



**MANCHESTER  
CITY COUNCIL**

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Your reference:

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20<sup>th</sup> August 2021

FAO Ed Harvey  
Associate Director  
Planning, Development & Regeneration  
Avison Young  
Norfolk House  
7 Norfolk Street  
Manchester  
M2 1DW

Dear Sir / Madam

**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 Deansgate to the east, Blackfriars Street (south), Victoria Bridge  
Street (north) and the Renaissance Hotel and River Irwell (west).**

**Scoping Opinion of Manchester City Council Pursuant to Regulation 15**

Further to your request in respect of the above dated 17<sup>th</sup> June 2021 along with the revised wind assessment methodology in relation to the proposed residential-led development at land east of Deansgate, Manchester, e-mail from Gray Scanlan Hill dated 21-07-21, and e-mail of 06-08-21 responding to Highways comments and your agreement of an extension of time until 20<sup>th</sup> August 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 “ *EIA Scoping Report Proposed Residential-led Development, Renaissance Hotel Site, Manchester June 2021*”, the “ *Revised wind assessment methodology in relation to the proposed residential-led development at land east of Deansgate, Manchester*” and the e-mail from Gray Scanlan Hill dated 21-07-21 (in relation to scoping out Daylight, Sunlight and Overshadowing) prepared and submitted by

yourselves on behalf of the Applicant Deansgate SOF Alliance Residential Co Limited 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 the June 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;*
- *Heritage;*
- *Wind Microclimate;*
- *Socioeconomic;*
- *Human Health; and*

- *Climate Change.*

#### *Scoped out*

- *Agricultural circumstances;*
- *Air quality and dust;*
- *Archaeology;*
- *Daylight and Sunlight;*
- *Ecology and nature conservation;*
- *Noise and Vibration;*
- *Lighting;*
- *Transport and Access;*
- *Ground conditions;*
- *Flood Risk and Drainage*
- *Waste;*
- *Accidents and disasters;*

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;

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 0.2087ha and is part occupied by Premier House a partially hoarded off vacant office building, a ground floor service yard and areas of hard and soft landscaping adjacent to the River Irwell.

The site lies within a wider site bounded by Deansgate to the east, Blackfriars Street to the south, Victoria Bridge Street to the north and the Renaissance Hotel and River Irwell to the west which has long been earmarked for comprehensive development and lies within the Area covered by the Ramada Complex Strategic Regeneration Framework (Rev 04 May 2018).

The Renaissance hotel complex comprises the former hotel, Premier House office block, and NCP car park. Premier House is a four-storey vacant office building with over 100 metres of inactive frontage to Deansgate.

The area which is the subject of this Scoping Opinion is located in the north eastern portion of the SRF Area. The Site is not located within a Conservation Area, nor does it contain any Listed Buildings however it is viewed within the setting of the Grade I Listed Manchester Cathedral and Chetham's School of Music and the St Ann's Square and Cathedral Conservation Area form part of the site's setting.

Prior approval was recently granted for the partial demolition (south east part) of Premier House (application ref no 130049/DEM/2021).

The site lies within a highly accessible City Centre location accessible by a variety of public transport including Metrolink, bus and rail. The closest bus stop to the site is located adjacent to the sites eastern border on Deansgate. This stop serves "Route 3", a free bus service providing access around the City Centre during peak periods Monday – Friday, and "Route 8" between Shudehill Interchange and Bolton. Manchester Victoria is the nearest railway station and is located approximately 360m northeast of the site. 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 Exchange Square, approximately 200m east of the site.

## **SENSITIVE RECEPTORS**

The western extent of the site is located within the Greater Manchester Combined Authority Air Quality Management Area (AQMA). 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 site is not located in an Area of Outstanding Natural Beauty (AONB) or any other area designated for its landscape value. The closest watercourse to the site is the River Irwell located adjacent to the sites western border.

The site is mainly located within Flood Zone 1 (indicating a less than 1 in 1,000 annual probability of flooding) but the western boundary and south western portion of the site is situated partly within Flood Zone 3 (a high probability of flooding of 1 in 100 or greater) and part of the central portion is within Flood Zone 2 (a medium probability of flooding of between 1 in 100 and 1 in 1,000 years). The site is at Very Low risk with regards to pluvial flooding. The western extent of the site is located within an area at risk from flooding from reservoirs. The site is situated within the Manchester, Salford and Trafford Critical Drainage Area (CDA).

