigation will be undertaken.
- Air Quality, Noise & Vibration have been scoped in, which is agreed. The proposed approach for undertaking the respective assessment reports is agreed. It is understood that there have already been discussions with the acoustician and monitoring locations have been agreed with them.

There were no other specific comments and we await submission of the planning application in time.

Thank you,
James

James Hughes
Planning Officer

Development Management City Centre
Planning Building Control and Licensing - Growth and Development
Manchester City Council

Tel: 0161 600 8772
Email: james.hughes@manchester.gov.uk
www.manchester.gov.uk

Location address: Manchester City Council Town Hall Extension Lloyd Street Manchester M2 5DB.
Postal Address: Manchester City Council P.O. Box 532 Town Hall Manchester M60 2LA

Working days over the Christmas/New Year period are as follows:

Friday 24 December 2021: Non-working Day
Monday 27 – Tuesday 28 December 2021: Bank Holidays
Wednesday 29 – Friday 31 December 2021: Working Days
Monday 03 January 2022 – Bank Holiday
Tuesday 04 January 2022 – Return to normal working pattern

This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed.
If you have received this email in error, please notify the system manager.
The full text of the Council's email disclaimer is available at www.manchester.gov.uk/emaildisclaimer.
Your personal data is very important to us. Please refer to our privacy notice at www.manchester.gov.uk/privacy for further information.

This footnote also confirms that this email message has been swept for the presence of computer viruses.
