



**MANCHESTER
CITY COUNCIL**

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16th November 2021

Mr Neil Alcock
Deloitte LLP
The Hanover Building,
Corporation Street,
Manchester,
M4 4AH

Date: 16th November 2021
Our reference: Port Street / Vita

Dear Mr Alcock

**Environmental Impact Assessment Regulations, the Town and Country
Planning (EIA) (England) Regulations 2017 (as amended) (the “EIA Regulations”).**

Scoping Request Under Part 4 Regulation 15(1)

Land bounded by Great Ancoats Street (north), Brownsfield Mill, surface car parks to the south and east, and Port Street to the west.

Scoping Opinion of Manchester City Council Pursuant to Regulation 15

Further to your request in respect of the above dated 12th October 2021 and extension e-mail dated 15th November 2021.

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 ” Environmental Impact Assessment (EIA) Screening and Scoping Report October 2021 by Deloitte ”and 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 and 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 the applicant intends to submit with the planning application 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 organizations and bodies that responded to consultation on the Scope of the proposed ES.

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 October 2021 sets out the proposed chapters that the ES will cover, and the disciplines which you believe should be scoped out of the EIA.

These are as follows:

Scoped In

- *Townscape and Visual;*
- *Daylight and Sunlight;*
- *Heritage;*
- *Wind Microclimate;*
- *Socioeconomic;*
- *Human Health; and*
- *Climate Change.*

- Noise and Vibration

Scoped out

- *Agricultural circumstances;*
- *Air quality and dust;*
- *Archaeology;*
- *Ecology and nature conservation;*
- *Lighting;*
- *Transport and Access;*
- *Ground conditions;*
- *Flood Risk and Drainage*
- *Waste;*
- *Accidents and disasters;*
- Solar Glare;
- TV and Telecommunications

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 appropriate 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.

- Historic England;
- Natural England;
- Environment Agency;
- Greater Manchester Ecology Unit (GMEU);
- Greater Manchester Archeology Advisory Service (GMAAS);
- Transport for Greater Manchester (TfGM);
- United Utilities;
- City Council Highway Services;

- City Council Environmental Health;
- City Council Flood Risk Management;
- Manchester Airport Safeguarding (SMAIRS)
- Canal and Rivers Trust

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 planning application process as the development proposal evolves. It is thereby recommended all consultee responses are reviewed by 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 the applicant and should be given due consideration in the planning application process EIA process.

CONTEXT

The site is approximately 0.48 ha and is comprised of a surface level car park of low-quality hardstanding. The site levels drop by circa 2m from the northern and western boundaries to a lower level which also forms part of the car park. There is no vegetation on site. The Site can be accessed by foot or on vehicle by using the car park entrances on Port Street.

There is a mixture of uses surrounding the Site. Immediately to the west of the Site there is The Astley, Oxid House and The Wentwood which are mid to high rise apartment buildings with some ground floor commercial frontages as well as a surface level car park.

To the north and north east of the Site, across Great Ancoats Street is the heart of Ancoats and New Islington, these are newly regenerated areas of Manchester containing a mixture of mid-rise developments including residential and commercial uses. To the east of the Site is Brownsfield Mill, a Grade II* Listed mill building which has been recently refurbished to create new apartments and the Rochdale Canal. To the south of the Site is a number of mid to high-rise development comprising a residential use and sit within the centre of the Piccadilly Basin.

The site is also located close to Piccadilly Station and the Northern Quarter. It falls within both the HS2 Strategic Regeneration (2014) and Piccadilly Basin Strategic Regeneration Framework Area (2016) (Plots A&B). In terms of the latter this is aims to deliver new housing and employment space within a mixed-use neighbourhood, based around a waterway in the heart of the City Centre.