There are no designated heritage assets (Scheduled Monuments, Grade I, II\* and II Listed Buildings, Conservation Areas, Registered Parks and Gardens or Registered Battlefields) within the site boundary. There are 129 statutory Listed Buildings, one Scheduled Monument and eight Conservation Areas within a 500m radius of the site. The closest heritage assets to the site are:

- Grade II Listed Victoria Bridge, located adjacent to the site's northern boundary;
- Grade II Listed Blackfriars Bridge, located adjacent to the site's southern boundary;
- Grade I Listed Cathedral Church of St Mary, located approximately 60m north;
- The Hanging Bridge immediately south of Manchester Cathedral Scheduled Monument, located approximately 60m northwest;
- Cathedral Conservation Area, located adjacent to the sites northern border; and
- Parsonage Gardens Conservation Area, located adjacent to the sites southern border.

Residential properties lie to the south and south east of the development site on Deansgate (No.1 Deansgate), Blackfriars (Britannic Buildings) Victoria Bridge Street (parts of North Tower) which are all at least partially, residential apartment buildings.

## **PROPOSED DEVELOPMENT**

The Proposed Development would involve the redevelopment of above for a 303 residential dwellings within 2 blocks a high-rise approximately 27-storey tower (approx. 124.2m AOD) (including ground floor and mezzanine (above 2 basement levels) with roof top amenity linked to a 12 storey block (including ground floor and mezzanine (above 2 basement levels)) with roof top amenity (approx. 78.110m AOD). There would be with external terraces to some high level apartments. Up to approximately 5,000 sqft ground floor retail floorspace and up to 6,000sqft of residential amenity space is also proposed

alongside public realm and landscaping, and associated Infrastructure, Services and Utilities.

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.

The alternatives detailed within the scoping report are considered to be acceptable. The ES should include an indication of the main reasons for the option chosen, including a comparison of the environmental effects.

### **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 be 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 EIA.

## **Archaeology**

The Scoping Report observes that having undergone development throughout the 20th century, any archaeological remains beneath the site will have been either removed, truncated or destroyed. A small pocket that still holds potential for 19th century archaeological remains is located in the south-west corner of the development site and in the central western part of the site alongside the Irwell – but these will not be impacted by development works. As a result, there will be no significant effects which would require consideration and therefore archaeology can be scoped out of the ES provided the planning application is supported by an appropriate report which supports these conclusions.

## **Daylight, Sunlight and Overshadowing**

The comments within the Gray Scanlan Hill e-mail dated 21<sup>st</sup> July 2021 are noted. The residential properties which could potentially be subject to loss of daylight, sunlight or overshadowing have been identified and lie to the south and south east of the development site on Deansgate (No.1 Deansgate), Blackfriars (Britannic Buildings) Victoria Bridge Street (parts of North Tower). It is noted that the initial analysis of impacts which compares the baseline (current impacts vs the proposed development) concludes that they are not of a level which would require an assessment as part of the ES.

On the basis of the summary of impacts and conclusions within the above e-mail dated 21<sup>st</sup> July 2021 I accept that Sunlight, Daylight and Overshadowing impacts can be scoped out of the ES provided that a Report which supports these conclusions forms part of the supporting documents to the planning application. You will need to agree the scope and format of that Report with us prior to submission however.

## **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:

Contrary to the scoping report whilst the site is mainly located within Flood Zone 1 (indicating a less than 1 in 1,000 annual probability of flooding) the western boundary and south western portion of the site is situated within Flood Zone 3 a high probability of flooding of 1 in 100 or greater (with further Flood Zone 2 (a medium probability of flooding of between 1 in 100 and 1 in 1,000 years) encroachment within the central portion of the site). The site is at Very Low risk with regards to pluvial flooding. The western extent of the site is located within an area at risk from flooding from reservoirs. This discrepancy needs to be picked up within the FRA and Drainage Strategy to be submitted to accompany the submission.

