



**MANCHESTER
CITY COUNCIL**

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Mr Cameron Radford
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30 September 2021

Our reference: JA/DMN

Dear Mr Radford

**TOWN AND COUNTRY PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT)
REGULATIONS 2017 ("THE EIA REGULATIONS")**

SCOPING REQUEST UNDER PART 4 REGULATION 15(1)

'TRINITY ISLANDS' MANCHESTER ("THE PROPOSED DEVELOPMENT")

**SCOPING OPINION OF MANCHESTER CITY COUNCIL PURSUANT TO
REGULATION 15**

Thank you for your request dated 13 August 2021 for a Scoping Opinion at the above site.

In coming to a formal opinion on the scope of the Environmental Statement ("ES"), Manchester City Council, as Local Planning Authority, has considered the supporting information contained within your *'Trinity Islands - Environmental Impact Assessment Screening and Scoping Report'* prepared by yourselves, on behalf of the Applicant Renaker Build Limited, and the comments from statutory consultees.

I have now had a chance to consider your scoping request and I outline my response below.

The Proposed Development is considered an EIA development as it falls within the description and thresholds in Schedule 2 10(b) of the EIA Regulations as an 'Infrastructure Project - Urban Development Project' which has the potential to have significant effects on the environment. In accordance with Schedule 2, Categories 10(b) (urban development projects) of the EIA Regulations and owing to the location, scale and nature of the Proposed Development, I note that you recognise the need for an EIA and have therefore submitted the Scoping Report for consideration to the City Council, as Local Planning Authority.

Before adopting a Scoping Opinion the City Council, as Local Planning Authority, must take into account the information specified in Regulation 15(6) of the EIA Regulations.

- (a) any information provided by the applicant about the proposed development;
- (b) the specific characteristics of the particular development;
- (c) the specific characteristics of development of the type concerned; and
- (d) the environmental features likely to be significantly affected by the development.

This Scoping Opinion sets out the information that the City Council, as Local Planning Authority, considers should be included in the ES that will be submitted with the subsequent planning application made in respect of the Proposed Development.

In formulating this Scoping Opinion the City Council, as Local Planning Authority, has taken account of, the requirements of the EIA Regulations, the nature and scale of the Proposed Development, the nature of the receiving environment, current best practice in the preparation of environmental statements, and the views expressed by the organisations and bodies that responded to the consultation.

This Scoping Opinion should not be construed as implying that the City Council, as Local Planning Authority, agrees with the conclusions set out in the Scoping Request regarding impacts of the proposal. This Scoping Opinion is without prejudice to any decisions subsequently taken in respect of any planning application submitted in respect of the Proposed Development.

Your report of the 13 August 2021 sets out the proposed chapters that the ES will cover, and the disciplines which you believe should be scoped in and out of the EIA.

These are as follows:

Scoped In

- Air Quality;
- Built Heritage;
- Climate Change;
- Daylight and sunlight;
- Flood Risk and Drainage;
- Noise and Vibration;
- Socio-economic;
- Solar Glare;
- Townscape and Visual Impact Assessment;
- Traffic and Transport; and
- Wind.

Scoped out

- Agricultural circumstances;

- Archaeology;
- Aviation;
- Ecology;
- Ground Conditions;
- Human Health; and
- TV Reception, FM Radio and DAB Radio Reception.

Below is a consideration of the Scoping Report for the Proposed Development and comments on the approach which you have outlined.

CONSULTATIONS

Regulation 15 (4) of the EIA Regulations require the City Council, as Local Planning Authority, to consult consultation bodies prior to adopting a Scoping Opinion.

Having regard to Regulation 2 of the EIA Regulations, the following consultees were consulted who have specific environmental responsibilities and which the City Council, as Local Planning Authority, considers are likely to have an interest in the development proposal.

- Natural England;
- Environment Agency;
- Greater Manchester Ecology Unit (GMEU);
- Greater Manchester Archaeology Advisory Service (GMAAS);
- Transport for Greater Manchester (TfGM);
- United Utilities;
- City Council Highway Services;
- City Council Environmental Health;
- City Council Flood Risk Management;
- City Council Arborist;
- City Council works and skills;
- Aerodrome Safeguarding;
- Canal and River Trust (CRT);
- Design for Security at Greater Manchester Police.

All responses of the consultees contacted by the City Council, as Local Planning Authority, during the EIA scoping process are appended to this letter.

You are strongly recommended to consult further with consultees as appropriate throughout the EIA process as the development proposal evolves. It is thereby recommended all consultee responses are reviewed by you and the applicant in full.

Any subsequent ES submitted with a planning application should reflect the points raised by the consultation bodies where this reflects the requirements of the Regulations. It is recommended that the ES summarises the scoping responses from the consultation bodies and how they are, or are not, addressed in this regard. Any consultation responses received after the date of this letter, that have not been taken into account within this Scoping Opinion, will be forwarded to you and should be given due consideration in the planning application and EIA process.

CONTEXT

The development site is approximately 1.78 hectares and is located within the St John's and Water Street Strategic Regeneration Framework Areas. The site is bounded by the River Irwell to the north and west, Liverpool Road to the east and Water Street and Regent Road to the south.

The site is split into two parcels of land known as site C and site D which are currently used for car parking.

Site C is approximately 0.89 hectares and is bounded by the River Irwell to the north, Trinity Wat to the west, Water Street to the south and the railway viaduct to the east. Pedestrian and vehicular access is located on the southern boundary of the site. There is a slope to the topography of the site in a downwards direction to the north of the site towards the River Irwell. There is limited vegetation to this boundary.

Site D is approximately 0.89 hectares and is bounded by the River Irwell to the north and west, Regent Road to the south and Trinity Way to the east. Pedestrian and vehicular access to the site is via Trinity Way on the eastern boundary. There is a slope to the topography of the site in a north and west direction towards the River Irwell. There is limited vegetation along this boundary.

SENSITIVE RECEPTORS

The development site is located within the Greater Manchester Combined Air Quality Management Area (AQMA) due to its proximity to major roads within the City Centre.

The site is not within, nor does it contain, any ecological designations including sites of specific interest (SSSI), sites of biological importance (SB1) or special protection areas (SPA). The closest special area of conservation (SAC) and sites of special scientific interest (SSSI) is the Rochdale Canal SSSI and SAC which lies approximately 6.9 km North East of the development site.

The site is partially in Flood Zone 1 (located furthest away from the River Irwell) and are defined as having a less than 1 in 1,000 annual probability of river or sea flooding. The remainder of the site, closest to the River Irwell, is located within Flood Zone 3 which is defined as land having between a 1 in 100 and 1 in 1,000 annual probability of river flooding; or land having between a 1 in 200 and 1 in 1,000 annual probability of sea flooding.

The site is also situated within the Manchester, Salford and Trafford Critical Drainage Area (CDA).

The development site is located within the Castlefield Conservation Area. There are also a number of listed buildings within 250 metres of the site which are as follows: Railway Bridge Over River Irwell To Former Liverpool Road Station Grade I, Railway Bridge Over River Irwell To Former Liverpool Road Station (Grade I), The Giants Basin (Grade II), Railway Bridge Over River Irwell To Former Liverpool Road Station (Grade

I), Colonnaded Railway Viaduct at Former Liverpool Road Goods Depot (Grade II), Former Grape Street railway bonded warehouse (Grade II), Bridgewater Canal Basin at Potato Wharf (Grade II), Old Warehouse to North of Former Liverpool Road Railway Station (Grade I), Former Commercial Hotel (Grade II), Railway Viaduct Linking Bridge Over Irwell To Liverpool Road Station (Grade II), 123, Liverpool Road (Grade II) and Former Liverpool Road Railway Station Masters House (Grade I).

High-rise residential development comprised of four residential buildings, together with public realm, are located along the riverside and the Trinity Bridge Way immediately to the east.

A mixture of uses are located south of the site. Immediately across Water Street on the southern boundary is a large Big Yellow self-storage facility as well as a number of light industrial warehouses. Further south lies the medium-rise residential development Potato Wharf as well as a mixture of additional small-scale residential, retail and leisure uses surrounding the Bridgewater Canal.

To the south east of the Site and along the River Irwell is a mixture of residential and commercial uses. The residential uses comprise One Regent and the Vie Building. A large format retail store, Porcelenosa, is immediately adjacent to One Regent as well as 183 Water Street residences.