Planning permission was granted in 1998 for a mixed use development at Piccadilly Basin comprising housing, retail and studio office space and included works to listed buildings and the canal. Jackson's Warehouse was restored and Vantage Quay was developed

alongside the formation of the Marina which connects these sites and the planning permission has been lawfully implemented. Planning permission was granted in 2007 for a revised masterplan but it was never implemented. Other development within the SRF Area since 2007 has included Construction of the Urban Exchange Retail Park, adjacent to Great Ancoats Street at the north east of the site; A 232-space multi-storey car park on Tariff Street; investment in public realm including the Canal, in addition to the formation of the Marina; refurbishment of the Grade II* Listed Brownsfield Mill to create high quality residences; Development of Burlington House, an 11-storey residential building comprising 91 residential apartment; and development of the 9 storey Dakota Hotel on Ducie Street.

Within the 2016 SRF the application site is indicated as Plot's A and B and an approximate height for development on the site is indicated at Ground plus 32 storeys (Plot A) and Ground plus 19 storeys (Plot B)

The site lies within a highly accessible City Centre location accessible by a variety of public transport including Metrolink, bus and rail. Manchester Piccadilly is the nearest railway station. The station predominantly provides local and regional mainline services to the north of England. Metrolink services are also available in the area, the closest of which is located at New Islington.

SENSITIVE RECEPTORS

The site is located within the Greater Manchester Combined Authority Air Quality Management Area (AQMA). The Site lies within 4.9 km to Rochdale Canal Special Area of Conservation (SAC) and Site of Special Scientific Interest (SSSI), 6.3 km of the Hollinwood Branch Canal SSSI and 8.7km Huddersfield Narrow Canal SSSI. The Site lies within the SSSI Impact Risk Zones for the above sites. The development proposals do not meet SSSI Impact Risk Zone criteria for which the LPA must consult with Natural England.

The Rochdale Canal is located 48m south of the Site; however, the section of the canal that is designated as a Special Area of Conservation (SAC) is located 4.9km from the Site. Due to this designation the canal is an offsite ecological receptor along with two Sites of Biological Interest (SBI) – Rochdale Canal: Stott's Lane – Ducie Street Basin 48m south of the Site and Ashton Canal (West) located 238m south.

The site is located within Flood Zone 1(indicating a less than 1 in 1,000 annual probability of flooding).The site is situated within the Manchester, Salford and Trafford Critical Drainage Area (CDA).

The Site is not located within a Conservation Area and there are no Listed Buildings within the Site. The Site is located adjacent to the Ancoats Conservation Area to the north and the Stevenson Square Conservation Area is located circa 90m southwest of the Site. There are 50 Grade II and II* Listed Buildings and Structures within a 250m radius of the Site.

The nearest Listed Buildings and structures are outlined below:

Grade II* Listed Brownsfield Mill (adjacent to Site on eastern boundary); Grade II* Former Rochdale Canal Warehouse (circa 40m south); Grade II Listed Rochdale canal towpath

footbridge and associated ramps opposite Brownsfield Mill (circa 45m east); Grade II Listed Rochdale Canal lock number 82, to east of Great Ancoats Street (circa 55m north); Grade II Listed Rochdale Canal lock number 83, to the east of Tariff Street (circa 70m south); Grade II Listed 72-76, Newton Street (circa 55m west); Grade II* Decker Old Mill (circa 185m north); Grade II* New Mill (circa 205m north); Grade II* Royal Mill (circa 95m north); Grade II* Dale Warehouse (circa 215m south); and Grade II* Paragon Mill (circa 130m north).

Residential properties lie to the south east and north west of the development site at The Astley, Oxid, Nuovo and Brownsfield Mill (all Great Ancoats Street) and Burlington House, Jackson's Warehouse and Vantage Quay (Tariff Street/ Brewer Street).

PROPOSED DEVELOPMENT

The Proposed Development would involve the delivery of up to 500 residential units and be up to 35 storeys in height with ground floor commercial uses (use Class E and Sui Generis) up to 30 car parking spaces and 500 cycle parking spaces and approximately 3,000 sqm of external area, landscaping, access and other associated works. It is noted that the proposed figures are not fixed and are part of an evolving design.