Discharge point or rate has not been agreed by LLFA – nothing has been presented to them yet and this claim should be removed from any documents supporting the planning application.

Aspects of the proposal, such as discharge, will be assessed by the LLFA for environmental impact in terms of pollution and flood risk, but this does not necessitate attention in the ES, provided that a flood risk assessment and drainage strategy is provided in support of the planning application.

The Flood Map for Rivers and Sea can be viewed at: <http://maps.environment-agency.gov.uk/>.

The area is situated within the Manchester Trafford Critical Drainage Area (CDA) 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](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.

## **Noise and Vibration**

The comments within your scoping report are noted. The Report indicates that the proposed development is to be mixed use residential accommodation.

The submitted Acoustic Assessment will need to include the following details and considerations:

- I. Internal noise levels need to meet our criteria set out in MCC's Planning Noise Guidance document (included in the link below) and consider any noise transfer from ground floor retail proposals along with the restrictions in the low frequency octave bands (63Hz and 125Hz). The location of service risers and liftshafts and sound transmission paths (structural columns and pillars for example) will need assessment and ideally not located next to any habitable rooms (bedrooms specifically) and details of how these will be suitably insulated.
- II. Details of any necessary mechanical ventilation for the properties will need to be assessed as residents shall not need to rely on openable windows for comfort cooling in this location. These shall be selected and designed to ensure the internal noise limit is not exceeded when in use.
- III. Consideration to noise break out from the retail units will also need to be assessed and details of mitigation where required.
- IV. Any plant to be installed (included plant located behind louvres) will need to be selected and designed and subsequently be assessed against our criteria (including kitchen extraction)
- V. Construction noise impacts will be assessed and managed through measures in the CEMP which we can accept and noise and Vibration control measures including site noise and vibration levels will need to be agreed by MCC .

See link to Guidance below:

[http://www.manchester.gov.uk/info/500207/planning\\_and\\_regeneration/1962/additional\\_planning\\_guidance/3](http://www.manchester.gov.uk/info/500207/planning_and_regeneration/1962/additional_planning_guidance/3)

On the above basis I agree that Noise and Vibration can be scoped out of the ES.

## **Lighting**

The comments within your scoping report are noted. 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

## **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 to include the following details:

- An assessment for future receptors (ground floor receptors and upper floor residential) and include PM10 and PM2.5 as well as NO2.
- Assessment of fugitive dust emissions and mitigation measures during the demolition and construction phase. Reference to IAQM best practice measures shall be made and adopted through the development. Details of clean air filters should be provided where required along with their location on the building and maintenance / replacement requirements.

that Air Quality can be scoped out of the ES.

### **Ecology and nature conservation**

The comments within your scoping report are noted. The site currently comprises a vacant office building and areas of hardstanding which are 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 with the main potential impact being on the River Irwell 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.
- A Bat survey
- Details of measures to be taken to prevent any potential impacts of the development proposal on the adjacent River Irwell.

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 I 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

### **Waste**

The comments within your scoping report are noted. 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 be scoped out of the ES.

### **Accidents and disasters**

The comments within your scoping report are noted. It is agreed that the nature of the proposed development is not considered to pose risk of major accidents and/or disasters. 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.

## **Aviation**

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 if it exceeds the appropriate thresholds by an Aviation Risk Assessment

## **Transport and Access**

The comments within your scoping report and e-mail dated 06-08-21 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) and whilst it is accepted that vehicle trips may not exceed levels that require junction analysis - person trip surveys need to be included within this to assist with vehicular / pedestrian movements in the vicinity of the site. 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](mailto:Shelters@tfgm.com)

## **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 and Aviation.

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

### **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 comments within your scoping report are noted and are acceptable in terms of their consideration in the ES.

### **Townscape and Visual Impact**

The comments within your scoping report including the Receptors and Key views within Appendix II LVIA Figures are noted and are acceptable in terms of their consideration 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 comments within your scoping report (including the intention for consultation to be undertaken with MCC and Historic England to agree the scope of the Chapter) are noted and on this basis are acceptable in terms of their consideration in the ES.