PROPOSED DEVELOPMENT

I note from your Scoping Report that the Proposed Development is based on a number of parameters which are evolving as part of the design process. Should these parameters change, then a further scoping assessment should be undertaken if the scope of the ES needs to reflect this.

The Proposed Development for Trinity Islands would consist of the construction of approximately 2000 new homes and up to 9,000 sq. ft of retail, commercial and leisure uses (Use Classes E [a,b,d] and Sui Generis) within four residential towers.

The tower heights are as follows:

C1: 35 storeys to 39 storeys

C2: 44 storeys to 48 storeys

D1: 56 storeys to 60 storeys

D2: 51 storeys to 55 storeys

I also note it is envisaged that underground car parking (between 550 and 750 spaces of which 10% would be fitted with an electric charging point), 100% cycle provision together with 1.3 hectares of open space including new public realm space at ground and riverside level.

ASSESSMENT OF THE SCOPING REPORT

I can confirm that the approach outlined within the Scoping Report is considered to be generally acceptable, appropriate and proportionate. This is also reflected in the nature of the consultation responses.

You should note the specific points I have made below within the specific discipline areas which reflect the comments of the consultees and those of the City Council, as Local Planning Authority. These matters should also be included and addressed within the relevant chapters of ES.

Discussion of alternatives

Paragraph (3)(d) of Regulation 18, and paragraph 2 of Schedule 4 of the EIA Regulations, require that environmental statements include discussion description of the reasonable alternatives to the Proposed Development and an indication of the main reasons for the option chosen, that have been considered by the applicant.

I note within section 3 of your Scoping Request that you intend to provide a discussion on alternatives within the ES. This will focus on alternatives considered and project design evolution

Presentation and content of the Environmental Statement

The purpose of an ES is to enable significant environmental impacts of a proposed development to be fully considered before an application for planning consent is determined.

The ES provides environmental information to aid the decision making process. The ES should be laid out clearly, with minimum use of technical terms (where appropriate) and should provide an objective and realistic description of the likely significant impacts of the proposed development.

The information should be presented so as to be comprehensible to the specialist and non-specialist alike. The ES should be concise with supporting technical information placed in appendices

Mitigation

Paragraph 7 of Schedule 4 of the EIA Regulations states that mitigation measures may fall into a range of categories namely:

- avoidance of impacts;
- reduction in the magnitude of impacts; or
- compensation for losses incurred through unavoidable impacts;

These should identified as such in the technical chapters of the ES.

Mitigation measures should not be developed in isolation, as they may relate to more than one aspect of the environment (e.g. mitigation to address issues of landscaping, surface water management, air quality and biodiversity).

The ES should set out the mitigation measures required to prevent, reduce and where possible offset any significant adverse effects. The ES should also identify any residual effects that could be expected to persist even with mitigation in place.

The anticipated effectiveness of any mitigation measures proposed should be addressed within the ES. Only mitigation measures that can be shown to be deliverable (i.e. technically and financially viable), and for which the applicant can deliver and implement as part of any planning permission granted, should be taken into account as part of the assessment.

It is further recommended that a section is included in the ES in which the mitigation measures proposed across all the technical chapters are collated, and presented as an integrated package.

It is considered best practice to outline in the ES, the structure of the environmental management and monitoring plan.

Cumulative effects

The committed developments summarised in Appendix 2 appears to be acceptable.

Cross references and summarising of the findings

All specialist chapters should be cross-referenced to other relevant disciplines (for example traffic impacts on air quality). Consideration of the potential for interactions between the different aspects of the environment is essential to the production of a robust assessment.

The ES should not be a collection of separate specialist chapters, but a comprehensive assessment of the environmental impacts of the proposed components of the wider scheme, and should account for how the identified impacts could be mitigated or avoided, or how suitable compensation could be provided to offset those effects.

In accordance with the requirements of paragraph 6 of Schedule 4 of the EIA Regulations, each technical chapter should include a description of the forecasting methods or evidence, used to identify and assess the significant effects on the environment, including details of any difficulties (e.g. technical deficiencies, lack of know-how, etc.) encountered by the applicant during the preparation of the ES and the main uncertainties involved.

ENVIRONMENTAL MATTERS TO BE SCOPED OUT OF THE ES

The City Council comments as follows, based on the information provided, on the matters proposed to be scoped out of the ES.

Agricultural circumstances

The Scoping Report states the site is on brownfield land in an urban environment. There will be no likely significant effects on agriculture and therefore can be scoped out of the EIA.

Archaeology

The Scoping Report concludes that although there is evidence of industrial remains relating to late 18th Century dye works, an early 19th century warehouse and associated smithy together with potential Roman remains, this would be of local to regional significance only and unlikely to be of national significance. Accordingly, Archaeological can be scope out of the ES on the basis that a detailed archaeological desk based assessment is submitted with the planning application.

Aviation

The Scoping Report acknowledges that the proposed development would exceed the 90 AOD aviation safeguarding threshold and that consultation would be required with Manchester Airport Group (MAG), Barton Aerodrome and NATS. I concur with your conclusion that aviation would not result in any likely significant impacts that would warrant consideration by an EIA and can therefore be scoped out of the ES provided that appropriate consultation takes place.

Ecology

The impact on ecology is considered to be of no more than local significance. The protected species interest in the development site is low with the main impacts being the loss of vegetation and habitats. I accept that an ecological assessment is capable of being scoped out of the ES and can instead form part of the supporting documents to the planning application and should include measure to improve the nature conservation value of the this urban area adjacent to the River Irwell including biodiversity net gain.

Ground Conditions

The Scoping Report concludes that although there is evidence of previous contamination, there is nothing unusual or complex about the ground conditions at the proposed development site. As a result, there will be no significant effects which would require consideration by an EIA. I confirm that ground conditions can be scoped out of the ES provided the planning application is supported by an appropriate report which supports these conclusions.

Human Health

I consider Human Health cannot be scoped out of the ES for the reasons set out below.

TV Reception, FM Radio and DAB Radio Reception

The Scoping Report concludes that the proposed development may have the potential to impact TV reception but that these are unlikely to be of more than local significance and can be mitigated. I can confirm that TV Reception, FM Radio and DAB Radio Reception can be scoped out of the ES provided that the planning application is supported by an appropriate report which supports these conclusions.

Summary

I agree that some of the matters you have identified to be scoped out of the ES are appropriate. I am of the opinion, however, that Human Health (further details provided below) should be part of the ES.

The planning application must be supported by appropriate documentation, including any mitigation, to minimise any effects as a result of the Proposed Development from the matters capable of being scoped out. The City Council reserves the right to reconsider this position following a more detailed consideration of the reports which will accompany the planning application.

ENVIRONMENTAL STATEMENT CHAPTERS - SPECIFIC COMMENTS ON THE TECHNICAL CONTENTS

The ES should be proportionate in its consideration of the aspects of the environment listed under Paragraph 2 of Regulation 4 of the EIA Regulations. Those aspects of the environment that are subject to the most significant impacts from the Proposed Development should be the primary focus of the ES.

Your Scoping Report advises that the ES will cover the following topic areas.

- Air Quality;
- Built Heritage;

- Climate Change;
- Daylight and sunlight;
- Flood Risk and Drainage;
- Noise and Vibration;
- Socio-economic;
- Solar Glare;
- Townscape and Visual Impact Assessment;
- Traffic and Transport; and
- Wind.

As highlighted above, you should also include Human Health within relevant chapters within the ES.

General Comments

For planning purposes, the development site is located in a Strategic Housing Location (policy H2) of the Manchester Core Strategy (2012) together with forming a key component of the St John's and Water Street Strategic Regeneration Framework Areas.

The significance of the site should be reflected throughout the ES. The Environmental Chapters must therefore consider the impacts of the Proposed Development on this context in order to determine any wider significant environmental impacts.

Air Quality

The comments within your Scoping Report are noted and are broadly acceptable in terms of their consideration in the ES.

The City Council, as Local Planning Authority, recommends that the ES must take account of the following additional matters with reference to impacts on air quality.

Mitigation measures will need to be included in the assessment for the control of fugitive dust emission during the enabling and construction phase and also details of any mitigation measures to protect the future occupiers from poor air quality such as clean air filters.

The location on the building of the clean air intake will need to be recommended, details of the filters to be installed and a section on filter maintenance including frequency of inspection, maintenance and replacement along with details of how the maintenance requirements will be managed by the exiting or future building management companies should the building be sold or should the management company change.