I have now had a chance to consider your scoping request alongside the consultation responses received and I outline my response below.

Overall, I can confirm that the content of the submitted 'Formal Scoping Opinion Request' is considered to be appropriate and will form a generally appropriate structure for the Environmental Statement. This is also reflected in the nature of the consultation responses issued with this letter. You should note the specific points which have been made and therefore particularly regard must be given to these.

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.

No alternatives for consideration have been detailed within the scoping report and these will have to be considered alongside an indication of the main reasons for the option chosen, including a comparison of the environmental effects within the ES.

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 in a manner which is comprehensible to the specialist and non-specialist alike. The ES should be concise with supporting technical information placed in appendices

Mitigation

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 in this manner within each of 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 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.

Cross references and summarising of the findings

All specialist chapters should be cross-referenced to other relevant disciplines (for example air quality impacts on ecology, 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 just 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 ES.

Air Quality

The comments within your scoping report are noted. It is accepted that subject to an Air Quality Assessment being submitted as part of the supporting documents to the planning application and this including the following details:

Details of any mitigation required following the site suitability assessment to ensure air quality objectives are met for the proposed end use (including EV charge points/infrastructure and energy strategy) that Air Quality can be scoped out of the ES.

Archaeology

The Scoping Report identifies the most significant industrial-period remains on the site relating to 19th-century workers' housing of several different types of plan form, and also infrastructure associated with a former arm of the Rochdale Canal that crosses the application site. It is noted that this report commits to producing a more detailed archaeological desk-based assessment to enable a decision to be reached regarding the requirement for any further investigation in advance of development. GMAAS concurs with this conclusion and considers that the below-ground archaeology has the potential to be of local to regional significance. On the basis that GMAAS accept that the archaeology is unlikely to be of national significance. Therefore Archaeology can be scoped out of the ES provided the planning application is supported by a detailed archaeological desk-based assessment.

Aviation

The comments within your Scoping Report are noted as is the proposed mitigation and on this basis it is considered that Aviation can be scoped out of the ES provided that the planning application is supported by information which considers the relevant aerodrome safeguarding criteria, consultation procedures, and addressed any potential impacts on aircraft safety. Such consideration will principally relate to the height of buildings at this location and whether there is any potential interference to RADAR operations.

Ecology and nature conservation

The comments within your scoping report are noted. The site currently comprises entirely of existing hardstanding that is in use as a car park. The Site is bounded to the north east and north west by Great Ancoats Street and Port Street, respectively both of which have street lighting. Great Ancoats Street in particular is a large, busy road. As such the site is of limited ecological value and any potential impact on ecology is considered to be of no more than local significance. The ecological value of the development site is low, and it is noted that there is the potential to enhance ecology and biodiversity in this area. On this basis I accept that an ecological assessment can be scoped out of the ES and can instead form part of the supporting documents to the planning application.

Notwithstanding this the following should be submitted to support the application:

- A Phase 1 Habitat Survey, which may help to inform any proposals to improve the nature conservation value of the site / area.

It should be noted should the planning submission be delayed beyond survey season 2021 then the survey would need to be revisited.

Ground conditions

The comments within your scoping report are noted. It is accepted that subject to a Phase 1 and 2 Geo-Environmental Assessment being submitted as part of the supporting documents to the planning application that Ground Conditions can be scoped out of the ES

Transport and Access

The comments within your scoping report are noted. I consider that Transport and Access does not need to be included as part of the EIA and on the basis of these it is agreed that Transport and Access can be scoped out of the ES. The application should however be supported by a Transport Assessment (TA).