### **Wind and microclimate**

The comments within your scoping report and letter of 21<sup>st</sup> July in relation to this topic area are noted and are acceptable in terms of their consideration in the ES.

### **Human Health**

The comments within your scoping report in relation to this topic area are noted and are acceptable in terms of their consideration in the ES.

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.

### **Climate Change**

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 broader 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.

### **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', written in a cursive style.

PP Julie Roscoe

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

Date: 02 July 2021  
Our ref: 358619  
Your ref: Renaissance Hotel



Angela Leckie  
Manchester City Council  
angela.leckie@manchester.gov.uk

Hornbeam House  
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**BY EMAIL ONLY**

T 0300 060 3900

Dear Angela Leckie

**Environmental Impact Assessment Scoping consultation (Regulation 15 (4) of the Town & Country Planning EIA Regulations 2017): Proposed Residential-led Development  
Location: Renaissance Hotel Site, Manchester**

Thank you for your consultation dated and received by Natural England on 28<sup>th</sup> June 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](mailto:consultations@naturalengland.org.uk), and we may be able to provide further information.

Yours sincerely

Amy Knafler  
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 (EcIA) have been developed by the Chartered Institute of Ecology and Environmental Management (CIEEM) and are available on their website.

EcIA is the process of identifying, quantifying and evaluating the potential impacts of defined actions on ecosystems or their components. EcIA 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 ([NPPE](#)) 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](http://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](http://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.

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

**Our ref:** SO/2021/121356/01-L01  
**Your ref:** EIA Scoping - Renaissance  
**Date:** 06 July 2021

**FAO: Angela Leckie**

Dear Madam

**TOWN AND COUNTRY PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2017 (AS AMENDED) (THE “EIA” REGULATIONS) - REQUEST FOR SCOPING OPINION:**

**CONSTRUCTION OF HIGH-RISE APARTMENT BUILDING FOR 303 RESIDENTIAL DWELLINGS (APPROXIMATELY 26-STOREY TOWER)**

**RENAISSANCE HOTEL, DEANS GATE. NATIONAL GRID REF: SJ8377798666**

Thank for requesting an Environmental Impact Assessment (EIA) scoping opinion from the Environment Agency (EA) for the development proposal detailed above. Referral for this EIA scoping was received on the 28<sup>th</sup> June 2021.

In order to inform our scoping opinion below, we have reviewed the following reporting provided by Manchester City Council (MCC) via email:

- EIA Scoping Report - Proposed Residential-led Development, Renaissance Hotel Site, Manchester. Prepared for and on behalf of Avison Young. Version: Final. Date: June 2021.

**Environment Agency Position**

Having reviewed the reporting detailed above, we acknowledge the determination by the planning agent that the proposal presented meets the threshold /criteria of ‘Schedule 2’ defined under The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 and therefore will be required to be subject to EIA in virtue of the anticipated number of dwellings (303 stated) to be created.

In line with the above, we can confirm that we have no objections to the proposed scope of the EIA, for matters within planning remit and focus of the EA. As detailed within Section 12 of the EIA report, we acknowledge that although scoped out the Environmental Statement (ES), the forthcoming planning application will be supported by the submission of separate Flood Risk Assessment (FRA), Drainage Strategy and Phase 1 Ground Investigation Report.

Although un-altering our scoping opinion above, we would like to highlight potential error for the flood zonation identified within the scoping report provided. At present the report notes under section 2.14 that the site is located ‘entirely within Flood Zone 1’. A review of our mapping indicates that the proposed development area is actually most likely to be situated within Flood Zone 2 with potential minor/partial encroachment into Flood Zone 3. However, the ‘Site Location Plan’ which should be provided under Appendix 1 of the report appears to be missing. It has therefore not been possible at this point in

Environment Agency  
Richard Fairclough House Knutsford Road, Warrington, WA4 1HT.  
Customer services line: 03708 506 506

[www.gov.uk/environment-agency](http://www.gov.uk/environment-agency)

Cont/d..

time to confirm whether this statement of Flood Zone 1 is false. The additional mapping provided under Appendix II and II shows different redline boundary extents for the proposed site and therefore cannot be used to draw a conclusions.