Reference and compliance to the IAQM best practice principles should be included in the report and details of how these will be complied with.

The proposals for the EV charging facilities will need to be amended to reflect the MCC EVCP requirements as outlined below:

Residential:

- On-site/allocated parking: 1 EV charge point (minimum 7kW) for each dwelling;
- Unallocated parking: minimum 25% EV (minimum 7kW) charge points, and cable routes for all other spaces.

Commercial:

- 10 or less parking spaces: minimum 1 EV charge point, and cable routes for all other spaces;
- 11 or more parking spaces: minimum 25% EV charge points, and cable routes for all other spaces;
- Charging units dependent on end-use as follows:
 - o Minimum 7kW: offices, hotels, nursing homes, sheltered accommodation, industrial units, retail units.

Built Heritage

The comments within your Scoping Report are noted and are acceptable in terms of their consideration in the ES.

Climate Change

The comments within your Scoping Report are noted and are acceptable in terms of their consideration in the ES.

Daylight and sunlight

The comments within your Scoping Report are noted and are acceptable in terms of their consideration in the ES.

Flood Risk and Drainage

It is considered that the flood risk and drainage impacts of the Proposed Development are significant and require assessment through the EIA process.

The City Council, as Local Planning Authority, recommends that the ES provides the following information in respect of flood risk and drainage within a chapter of the ES.

Proposed finished floor levels and flood mitigation measures should be in accordance with the government standing advice.

The site is generally at a very low risk of surface water flooding. The Flood Map for Surface Water can be viewed at: <http://maps.environment-agency.gov.uk/>.

The proposed development is within an area at low susceptibility to groundwater flooding.

Whilst the City Council does not hold any recorded incidents of flooding within the site or close vicinity, surface water management for the site needs to follow the drainage hierarchy:

- Infiltration into ground
- Connection to the watercourse
- Connection to discharge water sewer and as a last resort;

- Connection to the combined sewer.

Presence of Made Ground on site could be suspected. However, site investigation and percolation tests in line with BRE 365 Digest should be undertaken to assess feasibility of Infiltration into ground as a method for surface water disposal.

The Grey Irwell runs along the Western boundary of the site and if infiltration on site is not possible, the next discharging point for surface water should be this watercourse, where feasible.

If surface water is to discharge to the Grey Irwell, then outfall details and proposed discharge rates should be agreed in principle with Peel Holdings.

If outfall into the Grey Irwell is proposed assessment of the impact of the flows into the River Irwell is required including consideration of the velocity and gradient constraints and the impact of high flows within the River Irwell on the proposed drainage network.

The use of pollution control measures for surface water discharge should be assessed and considered where appropriate.

If surface water is to be discharged into a United Utilities sewer this should be agreed in principle with them.

The Government has strengthened planning policy on the provision of sustainable drainage systems (SuDS) for 'major' planning applications which was introduced on 6 April 2015 (Paragraph 103 of National Planning Policy Framework and Ministerial Statement on SuDS). As per the guidance issued by the Department of Communities and Local Government (DCLG), all 'major' planning applications being determined from 6 April 2015, must consider sustainable drainage systems.

SuDS should be designed to control surface water as close to its source as possible. Well designed

sustainable drainage systems also provide opportunities to:

- reduce the causes and impacts of flooding,
- remove pollutants from urban run-off at source,
- combine water management with green space with benefits for amenity, recreation and wildlife.

The Council is encouraging use of green roofs, green walls, tree planting and other forms of green infrastructure to allow for the adaptation to climate change in heavily urbanised area. New Green infrastructure provision should be an exemplar of best practice and innovation in terms of both its design and management. Greater Manchester is the first city-region in the UK to develop a Natural Capital Investment Plan designed to encourage investments in natural capital that deliver financial as well as social returns.

The use of SuDS should also help achieve the sustainability objectives of the National Planning Policy Framework (NPPF).

The suitability of sustainable drainage systems should be assessed in accordance with paragraphs 051, 079 and 080 of the revised NPPF Planning Practice Guidance for Flood Risk and Coastal Change (<http://planningguidance.planningportal.gov.uk/blog/guidance/flood-risk-and-coastal-change/>).

Sustainable drainage systems should be designed in line with national Non-Statutory Technical Standards for SuDS (https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/415773/sustainable-drainage-technical-standards.pdf) and local policies EN08, EN09, EN14, EN15 and EN17 of the Core Strategy.

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 run off should be provided through SUDS as part of any brownfield development with the aim of reducing to the Greenfield run off rates.

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

Hydraulic calculations and drawings to support the design need to be provided along with proposed standards of operation and maintenance in accordance with paragraph 081 of NPPF Planning Practice Guidance.

Management and maintenance plan for the lifetime of the development which shall include the arrangements for adoption by any public body or statutory undertaker, or any other arrangements to secure the operation of the sustainable drainage scheme throughout its lifetime shall be submitted.

Noise and Vibration

The comments within your Scoping Report are noted and are broadly acceptable in terms of their consideration in the ES.

The City Council, as Local Planning Authority, recommends that the ES must take account of the following additional matters with reference to impacts on noise and vibration.

Data is to be obtained from previous noise studies due to the pandemic but this will need to be supported by more up to date assessment as the background noise levels return to more normal conditions in order to inform the design of the building. I understand that this approach has already been discussed and agreed with your acoustic consultant.

Noise ingress to the residential buildings needs to be included (this doesn't seem to be mentioned in the table of assessment) from road traffic noise, external noise factors and also from the proposed ground floor uses of the new developments / towers.

Consideration to the location of risers within the development for building services and lift shafts so they are ideally not travelling next to habitable rooms and details of the acoustic insulation scheme of these areas will be required. Similarly, how will any structurally adjoining components such as pillars will be insulated to prevent sound transfer into the residential apartments.

It is likely that a scheme of mechanical ventilation will be required as the internal noise criteria is unlikely to be met with windows open in this location. Details of the mechanical ventilation scheme will need to be provided and the facade assessment and recommendations will need to consider insulation of any penetrations to the façade for service intakes or extract for any ventilation scheme. The ventilation system will

need to be selected and controlled to ensure the internal noise criteria will not be exceeded when in operation (including during any boost mode / function if applicable).

The potential for overheating should also be assessed and the noise insulation scheme should take this into account. The approved noise insulation and ventilation scheme shall be completed before any of the dwelling units are occupied.

Noise break from plant will also need to consider noise from fans for extraction which are located behind louvres such as the basement carpark extract fans.

Noise and vibration levels during enabling and construction phase will need to be assessed and maximum limits at the site boundary will need to be recommended. Details of continual monitoring of noise and vibration will need to be included. These requirements once agreed will need also to be included within the CMP.

Noise from any external areas associated with the developments will need to be included and the applicant should be aware we won't be supporting any music or speakers in any external areas.

In respect of construction activities, this should include the identification of the noisiest activities and who the work may impact, duration of these activities, site wide noise and vibration mitigation measures with reference to BPM to be adopted on site specifically for the noisier or more intrusive activities, the maximum site noise level and vibration levels at the site boundary particularly during the noisier activities, details of monitoring, details of machinery and equipment to be used and their expected noise levels, details of what action is taken where the maximum site noise and/or vibration levels (one agreed) are approached or breached.

Socio-Economic Impacts

The comments within your Scoping Report are noted and are acceptable in terms of their consideration in the ES.

Solar Glare

The comments within your Scoping Report are noted and are acceptable in terms of their consideration in the ES.

Townscape and Visual Impact Assessment

The comments within your Scoping Report are noted and are acceptable in terms of their consideration in the ES. It is noted that the final views for assessment have not yet been confirmed and therefore I reserve the right to comment on these at a later stage.

Traffic and Transport

The comments within your Scoping Report are noted and are broadly acceptable in terms of their consideration in the ES.

The City Council, as Local Planning Authority, recommends that the ES must take account of the following additional matters with reference traffic and transport.

The Scoping Report indicates that detailed modelling and safety assessments will be undertaken for the junctions of Trinity Way/Regent Road and for Trinity Way/Water Street. Mitigation measures to improve connectivity between these areas and the city

centre should be considered, in particular the importance of Water Street as a key route which should be improved for cyclists and pedestrians.

As reflected in the air quality section, the provision of electric car charging points should be reconsidered with a minimum of 20% provision being made available on site for the residential element of the scheme with the remainder fitted with the infrastructure required to make conversion easier at a later stage.

A review of the number of disabled parking bays is required along with provision of car club provision.

