

OVG Manchester:

Appendix 2.2 – EIA Screening and Scoping Opinion



**MANCHESTER
CITY COUNCIL**

Julie Roscoe
Director of Planning, Building
Control and Licensing

PO Box 532
Town Hall
Manchester M60 2LA

Mr John Cooper
Deloitte LLP
PO Box 500
2 Hardman Street
Manchester
M60 2AT

Contact Miss Jennifer Atkinson
Tel 0161 234 4517
Fax 0161 274 0014
Email' j.atkinson@manchester.gov.uk

15 January 2020

Our reference JA/DMN

Dear Mr Cooper

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

SCOPING REQUEST UNDER PART 4 REGULATION 15(1)

'PROJECT BRADFORD' MANCHESTER ("THE PROPOSED DEVELOPMENT")

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

Thank you for your request dated 26 November 2019 for a scoping opinion at the above site and your agreement to an extension of time to respond until 17 January 2020

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 – Project Bradford, Manchester November 2019 FINAL*' prepared by yourselves on behalf of the Applicant OVG Europe 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 will be submitted with the subsequent planning application made in respect of the Proposed Development.

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

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

Your report of the 26 November 2019 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

- Air quality,
- Ground Conditions;
- Socio-economic,
- Lighting,-
- Noise and Vibration,
- Townscape and Visual Impact,
- Traffic and Transport,
- Water Quality, Drainage and Flood Risk, and
- Wind Microclimate

Scoped out

- Agricultural circumstances,
- Archaeology;

- Aviation,
- Built Historic Environment,
- Climate Change,
- Daylight and Sunlight;
- Ecology;
- Television, FM Radio and DAB Reception,
- Human Health.

Below is a consideration of the scoping report for the Proposed Development and comments on the approach which you have outlined

CONSULTATIONS

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

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

- Historic England,
- Natural England;
- Environment Agency;
- The Coal Authority,
- Greater Manchester Ecology Unit (GMEU),
- Greater Manchester Archeology Advisory Service (GMAAS);
- Aerodrome Safeguarding at Manchester Airport;
- Transport for Greater Manchester (TfGM),
- Cadent Gas;
- United Utilities,
- Canal and Rivers Trust;
- City Council Highway Services,
- City Council Environmental Health,
- City Council Flood Risk Management,
- City Council Arborist,
- City Council works and skills,
- Design for Security at Greater Manchester Police

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

You are strongly recommended to consult further with consultees as appropriate throughout the 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 development site is approximately 4.46 hectares and is bounded by Sportcity Way to the north, Alan Turing Way to the East, Ashton Canal to the south and Joe Mercer Way to the west and is located in the Ancoats and Beswick ward of Manchester.

The site is located within the 'Regional Centre' and the 'Eastlands Strategic Employment Location' as outlined in the Manchester Core Strategy (2012). The area is a long term regeneration priority for the City Council with the Etihad Campus being the focus of regeneration activity as part of creating a thriving sport, leisure and recreation offer in this part of the City.

The site is rectangular in shape, with the exception of the inclusion of two access points connecting to Alan Turing Way to the north east and the Etihad Campus to the south. The site is currently used as an over spill surface level car park for the Etihad Stadium and has an estimated capacity for up to 500 car parking spaces.

The perimeter of the site contains informal, dense shrubbery and trees which are secured by a weld mesh fence. There are no existing buildings on the site and therefore no demolition is required to facilitate development.

To the south of the development site is the Etihad Stadium, associated concourse and ancillary buildings including the club shop and various food and drink outlets. Directly to the south of the development site is the Ashton Canal and towpath together with access to the 'Etihad Stadium' Metrolink stop.

Surface level car parks dominate the areas immediately to the north and North West of the development site together with a disused gas holder directly off Alan Turing Way. Philips Park, a Grade II Listed Park, lies to the east of the development site on the opposite side of Alan Turing Way along with medium to low rise residential accommodation and the Eastlands District Centre which provides an Asda Supermarket.

The site is located within a highly accessible location by a variety of public transport including Metrolink and bus. The site is also approximately 1.5 mile walk from Manchester City Centre. The site is well connected to a variety of cycle routes along Alan Turing Way and the Ashton Canal Towpath.

SENSITIVE RECEPTORS

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 (SBI) or special protection areas (SPA). The Ashton Canal which lies to the south of the site boundary is a non-statutory designated SBI which is given protection under national and local planning policy.

The site is located within Flood Zone 1 'a low probability of flooding' and is situated within the Manchester, Salford and Trafford Critical Drainage Area (CDA).

The development site is not located within a conservation area and there are no listed buildings on the site. However, there are 6 designated heritage assets within 250 metres of the site, these are:

- Ashton Canal Lock Keepers Cottage (Grade II);
- Ashton Canal Bridge number 9 (Grade II),
- Ashton Canal lock number 6 (Grade II),
- Ashton Canal lock number 7 (Grade II),
- Phillips Park (Grade II) and
- Phillips Park Cemetery (Grade II)

Residential properties lie to the east of the development site on the opposite side of Alan Turing Way. This consists of a residential apartment building and low rise residential accommodation.