Traffic Impact and Transport Modelling Requirements (to be included within a TA) are set out below:

- I. TfGM UTC can be contacted in respect of the availability of any traffic counts in the area that could be used for the assessment, as new counts are not always required.
- II. A description of current baseline traffic conditions in the area.
- III. An analysis of injury accidents during a recent five-year period, commenting on whether there are any underlying patterns of injury accidents that might be affected by the development.
- IV. Traffic surveys and queue surveys (weekdays) - scope to be agreed with TfGM UTC and HFAS.
- V. A clear estimate of the level of new traffic likely to be associated with the development, based on an inspection of similar (and similarly-located) developments across the UK (excluding London) via the TRICS (or similar) database. The assessment work should be undertaken using a person-trip approach and applying the appropriate modal share percentages from local Census data. Other methodologies to determine trip rates are acceptable but these should be fully explained in the TA.

VI. A clearly defined methodology for determining the distribution / assignment of development trips onto the network i.e. understanding of where such new traffic is likely to distribute to/from, based on data sources such as Census Journey-to-Work statistics and/or vehicle turning proportions at nearby junctions.

VII. An assessment of traffic levels and impacts at the specified year of opening of the development, and at a future year at least five years later, with due regard for traffic growth (if any).

VIII. An understanding of the likely impacts of the proposed development considered alongside any other nearby committed developments.

IX. In the relevant TA, clear diagrams should be provided illustrating the following elements, each individually:

- Base Flows
- Committed Development Flows
- Proposed Flows
- Proposed Distribution
- Base plus Committed plus proposed development
- Future plus Committed plus proposed development

X. TfGM HFAS recommends an increase of about 30vehs/hr at a junction as an appropriate threshold for considering the necessity of a traffic impact assessment; this is in preference to a percentage-increase threshold, which tends to favour development in already heavily-trafficked areas.

XI. The scope of the junctions to be assessed by detailed modelling should be agreed with TfGM (UTC) and the Local Authority in advance and will depend upon the outcome of the trip assessment and distribution exercise. For this reason, TfGM would advise that a trip generation and distribution exercise should be issued before submission of the planning application. Once this is undertaken it will be possible to finalise TfGM requirements in terms of the TA. This will largely depend on the amount of trip generation.

XII. Clear details of proposed vehicular access arrangements including general servicing arrangements. An engineering drawing should be supplied showing the changes to the road network to fully understand the impact of the proposed development.

XIII. A swept path analysis should be provided for any vehicular access.

XIV. A review of Traffic Regulation Orders on the surrounding streets in the vicinity of the development.

XV. An assessment of the likely environmental/traffic impacts of HGVs during the construction process.

2. Site Accessibility by Sustainable Modes

Walking and cycling should form the natural mode choice for shorter trips, and also provide a viable option to facilitate longer trips through providing easy access to public transport. New developments should connect with, and enhance, existing walking and cycling networks in their vicinity, and also provide high quality facilities and networks for walking and cycling within development sites.

The TA should include a comprehensive review of the existing provision in the vicinity of the site for all pedestrians including those with disabilities. In addition to walking distances and pedestrian desire lines, pedestrian environment (including footway condition and widths) and pedestrian safety and security should be considered.

An audit of the footways in the vicinity of the development should be undertaken and improvements identified.

A comprehensive review of the cycling infrastructure in the vicinity of the proposed development should also be undertaken. This should include an assessment of the connectivity of the site with existing cycle routes. The quality and condition of existing infrastructure, cyclist safety and security should also be considered.

The catchment area for cycling, walking and public transport should be captured in maps. The quality of the routes for pedestrians and cyclists should be described and this should include a description of any signing for cycle routes as appropriate.

The TA should provide a review of existing public transport services (including service frequency and location of nearest stations/stops), with a view to supporting improvements to existing public transport services as required, in particular, assess the quality of the surrounding bus infrastructure i.e. upgrade to shelters etc.