Wind

The comments within your Scoping Report are noted and are acceptable in terms of their consideration in the ES.

Human Health

It is considered that the human health impacts of the Proposed Development are significant and require assessment through the EIA process.

Matters of air quality, transport and traffic, flood risk, noise and vibrations and socio-economic effects have all been scoped into the ES due to these disciplines having significant environmental impacts. All of these matters affect Human Health and therefore the Proposed Development is likely to give rise to significant environmental impacts on the Human Health which should be considered and evaluated through the ES.

This should include an assessment of the impact on human health with regards to any air quality considerations, climate change and quality of life, particularly during the construction process when heavy plant, machinery, dust and emissions are likely to be generated together with any noise, disturbance, traffic/transport and air quality considerations during the operational phases of the development.

FURTHER INFORMATION

The City Council, as Local Planning Authority, has undertaken a thorough consideration of the information contained within your Scoping Report together with providing comments from relevant statutory consultees. The issuing of this Scoping Opinion does not preclude the City Council, as Local Planning Authority, from requesting further information at a later stage as the development proposals evolve or whilst a future planning application is being formally considered.

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

Yours sincerely



Dave Roscoe

Deputy Director of Planning

CONSULTATION RESPONSE: EIA Scoping Opinion Request - Trinity Islands

Diane Jackson <Diane.Jackson@magairports.com>

Tue 31/08/2021 13:14

To: Jennifer Atkinson <jennifer.atkinson@manchester.gov.uk>

Hi Jennifer,

Thank you for consulting us on the EIA SO for Trinity Islands. We are content that the Screening and Scoping document has identified the need to consult with MAG & NATS due to the height of the development; we have nothing further to add at this point.

3.15 At up to 60 storeys the Proposed Development exceeds the 90 AOD aviation safeguarding threshold. Manchester Airport Group (MAG), Barton Aerodrome and NATS will need to be contacted for consultation advice.

We look forward to the full consultation in due course.

Kind Regards,

Diane

Diane Jackson
Group Aerodrome Safeguarding Officer

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Manchester City Council
PO Box 532
Town Hall
Manchester
M60 2LA

Your Ref No ref
Our Ref CRTR-PLAN-2021-33722
Thursday 2 September 2021

Dear Ms Atkinson

Proposal: Request for Scoping Opinion for the construction of four new residential towers of between circa 35 and 60 storeys to provide up to 2,000 apartments with retail, commercial and leisure uses on the lower levels and underground parking spaces. (It should be noted that the proposed figures are not fixed and are part of an evolving design.)

Location: Trinity Islands, Land at west of Liverpool Road and north of Water Street / Regent Street, , Manchester

Waterway: Manchester Bolton & Bury Canal

Thank you for your consultation.

We are the charity who look after and bring to life 2000 miles of canals & rivers. Our waterways contribute to the health and wellbeing of local communities and economies, creating attractive and connected places to live, work, volunteer and spend leisure time. These historic, natural and cultural assets form part of the strategic and local green-blue infrastructure network, linking urban and rural communities as well as habitats. By caring for our waterways and promoting their use we believe we can improve the wellbeing of our nation. The Trust is a statutory consultee in the Development Management process.

Based on the information available our substantive response (as required by Article 15 of the Town & Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended)) is the following general advice:

Although, the Trinity Islands scheme is located further to the south of the Canal, we consider that the Environmental Statement should consider the following:

Site Context and Site Description

It is considered that recognition should be given to the restored stretch of the Manchester Bolton and Bury stretch of Canal and its connection with the River Irwell in proximity to the site.

Ecological considerations

We welcome that both the Rochdale Canal SSSI and Ashton Canal Site of Biological Importance (SBI) have been included within the list of Ecological designations. We would ask that the impact upon these are assessed accordingly as part of the Environmental Statement.

Canal & River Trust

Fradley Junction, Alrewas, Burton-upon-Trent, Staffordshire DE13 7DN
T 0303 040 4040 **E** canalrivertrust.org.uk/contact-us **W** canalrivertrust.org.uk

Townscape and Visual Impact

We recommend that both the waterways and waterway users be identified as receptors. This will enable appropriate location(s) for a river/canal viewpoint be selected to allow the potential impacts to be properly assessed, including impacts on the canal link to the restored section of the Manchester Bolton and Bury Canal.

Built Heritage

The identification of all potential receptors (heritage assets) to be affected by the proposal is welcomed and it is important that the waterways' history and significance are recognised and dealt with accordingly.

Daylight, Sunlight and Overshadowing

It is requested that the waterways and waterway users be identified as receptors to be considered as part of this assessment.

Please do not hesitate to contact me with any queries you may have.

Yours sincerely,

Tim Bettany-Simmons MRTPI
Area Planner

Tim.Bettany-Simmons@canalrivertrust.org.uk
07342 057926

<https://canalrivertrust.org.uk/specialist-teams/planning-and-design>

Canal & River Trust

Fradley Junction, Alrewas, Burton-upon-Trent, Staffordshire DE13 7DN
T 0303 040 4040 **E** canalrivertrust.org.uk/contact-us **W** canalrivertrust.org.uk

Manchester City Council
Town Hall Albert Square
Manchester
Lancashire
M2 5DB

Our ref: SO/2021/121491/01-L01
Your ref: Trinity Island EIA Scoping
Date: 25 August 2021

FAO: Jennifer Atkinson

Dear Madam

THE TOWN AND COUNTRY PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2017 (AS MENDED) - REQUEST FOR ENVIRONMENTAL IMPACT ASSESSMENT (EIA) SCOPING OPINION

TRINTY ISLANDS – MULTI-PLOT (SITE C & D), MIXED USE DEVELOPMENT (1.78ha) USE CLASSES C, E AND SUI GENERIS

LAND BOUNDED BY THE RIVER IRWELL TO THE NORTH & WEST, WATER STREET TO THE EAST AND THE A6402 & A57 TO THE SOUTH, MANCHESTER

Thank you for requesting an EIA scoping opinion from the Environment Agency (EA) for the development proposal outlined above. Referral for this scoping opinion request was received on the 24th August 2021.

In order to provide our scoping opinion below we have reviewed the following submitted report:

- Environmental Impact Assessment (EIA) Screening and Scoping Report – Trinity Islands. Prepared by Deloitte. August 2021.

Environment Agency Position

Having reviewed the EIA scoping report detailed above, we acknowledge and agree with the determination reached within the report that the development proposal will meet the criteria of a 'Schedule 2 Development' as detailed under The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 and subsequently, the intention of the applicant/consultation team to prepare an Environment Statement (ES) to support the subsequent planning application.

Having reviewed the scope of the proposed ES, we are satisfied that environmental issues of focus and within the planning remit of the EA will be addressed as part of ES or, where scoped out of the ES, will form separate reporting submissions for the planning application.

Environment Agency- Additional Commentary

To assist with the preparation of the ES and other reporting associated with the development proposal, we would to take this opportunity to provide the additional commentary and advice detailed below. Where possible we have tried to group our commentary to the relevant sub-headings of the Deloitte report for ease of reference.

Ecology (Section 3.17 – 3.23)

We acknowledge the determination by the consultant to scope out ecology from the ES. However, note that the Phase 1 Habitat and Invasive Plant survey has identified the presence of the invasive plant species Giant Hogweed and Indian Balsam. We would advise that for the purpose of treating these invasive species that a suitable management plan is prepared.

The use of herbicides in the vicinity of a waterbody should be treated with caution and may require consent. For further guidance on this matter please refer to the following information sources:

- <https://www.gov.uk/government/publications/application-to-use-herbicides-in-or-near-water>
- <https://secure.pesticides.gov.uk/pestreg/>

Ground Conditions (Section 3.24- 3.29)

We acknowledge the determination by the consultant to scope out ground conditions from the ES. However, we note and welcome the intention to provide (further to the Phase 1 desk study detailed under Appendix 5) a further Phase 2 intrusive investigation report alongside the forthcoming planning application.

It should be noted that the EA has already undertaken a review of the Phase 1 Report provided under Appendix 5 as part of formal consultation on previous planning application 115107/FO/2017, in which we recommend several conditions regarding the requirement for further intrusive site investigation and caution against use of the use of infiltration drainage technologies.

For ease of reference, extract from our contaminated land officer's previous commentary on the Phase 1 Desk Study is provided below:

- Phase 1 Desktop Study on Trinity Islands, Manchester, RoC consulting, June 2015, Rev E 27/02/2017.