PROPOSED DEVELOPMENT

I note from your scoping report that the Proposed Development is still at the feasibility stage of development and the final design, mix of uses and quantum of floorspace has not yet been finalised. The scoping report is therefore submitted based on a number of parameters. Should these parameters change, then a further scoping assessment should be undertaken if the scope of the ES needs to reflect this.

The Proposed Development consists of the construction of a new indoor arena (65,000sqm) within a building height of up to 40 metres AOD. These maximums could deliver a total capacity of up to 23,500 people. Whilst I note that it is not believed that this maximum capacity would be reached, it is proposed that it will be used as the most robust scenario basis for assessment in each of the technical chapters within the ES.

The layout of the building would be flexible in order to accommodate events of different nature and scale, which could include music, sport, performances, awards and other live entertainment. I note that events could be held during the day and evening, throughout the year.

I also note it is envisaged that the Proposed Development would accommodate supporting uses and functions including food and beverage units, retail and a potential microbrewery. I note it is proposed that no additional car parking would be created for the Proposed Development rather developing this site would displace existing overspill parking associated with the wider Etihad Campus.

New greenspace and public realm would be provided as part of the Proposed Development which would include improved access to the Ashton Canal and the introduction of external seating areas and terraces

I note the desire for a high quality façade and bespoke arena design together with the intention integrate LED technology within the fabric of the elevations

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

There is no discussion of alternatives within the scoping report as part of this consideration.

It is essential that the submitted ES includes a discussion of potential alternatives to the Proposed Development. This should consider any alternative alternatives in terms of design, technology, location, size and scale, and 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 so as to be comprehensible to the specialist and non-specialist alike. The ES should be concise with supporting technical information placed in appendices

Mitigation

Mitigation measures may fall into a range of categories namely.

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

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

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

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

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

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

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

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 be a collection of separate specialist chapters, but a comprehensive assessment of the environmental impacts of the proposed components of the wider scheme, and should account for how the identified impacts could be mitigated or avoided, or how suitable compensation could be provided to offset those effects.

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

ENVIRONMENTAL MATTERS TO BE SCOPED OUT OF THE ES

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

Agricultural Circumstances

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

Archaeology

The scoping report concludes that no further archaeological works are required as all archaeological interests have been dealt with as part of previous development activity in and around the development site. As a result, there will be no significant effects which would require consideration. I confirm that archaeology can be scoped out of

the ES provided the planning application is supported by an appropriate report which supports these conclusions

Aviation

The overall scale of the Proposed Development does not exceed the aviation safeguarding threshold resulting in no significant effects on the aviation environment. I therefore accept that aviation can be scoped out of the ES

Built Historic Environment

I note that there are a number of heritage assets in close vicinity to the development site and the Proposed Development has the potential to impact upon their setting. Such effects are, however, not anticipated to be significant for the purposes of the EIA Regulations. I accept that the built historic environment can be scoped out of the ES, however, the planning application should be supported by an appropriate heritage assessment which includes mitigation should this be required.

The canal network should, however, be regarded as a non-designated heritage asset within this heritage assessment

Climate Change

I consider climate change cannot be scoped out of the ES for the reasons set out below

Daylight and Sunlight

Due to the scale of the Proposed Development, the preliminary review of the likely effects relating to daylight, sunlight and overshadowing has revealed that there will be a negligible impact on adjacent properties together with there being an absence of dwellings in close proximity to the development site. I accept that a daylight, sunlight and overshadowing assessment is capable of being scoped out of the ES provided an appropriate report, including mitigation should this be required, accompanies any future planning application

Ecology

The 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 impact being on the Ashton Canal where there is the potential to enhance ecology and biodiversity in this area. I accept that an ecological assessment is capable of being scoped out of the ES and can instead form part of the supporting documents to the planning application

It should be noted should the planning submission be delayed beyond survey season 2021 then the survey would need to be revisited. It is noted the road access to the north and pedestrian access from south is included in the site boundary. Whilst these areas primarily include hard standing, there is landscape planting present off Alan Turing Way and the pedestrian route crossing the canal. These areas should be included within an ecology assessment

The scoping report makes reference to a woodland management plan. There does not appear to be any woodland within the site boundary. If the area of woodland management relates to the wider area, and includes areas of woodland adjacent to the canal, then this information should form part of the supporting documents to the planning application

Television, FM Radio and DAB Radio Reception

The preliminary review of the likely effects relating to television, FM Radio and DAB Radio Reception has revealed that the Proposed Development may result in some short term, temporary impacts during construction and operational phases of the development. I note the effects are likely to be localised and mitigation, subject to further consideration, is possible. It is considered that this will be effective and deliverable and therefore mitigate against any potential harm that may arise.

It is accepted that a television, FM Radio and DAB radio reception assessment is capable of being scoped out of the ES and form part of the supporting documents to the planning application.

Human Health

For the reasons set out below, I consider that human health cannot be scoped out of the ES.