The TA should include a plan clearly showing details of the proposed pedestrian and cycle access points serving the site and linkages into the surrounding area. Connectivity with local public transport networks should be highlighted. The developer should consider measures to encourage access by sustainable modes. Possible measures include but are not limited to the provision of pedestrian crossings, cycleways, cycle parking, new/improved footway ensuring that there are linkages into existing cycle and pedestrian facilities, as well as upgrades to existing bus stops (where appropriate).

TfGM would suggest that a pedestrian survey is carried out in the vicinity of the site, as per guidance <https://www.livingstreets.org.uk/media/1434/street-review-guidance-for-web.pdf> and included as part of the TA

Details of cycle parking facilities for the proposed development (e.g. number of spaces, location and type) should be provided and shown on plan.

3. Mitigation Measures

Impacts of the development should be identified through the above assessment work. The developer should identify appropriate mitigation to accommodate any increases in traffic generation and increased pedestrian and cyclist movements. Any appropriate mitigation should be identified in conjunction with TfGM UTC and the Local Authority who will be happy to work with the developer to agree an approach.

The TA should consider the impact of the development on the existing public transport networks in terms of extension of bus services, additional person trips. Mitigation measures should be considered where appropriate.

A Framework Travel Plan for the development should accompany any future planning application.

If there are any changes planned for bus infrastructure, for example relocation of existing bus stops or the creation of new bus parking areas, TfGM would request that the developer liaise directly with TfGM's bus infrastructure which can be contacted at Shelters@tfgm.com

Water Resources (including Drainage and Flood Risk)

The comments within your scoping report are noted and are generally acceptable in terms of their consideration in the ES. However the following should be noted:

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

The proposed development is within an area predominantly at 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.

The area is situated within the Conurbation Critical Drainage Area and is a brownfield site. In accordance with the Manchester City Council SFRA surface water runoff should be managed through SuDS to achieve at least a 50% reduction in existing brownfield runoff rates with the aim of achieving greenfield runoff.

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 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.

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, 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 paragraph 081 of NPPF Planning Practice Guidance.

Consideration should be given to blue and green roofs and other green SuDS solutions to manage surface water runoff from the development, including swales, rain gardens, SuDS enabled tree pits.

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

On the above basis I agree that Water Resources (including Drainage and Flood Risk) can be scoped out of the ES.

Lighting

There are no comments within your scoping report in relation to this however it is considered that the proposed development would not result in impacts which would require consideration within the ES. It is accepted that Lighting is capable of being scoped out of the ES but information on this should form part of the supporting documents to the planning application

Waste

There are no comments within your scoping report in relation to this however it is considered that the proposed development would not result in impacts which would require consideration within the ES. However, the approach to waste management should also cover management of residential and commercial waste with a waste assessment and a completed waste proforma will need to be provided with the application to demonstrate that the commercial and residential waste storage and collection regime will comply with the requirements of GD04. Subject to this detail and a Site Waste Management Plan ('SWMP') forming part of the supporting documents to the planning application. Waste can therefore be scoped out of the ES.

Accidents and disasters

There are no comments within your scoping report in relation to this, however it is considered that the nature of the proposed development is not considered to pose risk of major accidents and/or disasters or result in impacts which would require consideration within the ES. As such, accidents and disasters can be scoped out of the ES.

TV and Telecommunications

There are no comments within your scoping report in relation to this, however it is considered that the proposed development would not result in impacts which would require consideration within the ES. The application should however be supported by a report on the possible interference created by the proposed development on TV and radio reception within the area.

Solar Glare (See Sunlight, Daylight and Overshadowing)

Summary

I agree that some of the matters you have identified to be scoped out of the ES are appropriate with the addition of TV and Telecommunications, Accidents and Disasters, Waste and Lighting.

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 re-consider 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.

- Socio-economic;
- Townscape and Visual Impact;
- Heritage
- Wind Microclimate.
- Human Health
- Climate Change
- Noise and Vibration
- Daylight, Sunlight and Overshadowing (not including solar glare)

General Comments

The scoping report identifies the development site as being located within Manchester City Centre. For planning purposes, the development site is located in the Regional Centre (policy EC3) as defined within the Manchester Core Strategy (2012).