"The site has been subject to past industrial land use which has the potential to have resulted in contamination being present on the site.

The site is located adjacent to the River Irwell and geological mapping shows drift to be absent beneath the site. There is the potential for alluvium from the adjacent river channel to be present and this would be classified as Secondary A aquifer. The bedrock in this location is Chester Pebble Beds sandstone which is classified as a Principle aquifer.

The nearest groundwater abstraction is 725m northwest of the site.

The desk study report identifies risks to the River Irwell and the underlying Principal aquifer and recommends Phase 2 intrusive site investigation including groundwater sampling. I agree with this recommendation.

The previous use of the proposed development site as various industrial uses including chemical work presents a high risk of contamination that could be mobilised during construction to pollute controlled waters. Controlled waters are particularly sensitive in this location because the proposed development site:

- is located upon Principal aquifer
- is adjacent to the River Irwell

The Phase 1 Desktop Study on Trinity Islands, Manchester, RoC consulting, June 2015, Rev E 27/02/2017, submitted in support of this planning application provides us with confidence that it will be possible to suitably manage the risk posed to controlled waters by this development. Further detailed information will however be required before built development is undertaken”

Flood Risk (Section 5.168 – 5.1.193)

We acknowledge that flood risk has been scoped into the forth coming ES and note the intention of the applicant/consultant to seek scope and guidance from the EA (section 5.188). Detailed planning advice and guidance can be provided as part of chargeable planning advice service, see letter sub-section below.

We do not prepare or provide FRAs. However, our Customers and Engagement teams can provide any relevant flood risk information that we have available. Please email InfoRequests.GMMC@environment-agency.gov.uk for any information requests.

Further advice on what to include in a Flood Risk Assessment (FRA) can be found at <https://www.gov.uk/guidance/flood-risk-and-coastal-change#site-specific-flood-risk-assessment-all>

EA Chargeable Planning Advice Service

Should you wish us to review any technical documents or want further advice to address the environmental matters associated with the proposed development, we may do this as part of our charged for planning advice service.

Further engagement via the service will provide you with the opportunity to discuss and gain our views on potential options, before formally submitting information as part of your planning application. It should also result in a better quality and more environmentally sensitive development.

As part of our charged for service we will provide a dedicated project manager to act as a single point of contact to help resolve any problems. We currently charge £100 per hour, plus VAT. We will provide you with an estimated cost for any further discussions or review of documents. The standard terms of our charged for service are available [here](#).

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Please forward a copy of the additional commentary section of the letter detailed above to the applicant / agent. Should you have any queries regarding this response, then please do not hesitate to contact me.

Yours faithfully

Mr Andy Davies
Sustainable Places Advisor

Direct e-mail andy.davies1@environment-agency.gov.uk

End

EIA Scoping Opinion Request - Trinity Islands - Ecology Unit Response

Derek Richardson <derek.richardson@tameside.gov.uk>

Wed 25/08/2021 09:00

To: Jennifer Atkinson <jennifer.atkinson@manchester.gov.uk>

Dear Jen

Thank you for consulting the Ecology Unit on the above EIA Scoping Opinion Request.

I would accept the findings of the initial ecology surveys which have been carried out for the site that the area has limited nature conservation value. I would not consider that any further ecology surveys (other than those already described in the Screening and Scoping report provided by Deloitte) are required to inform an EIA.

The site is adjacent to the River Irwell, a valuable wildlife corridor through the city centre, and there is potential to improve the nature conservation of this very urban area during the development of this site. The NPPF, City Council policies and emerging government policies and statutes all strongly encourage the delivery of biodiversity net gain through development. I would recommend that the developers are encouraged to take this into account at each stage of the development.

Yours sincerely
Derek Richardson

Derek Richardson
Principal Ecologist

Planning
Planning and Transportation
Growth

[Tameside MBC](#) | [Twitter](#) | [Facebook](#) | [Instagram](#)

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FW: EIA Scoping Opinion Request - Trinity Islands

Graeme Souter <graeme.souter@manchester.gov.uk>

Mon 13/09/2021 12:02

To: Jennifer Atkinson <jennifer.atkinson@manchester.gov.uk>

 1 attachments

Trinity Islands - Screening and Scoping_FINAL.pdf;

Hi Jen

I have reviewed the above scoping opinion and I have the following comments.

Air Quality

I can accept the majority of the proposals in the Air Quality chapter.

1. Mitigation measures will need to be included in the assessment for the control of fugitive dust emission during the enabling and construction phase and also details of any mitigation measures to protect the future occupiers from poor air quality such as clean air filters.
2. The location on the building of the clean air intake will need to be recommended, details of the filters to be installed and a section on filter maintenance including frequency of inspection, maintenance and replacement along with details of how the maintenance requirements will be managed by the exiting or future building management companies should the building be sold or should the management company change
3. Reference and compliance to the IAQM best practice principles should be included in the report and details of how these will be complied with.
4. The proposals for the EV charging facilities will need to be amended to reflect the MCC EVCP requirements as outlined below:

- Residential:
 - On-site/allocated parking: 1 EV charge point (minimum 7kW) for each dwelling.
 - Unallocated parking: minimum 25% EV (minimum 7kW) charge points, and cable routes for all other spaces.
- Commercial:
 - 10 or less parking spaces: minimum 1 EV charge point, and cable routes for all other spaces.
 - 11 or more parking spaces: minimum 25% EV charge points, and cable routes for all other spaces.
 - Charging units dependent on end-use as follows:
 - Minimum 7kW: offices, hotels, nursing homes, sheltered accommodation, industrial units, retail units.

Contaminated Land

I can accept the comments in the chapter. The phase I and phase II assessment will need to be submitted with the application which will be assessed at application stage.

Noise and Vibration

I can accept the comments in the chapter and have the additional comments below:

1. Data is to be obtained from previous noise studies due to the pandemic but this will need to be supported by more up to date assessment as the background noise levels return to more normal conditions in order to inform the design of the building. This approach has already been discussed and agreed with the acoustic consultant.

2. Noise ingress to the residential buildings needs to be included (this doesn't seem to be mentioned in the table of assessment) from road traffic noise, external noise factors and also from the proposed ground floor uses of the new developments / towers.
3. Consideration to the location of risers within the development for building services and lift shafts so they are ideally not travelling next to habitable rooms and details of the acoustic insulation scheme of these areas will be required. Similarly, how will any structurally adjoining components such as pillars will be insulated to prevent sound transfer into the residential apartments.
4. It is likely that a scheme of mechanical ventilation will be required as the internal noise criteria is unlikely to be met with windows open in this location. Details of the mechanical ventilation scheme will need to be provided and the facade assessment and recommendations will need to consider insulation of any penetrations to the facade for service intakes or extract for any ventilation scheme. The ventilation system will need to be selected and controlled to ensure the internal noise criteria will not be exceeded when in operation (including during any boost mode / function if applicable)
5. The potential for overheating should also be assessed and the noise insulation scheme should take this into account. The approved noise insulation and ventilation scheme shall be completed before any of the dwelling units are occupied.
6. Noise break from plant will also need to consider noise from fans for extraction which are located behind louvres such as the basement carpark extract fans
7. Noise and vibration levels during enabling and construction phase will need to be assessed and maximum limits at the site boundary will need to be recommended. Details of continual monitoring of noise and vibration will need to be included. These requirements once agreed will need also to be included within the CMP.
8. Noise from any external areas associated with the developments will need to be included and the applicant should be aware we won't be supporting any music or speakers in any external areas

In addition to the above, the applicant should be aware that the following matters will need to be addressed with the application:

Refuse – The development shall comply with the requirements to the MCC guidance document GD04

Hours – The hours for the retail units will need to be agreed

Fume - A scheme for the control of fumes, smoke and odours from any kitchen extract system will need to be submitted which should include risk assessments for odour and noise and be based on appropriate guidance such as that published by EMAQ titled 'Control of Odour and Noise from Commercial Kitchen Exhaust Systems' dated September 2018

CMP – The construction management plan should include a section on each of the following

- i) **Dust emission control**, these measures should be recommended in the AQ report and will need to be included directly within the CMP
- ii) **Noise and vibration**. This should include the identification of the noisiest activities and who the work may impact, duration of these activities, site wide noise and vibration mitigation measures with reference to BPM to be adopted on site specifically for the noisier or more intrusive activities, the maximum site noise level and vibration levels at the site boundary particularly during the noisier activities, details of monitoring, details of machinery and equipment to be used and their expected noise levels, details of what action is taken where the maximum site noise and / or vibration levels (once agreed) are approached or breached
- iii) Hours - not to exceed 07:30 to 18:00 Monday to Friday and 08:30 to 14:00 Saturday with no work on Sunday or Bank Holiday
- iv) Neighbour and stakeholder consultation
- v) Contractors complaints procedure

*There may be other conditions to be recommended once the application has been received and assessed such as restriction on hours for servicing / deliveries to commercial premises for example

Kind regards

Graeme

The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended) (the “EIA” Regulations) - Request for Scoping Opinion: Trinity Islands

(Flood Risk Management response – 2nd September 2021)

The proposed development is situated within Flood Zone 1 & 2. The Flood Map for Rivers and Sea can be viewed at: <http://maps.environment-agency.gov.uk/>.