In virtue of the above, we would advise for the purpose of detailed development design, ensuring flood risk is appropriately managed and preparing the FRA for this development that the actual flood zonation of the site boundary is checked at the and confirmed earliest possible opportunity in order to avoid unforeseen delays and/or need to alter development design. Advice on FRA can be found via:

<https://www.gov.uk/guidance/flood-risk-and-coastal-change#site-specific-flood-risk-assessment-all>

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## **Informatives – General Advice / Guidance**

### Waste Water / Foul Drainage Disposal

Government guidance contained within the national Planning Practice Guidance (Water supply, wastewater and water quality – considerations for planning applications, paragraph 020) sets out a hierarchy of drainage options that must be considered and discounted in the following order:

1. Connection to the public sewer
2. Package sewage treatment plant (adopted in due course by the sewerage company or owned and operated under a new appointment or variation)
3. Septic Tank

Foul drainage should be connected to the main sewer. Where this is not possible, under the Environmental Permitting Regulations 2010 any discharge of sewage or trade effluent made to either surface water or groundwater will need to be registered as an exempt discharge activity or hold a permit issued by the Environment Agency, addition to planning permission. This applies to any discharge to inland freshwaters, coastal waters or relevant territorial waters.

Please note that the granting of planning permission does not guarantee the granting of an Environmental Permit. Upon receipt of a correctly filled in application form we will carry out an assessment. It can take up to 4 months before we are in a position to decide whether to grant a permit or not.

Domestic effluent discharged from a treatment plant/septic tank at 2 cubic metres or less to ground or 5 cubic metres or less to surface water in any 24 hour period must comply with General Binding Rules provided that no public foul sewer is available to serve the development and that the site is not within an inner Groundwater Source Protection Zone.

A soakaway used to serve a non-mains drainage system must be sited no less than 10 metres from the nearest watercourse, not less than 10 metres from any other foul soakaway and not less than 50 metres from the nearest potable water supply.

Where the proposed development involves the connection of foul drainage to an existing non-mains drainage system, the applicant should ensure that it is in a good state of repair, regularly de-sludged and of sufficient capacity to deal with any potential increase in flow and loading which may occur as a result of the development.

Where the existing non-mains drainage system is covered by a permit to discharge then an application to vary the permit will need to be made to reflect the increase in volume being discharged. It can take up to 13 weeks before we decide whether to vary a permit.

Further advice is available at:

[Septic tanks and treatment plants: permits and general binding rules](#)

### Surface Water Drainage / Sustainable Surface Water Management

Surface water run-off should be controlled as near to its source as possible through a sustainable drainage approach to surface water management (SuDS). SuDS manage surface water run-off by simulating natural drainage systems. Whereas traditional drainage approaches pipe water off-site as quickly as possible, SuDS retain water on or near to the site. As well as reducing flood risk, this promotes groundwater recharge, helps absorb diffuse pollutants, and improves water quality. Ponds, reedbeds and seasonally flooded grasslands can also be particularly attractive features within public open spaces.

SuDS involve a range of techniques including soakaways, infiltration trenches, permeable pavements, grassed swales, green roofs, ponds and wetlands. As such, virtually any development should be able to include a scheme based around these principles. In doing so, they'll provide multiple benefits and will reduce costs and maintenance needs.

Approved Document Part H of the Building Regulations 2010 establishes a hierarchy for surface water disposal, and encourages a SuDS approach. The first option for surface water disposal should be the use of SuDS, which encourage infiltration such as soakaways or infiltration trenches. In all cases, it should be established that these options are feasible, can be adopted and properly maintained and would not lead to any other environmental problems. For example, using soakaways or other infiltration methods on contaminated land carries groundwater pollution risks and may not work in areas with a high water table. Where the intention is to dispose to soakaway, these should be shown to work through an appropriate assessment carried out under Building Research Establishment (BRE) Digest 365.