The significance of the site in regional terms should be reflected throughout the ES. The Environmental Chapters must therefore consider the impacts of the Proposed Development on the local context 'Regional Centre' together with Manchester City Centre, the North West Region and the national context (where appropriate) in order to determine any wider significant environmental impacts.

Socio Economic Issues

The assessment scope within your scoping report is noted and is acceptable in terms of the consideration of Socio Economic issues in the ES.

Townscape and Visual Impact

The assessment scope within your scoping report is noted including the Receptors and Key views within Appendix 6 Figures and is acceptable in terms of the consideration of Townscape and Visual Impact in the ES.

It is essential that the ES considers the cumulative impacts of other developments in order to full understand the likely impacts of the Proposed Development.

Heritage

The assessment scope within your scoping report is noted. 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. The assessment should 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.

The assessment should be designed to ensure that all impacts are fully understood. Section drawings and techniques such as photomontages should be part of this. 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

On the above basis the scope of consideration of Heritage is acceptable in terms of its consideration in the ES.

Wind and microclimate

The assessment scope within your scoping report is noted and on this basis the scope of consideration is acceptable in terms of the consideration of Wind and Microclimate issues in the ES

Human Health

The assessment scope within your scoping report is noted.

Matters of wind microclimate, climate change 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.

On the above basis the scope of consideration of Human Health is acceptable in terms of its consideration in the ES.

Climate Change

The assessment scope within your scoping report is noted.

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

Matters of wind microclimate, human health and socio-economic effects have all been scoped into the ES due to these disciplines having significant environmental impacts. All of these matters affect climate change and therefore the Proposed Development is likely to give rise to significant environmental impacts on the climate which should be considered and evaluated through the ES.

A broad approach and methodology for assessing the impact on climate change should be considered. Impacts and potential mitigation from the other technical chapters should feed into this assessment particularly around management of surface water, waste management, social value, green and blue infrastructure, biodiversity and ecology, travel planning and efficiency of the building fabric, an assessment of the lifecycle of the building (including management of embodied carbon) and use of renewable energy as part of promoting a low carbon development and reducing emissions and the likely environmental impacts of this.

On the above basis the scope of consideration of Human Health is acceptable in terms of its consideration in the ES.

Noise and Vibration

The assessment scope within your scoping report are noted and on this basis the scope of consideration of Noise and Vibration is acceptable in terms of its consideration in the ES.

Daylight, Sunlight and Overshadowing

The assessment scope within your scoping report are noted. Waterway and waterway users be identified as receptors should also be considered as part of this assessment.

It is noted that solar glare is proposed to be scoped out of the ES, however this will be reviewed as the design progresses and once the façade details are known, should the detailed façade design comprise of large areas of glazing, a solar glare assessment will be undertaken for any sensitive road junctions within 500 metres of the Site where the Proposed Development would be visible within a drivers field of view and this approach is considered to be acceptable.

On the above basis the scope of consideration of Daylight, Noise and Overshadowing is acceptable in terms of consideration in the ES.

Cumulative impacts

The list of cumulative sites for assessment has been considered in order to assess any cumulative impacts of developments in this part of the City Centre is acceptable in terms of consideration in the ES

Matters which should be scoped in

I consider that given the magnitude of the development, that there are no matters other than those detailed above which are required to be scoped into the EIA.

Cumulative impacts

The list of cumulative sites for assessment has been considered and is acceptable.

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.

This letter also confirms the matters within part I of Schedule 4 to the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 that need to be covered within the Environmental Statement.

If you wish to discuss the above please contact Angela Leckie on the above number.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Julie Roscoe', with a stylized, cursive script.

PP Julie Roscoe

for the Head of Planning (attachments sent by e-mail)