Proposed finished floor levels and flood mitigation measures should be in accordance with the government standing advice.

The site is generally at a very low risk of surface water flooding. The Flood Map for Surface Water can be viewed at: <http://maps.environment-agency.gov.uk/>.

The proposed development is within an area at low susceptibility to groundwater flooding.

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

. Surface water management for the site needs to follow the drainage hierarchy:

- Infiltration into ground
- Connection to the watercourse
- Connection to discharge water sewer and as a last resort;
- Connection to the combined sewer.

Presence of Made Ground on site could be suspected. However, site investigation and percolation tests in line with BRE 365 Digest should be undertaken to assess feasibility of infiltration into ground as a method for surface water disposal.

The Grey Irwell runs along the Western boundary of the site and if infiltration on site is not possible, the next discharging point for surface water should be this watercourse, where feasible.

If surface water is to discharge to the Grey Irwell, then outfall details and proposed discharge rates should be agreed in principle with Peel Holdings.

If outfall into the Grey Irwell is proposed assessment of the impact of the flows into the River Irwell is required including consideration of the velocity and gradient constraints and the impact of high flows within the River Irwell on the proposed drainage network.

The use of pollution control measures for surface water discharge should be assessed and considered where appropriate.

If surface water is to be discharged into a United Utilities sewer this should be agreed in principle with them.

The Government has strengthened planning policy on the provision of sustainable drainage systems (SuDS) for 'major' planning applications which was introduced on 6 April 2015 (Paragraph 103 of National Planning Policy Framework and Ministerial Statement on SuDS). As per the guidance issued by the Department of Communities and Local Government (DCLG), all 'major' planning applications being determined from 6 April 2015, must consider sustainable drainage systems.

SuDS should be designed to control surface water as close to its source as possible. Well-designed sustainable drainage systems also provide opportunities to:

- reduce the causes and impacts of flooding,
- remove pollutants from urban run-off at source,
- combine water management with green space with benefits for amenity, recreation and wildlife.

The Council is encouraging use of green roofs, green walls, tree planting and other forms of green infrastructure to allow for the adaptation to climate change in heavily urbanised area. New Green infrastructure provision should be an exemplar of best practice and innovation in terms of both its design and management. Greater Manchester is the first city-region in the UK to develop a Natural Capital Investment Plan designed to encourage investments in natural capital that deliver financial as well as social returns.

The use of SuDS should also help achieve the sustainability objectives of the National Planning Policy Framework (NPPF).

The suitability of sustainable drainage systems should be assessed in accordance with paragraphs 051, 079 and 080 of the revised NPPF Planning Practice Guidance for Flood Risk and Coastal Change (<http://planningguidance.planningportal.gov.uk/blog/guidance/flood-risk-and-coastal-change/>).

Sustainable drainage systems should be designed in line with national Non-Statutory Technical Standards for SuDS (https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/415773/sustainable-drainage-technical-standards.pdf) and local policies EN08, EN09, EN14, EN15 and EN17 of the Core Strategy.

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.

Hydraulic calculations and drawings to support the design need to be provided along with proposed standards of operation and maintenance in accordance with paragraph 081 of NPPF Planning Practice Guidance.

Management and maintenance plan for the lifetime of the development which shall include the arrangements for adoption by any public body or statutory undertaker, or any other arrangements to secure the operation of the sustainable drainage scheme throughout its lifetime shall be submitted.



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Greater Manchester Archaeological Advisory Service
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M5 4WX

Jennifer Atkinson
Planning
Manchester City Council
PO Box 532
Town Hall
Manchester
M60 2LA

Date: 26th August 2021

Dear Jennifer

Archaeological Consultation: Trinity Islands – Scoping Opinion

Thank you for consulting GMAAS on this Scoping Report.

The Scoping Report includes a section prepared by Salford Archaeology that addresses archaeology and examines the baseline conditions. GMAAS was consulted during the preparation of the document, which identifies the most significant industrial period remains relating to a late 18th-century dye works, an early 19th-century warehouse and associated smithy established by the New Quay Company. The potential for the site to retain archaeological remains deriving from the Roman occupation of the area is also highlighted. The report commits to producing a more detailed archaeological desk-based assessment, and suggests that any further archaeological mitigation works arising from this can be undertaken through a negative planning condition attached to consent. The argument is made that the archaeology is not significant enough to warrant preservation *in-situ* and therefore can be preserved by excavation record prior to development ground works commencing.

GMAAS concurs with this conclusion, and considers that the below-ground archaeology for the Roman period and the 18th / 19th century 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 should be coupled with a programme of intrusive archaeological investigation via evaluation trenching, which will inform the requirement for and nature of any further and more extensive, targeted archaeological excavation, post-excavation analysis, report writing, archive deposition and dissemination of the results. It would be good risk management and proper practice in accordance with the National Planning Policy Framework for the archaeological evaluation to be undertaken ahead of submittal of a detailed planning application, although archaeological interests could otherwise be secured through a condition attached to planning consent.

Yours sincerely

Ian Miller
Heritage Management Director (Archaeology)
Tel: 07533 252 442



GMAAS, The University of Salford. Peel Building
0161 295 4467 www.salford.ac.uk email: i.f.miller@salford.ac.uk



AGMA
ASSOCIATION OF
GREATER MANCHESTER
AUTHORITIES



Ms Jennifer Atkinson
Manchester City Council
PO Box 532
Town Hall Extension
Manchester
M60 2LA

Direct Dial: 0161 2421442

Our ref: PL00755082

7 September 2021

Dear Ms Atkinson

Re: TRINITY ISLANDS ENVIRONMENTAL IMPACT ASSESSMENT (EIA)
SCOPING REPORT

Thank you for your letter of 24th August 2021 consulting us about the above EIA Scoping Report.

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. We would draw your attention, in particular, to the following:

- Castlefield Conservation Area
- Old Warehouse to North of Former Liverpool Road Railway Station
- Railway Bridge over River Irwell to Former Liverpool Road Station
- Former Liverpool Road Railway Station and Station Masters House

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



SUITES 3.3 AND 3.4 CANADA HOUSE 3 CHEPSTOW STREET MANCHESTER M1 5FW

Telephone 0161 242 1416
HistoricEngland.org.uk





opportunities for securing wider benefits for the future conservation and management of heritage assets.

Given the heights of the structures associated with the proposed development and the surrounding landscape character, this development is likely to be visible across a very 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.

It is important that the assessment is designed to ensure that all impacts are fully understood. Section drawings and techniques such as photomontages are a useful part of this.

Consideration should also be given to undertaking a practical exercise with either a crane or balloons erected at the height of the proposed buildings so that all parties are better able to understand the landscape impact of the proposals. We have been engaged in other major developments where this technique has been used and it greatly assisted the identification of the key issues and impacts from which the resulting EIA was able to focus its assessment.

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.

If you have any queries about any of the above, or would like to discuss anything further, please contact me.

Yours sincerely,

Richard Broadhead
Inspector of Historic Buildings and Areas
Richard.Broadhead@HistoricEngland.org.uk



Trinity Islands – Highway comments on EIA screening and scoping submission

With regard to traffic and transportation, MCC Highways are satisfied that the scoping document provided adequately sets out the principles upon which highway and traffic impacts can be identified and mitigated.

The developer has commissioned traffic surveys which were undertaken in June 2021 and provide an acceptable baseline from which to assess the impact of the development on the adjacent highway network. A Transport Assessment will be submitted at planning application stage for which the trip generation methodology has already been discussed and agreed in principle with TfGM and MCC Highways.