Further information on SuDS can be found in:

- the CIRIA C697 document SuDS manual
- HR Wallingford SR 666 Use of SuDS in high density developments
- CIRIA C635 Designing for exceedance in urban drainage – good practice
- the Interim Code of Practice for Sustainable Drainage Systems – the Interim Code of Practice provides advice on design, adoption and maintenance issues and a full overview of other technical guidance on SuDS

### Dewatering / Licence Requirements

Dewatering is the removal/abstraction of water (predominantly, but not confined to, groundwater) in order to locally lower water levels near the excavation. This can allow operations to take place, such as mining, quarrying, building, engineering works or other operations, whether underground or on the surface.

The dewatering activities on-site, if required for creation of basement structures / foundations, could have an impact upon local wells, water supplies and/or nearby watercourses and environmental interests.

This activity was previously exempt from requiring an abstraction licence. Since 1 January 2018, most cases of new planned dewatering operations above 20 cubic metres a day will require a water abstraction licence from us prior to the commencement of dewatering activities at the site.

Dewatering requirements for each plot cannot be viewed in isolation.

[More information is available on gov.uk: https://www.gov.uk/guidance/water-management-apply-for-a-water-abstraction-or-impoundment-licence#apply-for-a-licence-for-a-previously-exempt-abstraction](https://www.gov.uk/guidance/water-management-apply-for-a-water-abstraction-or-impoundment-licence#apply-for-a-licence-for-a-previously-exempt-abstraction)

#### Piling / Foundation Methodology Selection

Piling or other foundation designs using penetrative methods can result in risks to potable supplies from, for example, pollution/turbidity, mobilising contamination, drilling through different aquifers and creating preferential pathways.

In virtue of the above, an appropriate piling/foundation methodology for the development proposal should be identified and clearly detailed as part of any subsequent planning submission / evidence. The approach selected should be supported / presented within by a risk assessment report providing sufficient justification for the approach identified. To further assist with this matter we would recommend referring to '[The Environment Agency's approach to groundwater protection](#)'.

--

Please forward a copy of the informatives above to the planning agent and notify them on the flood zonation discrepancy detailed. Should you have any queries or questions, 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](mailto:andy.davies1@environment-agency.gov.uk)



Historic England

Ms Angela Leckie  
Manchester City Council  
Planning  
PO Box 532  
Town Hall  
MANCHESTER  
M60 2LA

Direct Dial: 0161 2421442

Our ref: PL00751649

8 July 2021

Dear Ms Leckie

Re: RENAISSANCE HOTEL ENVIRONMENTAL IMPACT ASSESSMENT (EIA)  
SCOPING REPORT

Thank you for your letter of 28<sup>th</sup> June 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. These have been identified in section 7.24 of the submitted scoping report, and we are content that this, along with the cartographic representation in Appendix 4, has fully understood the heritage context of the site.

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) <<http://www.heritagegateway.org.uk>>) and relevant local authority staff.

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



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

Telephone 0161 242 1416  
[HistoricEngland.org.uk](http://HistoricEngland.org.uk)



*Historic England is subject to both the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any Information held by the organisation can be requested for release under this legislation.*



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.

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.

Given the number of designated heritage assets within the area, we welcome the fact that the applicant has engaged in early discussions with ourselves, and we are confident that they understand the key sites and setting issues which will need to be addressed within the EIA.

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  
E-mail: [richard.broadhead@historicengland.org.uk](mailto:richard.broadhead@historicengland.org.uk)





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**Salford**  
MANCHESTER

Greater Manchester Archaeological Advisory Service  
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M5 4WX

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

Date: 13<sup>th</sup> July 2021

Dear Angela,

**Archaeological Consultation: The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended) (the "EIA" Regulations) – Request for Scoping Opinion - Renaissance Hotel**

Thank you for consulting GMAAS on this EIA Scoping Opinion Request.

The consultation has been submitted with an EIA Scoping Report (dated June 2021) prepared by Avison Young. Chapter 12 addresses issues held to be insignificant for the purposes of the EIA, including Archaeology (paragraph 12.10). The report observes that having undergone development throughout the 20<sup>th</sup> century, any archaeological remains beneath the site will have been either removed, truncated or destroyed. On this basis the subject has been scoped out of the EIA.