We note that more detailed modelling and safety assessments will be undertaken for the junctions of Trinity Way/Regent Road and for Trinity Way/Water Street and this is supported.

Of particular interest to MCC Highways are measures which will improve connectivity between this area and the city centre and in this regard, we would emphasise Water Street as a key route to improve for cyclists and pedestrians.

We note that between 550 and 750 underground parking spaces are to be provided across the development with at least 10% of them Electric Vehicle (EV) charge points. We would recommend that 20% of the bays are provisioned with EV charging with the remainder fitted with the means to allow easier future conversion.

The number of the disabled parking bays provided should align with the requirements of the Core Strategy, and we anticipate that some form of Car Club bay provision is made.

The cycle parking provision of one space per apartment is supported as are the proposed measures to provide additional cycle parking within the public realm.

We note the intention to provide a Travel Plan as part of the planning submission and this is welcomed by us to promote the use of sustainable transport modes.

Date: 27 August 2021
Our ref: 365826
Your ref: Trinity Islands



Manchester City Council
jennifer.atkinson@manchester.gov.uk

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

T 0300 060 3900

BY EMAIL ONLY

Dear Sir or Madam,

**Environmental Impact Assessment Scoping consultation: 2000 residential units, 900 square metres of commercial and leisure, underground parking and open space
Location: Trinity Islands, Trinity Way and adjacent River Irwell, Manchester**

Thank you for your consultation, which was received by Natural England on 24 August 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.

The scoping request is for a proposal that does not appear, from the information provided, to affect any nationally designated geological or ecological sites (Ramsar, SPA, SAC, SSSI, NNR) or landscapes (National Parks, AONBs, Heritage Coasts, National Trails), or have significant impacts on the protection of soils (particularly of sites over 20ha of best or most versatile land), nor is the development for a mineral or waste site of over 5ha.

At present therefore it is not a priority for Natural England to advise on the detail of this EIA. We would, however, like to draw your attention to some key points of advice, presented in annex to this letter, and we would expect the final Environmental Statement (ES) to include all necessary information as outlined in Part 4 of the Town & Country Planning (Environmental Impact Assessment) Regulations 2017. If you believe that the development does affect one of the features listed in paragraph 3 above, please contact Natural England at consultations@naturalengland.org.uk, and we may be able to provide further information.

Yours faithfully

Corben Hastings
Consultations Team

Annex A – Advice related to EIA Scoping Requirements

1. General Principles

Schedule 4 of the Town & Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended), sets out the necessary information to assess impacts on the natural environment to be included in an ES, specifically:

1. A description of the development, including in particular:

- (a) a description of the location of the development;
- (b) a description of the physical characteristics of the whole development, including, where relevant, requisite demolition works, and the land-use requirements during the construction and operational phases;
- (c) a description of the main characteristics of the operational phase of the development (in particular any production process), for instance, energy demand and energy used, nature and quantity of the materials and natural resources (including water, land, soil and biodiversity) used;
- (d) an estimate, by type and quantity, of expected residues and emissions (such as water, air, soil and subsoil pollution, noise, vibration, light, heat, radiation and quantities and types of waste produced during the construction and operation phases.

2. A description of the reasonable alternatives (for example in terms of development design, technology, location, size and scale) studied by the developer, which are relevant to the proposed project and its specific characteristics, and an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects.

3. A description of the relevant aspects of the current state of the environment (baseline scenario) and an outline of the likely evolution thereof without implementation of the development as far as natural changes from the baseline scenario can be assessed with reasonable effort on the basis of the availability of environmental information and scientific knowledge.

4. A description of the factors specified in regulation 4(2) likely to be significantly affected by the development: population, human health, biodiversity (for example fauna and flora), land (for example land take), soil (for example organic matter, erosion, compaction, sealing), water (for example hydromorphological changes, quantity and quality), air, climate (for example greenhouse gas emissions, impacts relevant to adaptation), material assets, cultural heritage, including architectural and archaeological aspects, and landscape.

5. A description of the likely significant effects of the development on the environment resulting from, inter alia:

- (a) the construction and existence of the development, including, where relevant, demolition works;
- (b) the use of natural resources, in particular land, soil, water and biodiversity, considering as far as possible the sustainable availability of these resources;
- (c) the emission of pollutants, noise, vibration, light, heat and radiation, the creation of nuisances, and the disposal and recovery of waste;
- (d) the risks to human health, cultural heritage or the environment (for example due to accidents or disasters);
- (e) the cumulation of effects with other existing and/or approved projects, taking into account any existing environmental problems relating to areas of particular environmental importance likely to be affected or the use of natural resources;
- (f) the impact of the project on climate (for example the nature and magnitude of greenhouse gas emissions) and the vulnerability of the project to climate change;
- (g) the technologies and the substances used. The description of the likely significant effects on the factors specified in regulation 4(2) should cover the direct effects and any indirect, secondary, cumulative, transboundary, short-term, medium-term and long-term, permanent and temporary, positive and negative effects of the development. This description should take into account the environmental protection objectives established at Union or Member State level which are relevant to the project, including in particular those established under Council Directive 92/43/EEC (a) and Directive 2009/147/EC(b).

6. A description of the forecasting methods or evidence, used to identify and assess the significant effects on the environment, including details of difficulties (for example technical deficiencies or lack of knowledge) encountered compiling the required information and the main uncertainties involved.
7. A description of the measures envisaged to avoid, prevent, reduce or, if possible, offset any identified significant adverse effects on the environment and, where appropriate, of any proposed monitoring arrangements (for example the preparation of a post-project analysis). That description should explain the extent, to which significant adverse effects on the environment are avoided, prevented, reduced or offset, and should cover both the construction and operational phases.
8. A description of the expected significant adverse effects of the development on the environment deriving from the vulnerability of the development to risks of major accidents and/or disasters which are relevant to the project concerned. Where appropriate, this description should include measures envisaged to prevent or mitigate the significant adverse effects of such events on the environment and details of the preparedness for and proposed response to such emergencies.

2. Biodiversity and Geology

2.1. Ecological Aspects of an Environmental Statement

Natural England advises that the potential impact of the proposal upon features of nature conservation interest and opportunities for habitat creation/enhancement should be included within this assessment in accordance with appropriate guidance on such matters. [Guidelines for Ecological Impact Assessment \(EclA\)](#) have been developed by the Chartered Institute of Ecology and Environmental Management (CIEEM) and are available on their website.

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.

The National Planning Policy Framework ([NPPF](#)) sets out guidance in paragraphs 170-171 and 174-177 on how to take account of biodiversity interests in planning decisions and the framework that local authorities should provide to assist developers.

2.2. Internationally and Nationally Designated Sites

Natural England undertakes an initial assessment of all development consultations, by determining whether the location to which they relate falls within geographical 'buffer' areas within which development is likely to affect designated sites. The proposal is located outside these buffer areas and therefore appears unlikely to affect an Internationally or Nationally designated site. However, it should be recognised that the specific nature of a proposal may have the potential to lead to significant impacts arising at a greater distance than is encompassed by Natural England's buffers for designated sites. The ES should therefore thoroughly assess the potential for the proposal to affect designated sites, including Special Areas of Conservation (SAC), Special Protection Areas (SPA), Ramsar sites and Sites of Special Scientific Interest (SSSI). Should the proposal result in an emission to air or discharge to the ground or surface water catchment of a designated site then the potential effects and impact of this would need to be considered in the Environmental Statement

Local Planning Authorities, as competent authorities under the provisions of the Conservation of Habitats and Species Regulations 2017 (as amended), should have regard to the Habitats Regulations Assessment process set out in Regulation 63 of the Habitats Regulations in their determination of a planning application. Should a Likely Significant Effect on a European/Internationally designated site be identified or be uncertain, the competent authority (in this case the Local Planning Authority) may need to prepare an Appropriate Assessment, in addition to consideration of impacts through the EIA process.

Statutory site locations can be found at www.magic.gov.uk. Further information concerning particular statutory sites can be found on the [Natural England website](#).

2.3. Protected Species

The ES should assess the impact of all phases of the proposal on protected species. Records of protected species should be sought from appropriate local biological record centres, nature conservation organisations, groups and individuals; and 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, to assist in the impact assessment.

The conservation of species protected by law 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 area likely to be affected by the proposal 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.

Natural England has adopted [standing advice](#) for protected species. It provides a consistent level of basic advice which can be applied to any planning application that could affect protected species. It also includes links to guidance on survey and mitigation.