Having rapidly reviewed information on the Historic Environment Record, and having spoken with the archaeological consultant associated with the scheme, GMAAS notes that areas of former archaeological interest were severely impacted upon or completely removed by 20<sup>th</sup> century activity within the site. A small pocket that still holds potential for 19<sup>th</sup> century archaeological remains is located in the south-west corner of the development site and in the central western part of the site alongside the Irwell – but these will not be impacted by development works.

On this basis GMAAS agrees with the conclusions of the Scoping Report and recommends that archaeology is scoped out of the EIA.

Yours sincerely,

**Ben Dyson BA MLitt ACIfA**  
Senior Planning Archaeologist  
Greater Manchester Archaeological Advisory Service  
Tel: ~~0161 295 6917~~ / 07851265250



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**AGMA**  
ASSOCIATION OF  
GREATER MANCHESTER  
AUTHORITIES

## RE: Consultation on Request for Scoping Opinion - Renaissance Hotel Site

Lynda Griffin <Lynda.Griffin@tfgm.com>

Mon 28/06/2021 16:16

To: Angela Leckie <angela.leckie@manchester.gov.uk>

Cc: Alan Lowe <Alan.Lowe@tfgm.com>; Andrew Charnock <Andrew.Charnock@tfgm.com>; Darren Embury <Darren.Embury@tfgm.com>; eplanner@metrolink.co.uk <eplanner@metrolink.co.uk>; Landuse <Landuse@tfgm.com>; Liam O'Shaughnessy <Liam.O'Shaughnessy@tfgm.com>; Projects@metrolink.co.uk <Projects@metrolink.co.uk>; Rapid Transit Development <rapidtransit.development@tfgm.com>

Angela,

### RE: Scoping Opinion Request – Renaissance Hotel Site, Manchester

The location of the proposed development is remote from Metrolink and we therefore have no comments to make from a Metrolink perspective in respect of this Scoping opinion request.

Regards

Lynda

Lynda Griffin

Approvals and Consents Manager  
Metrolink  
Transport for Greater Manchester

2 Piccadilly Place, Manchester M1 3BG

Mobile 07901220488  
Office fax 0161 244 1316  
[www.tfgm.com](http://www.tfgm.com)

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## Fw: EIA Scoping Opinion Request - Renaissance Hotel

Planning <Planning@manchester.gov.uk>

Mon 28/06/2021 14:06

To: Angela Leckie <angela.leckie@manchester.gov.uk>

Regards

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

Location address: Level 6 Town Hall Extension, Manchester M2 5DB

Tel: 0161 234 4516

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**From:** Planning Liaison <Planning.Liaison@uuplc.co.uk>

**Sent:** 28 June 2021 14:01

**To:** Planning <Planning@manchester.gov.uk>

**Subject:** RE: EIA Scoping Opinion Request - Renaissance Hotel

Dear Sir / Madam,

In response to 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](mailto:Planning.Liaison@uuplc.co.uk)

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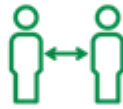
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common surfaces



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COUGH

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**From:** Planning [mailto:Planning@manchester.gov.uk]  
**Sent:** 28 June 2021 11:04  
**To:** Planning Liaison <Planning.Liaison@uuplc.co.uk>  
**Subject:** Fw: EIA Scoping Opinion Request - Renaissance Hotel

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Planning, Building Control & Licensing  
Growth & Development Directorate  
Postal address: Manchester City Council, P O Box 532, Town Hall, Manchester M60 2LA  
Location address: Level 6 Town Hall Extension, Manchester M2 5DB  
Tel: 0161 234 4516

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**From:** Planning  
**Sent:** 28 June 2021 10:58  
**To:** Angela Leckie <[angela.leckie@manchester.gov.uk](mailto:angela.leckie@manchester.gov.uk)>  
**Subject:** EIA Scoping Opinion Request - Renaissance Hotel

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

### **Renaissance Hotel**

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 is attached, which sets out what they believe the scope of the Environmental Impact Assessment (EIA) should be.

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 [angela.leckie@manchester.gov.uk](mailto:angela.leckie@manchester.gov.uk) no later than 19 July 2021.

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  
Location address: Level 6 Town Hall Extension, Manchester M2 5DB  
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