Natural England does not hold comprehensive information regarding the locations of species protected by law, but advises on the procedures and legislation relevant to such species.

2.4. Regionally and Locally Important Sites

The ES should thoroughly assess the impact of the proposals on non-statutory sites, for example Local Wildlife Sites (LoWS), Local Nature Reserves (LNR) and Regionally Important Geological and Geomorphological Sites (RIGS). Natural England does not hold comprehensive information on these sites. We therefore advise that the appropriate local biological record centres, nature conservation organisations, Local Planning Authority and local RIGS group should be contacted with respect to this matter.

2.5. Biodiversity Action Plan Habitats and Species

The ES should thoroughly assess the impact of the proposals on habitats and/or species listed in the UK Biodiversity Action Plan (BAP). These Priority Habitats and Species are listed as 'Habitats and Species of Principal Importance' within the England Biodiversity List, recently [published](#) under the requirements of S14 of the Natural Environment and Rural Communities (NERC) Act 2006. Section 40 of the NERC Act 2006 places a general duty on all public authorities, including local planning authorities, to conserve and enhance biodiversity. Further information on this duty is available in the Defra publication '[Guidance for Local Authorities on Implementing the Biodiversity Duty](#)'.

Government Circular 06/2005 states that BAP species and habitats, 'are capable of being a material consideration...in the making of planning decisions'. Natural England therefore advises that survey, impact assessment and mitigation proposals for Habitats and Species of Principal Importance should be included in the ES. Consideration should also be given to those species and habitats included in the relevant Local BAP.

The record centre for the relevant Local Authorities should be able to provide the relevant information on the location and type of BAP habitat for the area under consideration.

3. Landscape, Access and Recreation

3.1. Landscape and Visual Impacts

The consideration of landscape impacts should reflect the approach set out in the *Guidelines for Landscape and Visual Impact Assessment* (Landscape Institute and the Institute of Environmental Assessment and Management, 2013, 3rd edition), the *Landscape Character Assessment Guidance for England and Scotland* (Scottish Natural Heritage and The Countryside Agency, 2002) and good practice. The assessment should also include the cumulative effect of the development with other relevant existing or proposed developments in the area. In this context Natural England would expect

the cumulative impact assessment to include those proposals currently at Scoping stage. Due to the overlapping timescale of their progress through the planning system, cumulative impact of the proposed development with those proposals currently at Scoping stage would be likely to be a material consideration at the time of determination of the planning application.

The assessment should refer to the relevant [National Character Areas](#) which can be found on our website. Links for Landscape Character Assessment at a local level are also available on the same page.

3.2. Access and Recreation

The ES should include a thorough assessment of the development's effects upon public rights of way and access to the countryside and its enjoyment through recreation. With this in mind and in addition to consideration of public rights of way, the landscape and visual effects on Open Access land, whether direct or indirect, should be included in the ES.

Natural England would also expect to see consideration of opportunities for improved or new public access provision on the site, to include linking existing public rights of way and/or providing new circular routes and interpretation. We also recommend reference to relevant Right of Way Improvement Plans (ROWIP) to identify public rights of way within or adjacent to the proposed site that should be maintained or enhanced.

4. Land use and soils

Impacts from the development should be considered in light of the Government's policy for the protection of the best and most versatile (BMV) agricultural land as set out in paragraph 170 and 171 of the NPPF. We also recommend that soils should be considered under a more general heading of sustainable use of land and the valuing of the ecosystem services they provide as a natural resource, also in line with paragraph 170 of the NPPF.

Soil is a finite resource that fulfils many important functions and services (ecosystem services) for society; for instance as a growing medium for food, timber and other crops, as a store for carbon and water, as a reservoir of biodiversity and as a buffer against pollution. It is therefore important that the soil resources are protected and used sustainably. The Natural Environment White Paper (NEWP) '*The Natural Choice: securing the value of nature*' (Defra, June 2011), emphasises the importance of natural resource protection, including the conservation and sustainable management of soils and the protection of BMV agricultural land.

Development of buildings and infrastructure prevents alternative uses for those soils that are permanently covered, and also often results in degradation of soils around the development as result of construction activities. This affects their functionality as wildlife habitat, and reduces their ability to support landscape works and green infrastructure. Sealing and compaction can also contribute to increased surface run-off, ponding of water and localised erosion, flooding and pollution.

Defra published a Construction [Code of Practice for the sustainable use of soils on construction sites](#) (2009). The purpose of the Code of Practice is to provide a practical guide to assist anyone involved in the construction industry to protect the soil resources with which they work.

As identified in the NPPF new sites or extensions to new sites for Peat extraction should not be granted permission by Local Planning Authorities or proposed in development plans.

General advice on the agricultural aspects of site working and reclamation can be found in the Defra [Guidance for successful reclamation of mineral and waste sites](#).

5. Air Quality

Air quality in the UK has improved over recent decades but air pollution remains a significant issue; for example over 97% of sensitive habitat area in England is predicted to exceed the critical loads for ecosystem protection from atmospheric nitrogen deposition ([England Biodiversity Strategy](#), Defra 2011). A priority action in the England Biodiversity Strategy is to reduce air pollution impacts on biodiversity. 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 assessment should take account of the risks of air pollution and how these can be managed or reduced. 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). Further information on air pollution modelling and assessment can be found on the Environment Agency website.

6. Climate Change Adaptation

The [England Biodiversity Strategy](#) published by Defra establishes principles for the consideration of biodiversity and the effects of climate change. The ES should reflect these principles and identify how the development's effects on the natural environment will be influenced by climate change, and how ecological networks will be maintained. The NPPF requires that the planning system should contribute to the enhancement of the natural environment "by establishing coherent ecological networks that are more resilient to current and future pressures" ([NPPF](#) Paras 170 and 174), which should be demonstrated through the ES.

RE: EIA Scoping Opinion Request - Trinity Islands

Planning Liaison <Planning.Liaison@uuplc.co.uk>

Wed 01/09/2021 10:51

To: Planning <Planning@manchester.gov.uk>; Jennifer Atkinson <jennifer.atkinson@manchester.gov.uk>

Dear Sir / Madam,

In response to this Screening Request, United Utilities does not comment on Screening or Scoping Requests as the level of information we require in terms of understanding any water or wastewater requirements is likely to only become available once the development proposal is progressed nearer to planning application stage. Once the appropriate information is available, we would review and recommend any necessary planning conditions at the planning application consultation stage.

We do however, wish to continue to work closely with local authorities and developers alike in a bid to support sustainable development and economic growth. We would encourage potential developers to contact us at the appropriate time for pre-application discussions. Information for our pre-application services for both water and wastewater is available on our website.

Kind Regards,



David Talbot

Planning Analyst

Planning, Landscape and Ecology

M: 07388709911

Email: Planning.Liaison@uuplc.co.uk

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Wash your hands

From: Planning [mailto:Planning@manchester.gov.uk]

Sent: 24 August 2021 12:34

To: Jennifer Atkinson <jennifer.atkinson@manchester.gov.uk>

Subject: EIA Scoping Opinion Request - Trinity Islands

EXTERNAL EMAIL This email originated outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended) (the "EIA" Regulations) - Request for Scoping Opinion

Trinity Islands

Under Part 4, Regulation 15 of the above regulations, I am informing you of a request made to Manchester City Council for a Scoping Opinion regarding the above development. A copy of the developer's Scoping request available using the following link, which sets out what they believe the scope of the Environmental Impact Assessment (EIA) should be.

<https://we.tl/t-13mTV92SFa>

The purpose of the request is to enable the City Council to make clear to the developer what it considers the main effects of the proposed development are likely to be and therefore the topics on which the proposed EIA should focus.

I am required, under the Regulations, to remind you of your obligation to make available, if requested, any relevant information in your possession. However, you are only required to provide information that is in your possession and there is no obligation to undertake research or otherwise to take steps to obtain information that you do not already have.

The City Council has five weeks from the date of the request to provide a formal Scoping Opinion. If you wish to make any comments to aid the Council in the formulation of a Scoping Opinion, please can you respond to jennifer.atkinson@manchester.gov.uk no later than 14 September 2021.

Kind regards
Anthony Moore
Technical Support Team Leader

Technical Support Team (Planning)
Planning, Building Control & Licensing
Growth & Development Directorate
Postal address: Manchester City Council, P O Box 532, Town Hall, Manchester M60 2LA
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