Summary

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

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

ENVIRONMENTAL STATEMENT CHAPTERS - SPECIFIC COMMENTS ON THE TECHNICAL CONTENTS

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

Your scoping report advises that the ES will cover the following topic areas

- Air quality,
- Ground Conditions,
- Socio-economic,
- Lighting,-
- Noise and Vibration;
- Townscape and Visual Impact,
- Traffic and Transport,
- Water Quality, Drainage and Flood Risk, and
- Wind Microclimate

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 to the north east of Manchester City Centre. For planning purposes, the development site is located in the Regional Centre (policy EC3) and the Eastlands Strategic Employment Location (policy EC7) of 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

Air Quality

The comments within your scoping report are noted and are broadly acceptable in terms of their consideration in the ES

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

Potential construction effects should consider any impacts on air quality from the use of plant and equipment together with the impact from emissions from construction vehicles and construction workers vehicles in and around the development site

In addition, there should be consideration of potential odours from the Proposed Development and the likely impact on air quality. The applicant would need to decide on the most appropriate methodology for assessing this depending on the likelihood of the impact in this regard.

The scoping report refers to nearby receptors and includes the Rochdale Canal SSSI. In the list of nearby receptors, there appears to be no reference to the Ashton Canal which passes immediately to the south of the development site. The ES should consider both the Rochdale and Ashton Canals and their users as a sensitive receptor to construction dust and emissions from construction traffic together with any other relevant watercourse.

The likely impacts of air quality on climate change require consideration within this chapter of the ES. This should include consideration of the extent that the Proposed Development will contribute to greenhouse gas emissions, either through vehicles accessing the development during construction and the operation of the development, through to the wider operations of the development and running of the building. Consideration should be given to the impact that this will have on the local, regional and national context (if applicable)

Ground Conditions

The comments within your scoping report are noted and are broadly acceptable in terms of their consideration in the ES

The City Council, as Local Planning Authority, recommends that the ES must provide the following additional information in respect of ground conditions

The area of land that would be affected by the Proposed Development has been the subject of historical coal mining activity, there is the potential for this to pose risks to development as a result of the coal mining legacy features which may be present

A coal mining risk assessment will therefore be required to support this chapter of the ES. Records indicate that there are six recorded mine entries within 20 metres of the development site boundary. The site is also within an area of both recorded and unrecorded underground shallow coal mining. The findings of the risk assessment should be used to inform the layout of the Proposed Development together with identifying any other necessary mitigation measures.

As the development of this site could give rise to significant environmental effects on ground conditions, the full process of ground investigation, risk assessment, options, appraisals and preparation of a mitigation and remediation strategy will be needed to the planning application and to inform the supporting ES.

Mitigation and / or a remediation strategy will need to be developed to the stage where the environmental impacts of implementing the strategy can be assessed as part of the planning application process.

The planning application submission including the ES cannot be adequately informed by desk based assessment alone, and intrusive ground investigations (particularly in respect of the previous coal mining activity) will be required in order to inform the layout of the Proposed Development. Receptors for consideration in both the risk and impact assessments include human health, below ground culverts and groundwater, surface water and ecology.

The development site is elevated in relation to the canal corridor. Contamination and pollution from the development site have the potential to impact on the canal corridor. The ES should consider the impacts as a result of this on the canal as a sensitive receptor including consideration of any conceptual models and potential mitigation measures. Construction works in close proximity to the waterway have the potential to impact on users, in particular boaters using the navigation and passing through the lock flight or towpath users.

The ES should also consider the impacts of the construction work in close proximity to the waterway infrastructure which has the potential to affect the structural integrity of the waterway. Due to the canal being lower than the development site, it is essential that the structural integrity of the canal infrastructure is not put at risk as part of any development at the site, including excavations, earthmoving or vibrations from plant or machinery which could, in the worst case scenario, result in the failure of the canal.

Socio-Economic Impacts

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

The scoping report outlines the 'topic purpose' of this chapter of the ES as examining the impact of the Proposed Development on the current economic and social performance of the area. The 'spatial scope' states that the principal economic effect of the Proposed Development would be considered to be local and regional areas, as these represent the principal labour market catchment areas.

It is essential and appropriate that the socio-economic chapter considers the significance of the economic effects of the Proposed Development on a number of catchment areas including the immediate context, Manchester City Centre, any

associated impacts on the North West Region and the national context (where appropriate)

The significance of these impacts on existing and future businesses, uses and employees together with the tourism and leisure economies found within these locations, should be examined together with any cumulative impacts and effects

In particular, any significant impacts on other leisure uses/destinations (particularly those that share the same catchment area as the Proposed Development) should be examined. These include the Manchester Arena and the O2 Apollo in the Manchester City Centre, the M&S Bank Arena Liverpool in the North West Region and those found in the national context such as First Direct Arena Leeds, Arena Birmingham & Resort World Arena and any other national arena that could be judged to be affected by the Proposed Development. This would provide an understanding of current market conditions and trends which in turn would allow for an evaluation of the significance of the impacts of the Proposed Development on these existing destinations together with any other associated socio-economic effects

The likely sensitive receptors should be expanded to include local, regional and national supply chains which may be effected by the Proposed Development.

In terms of social value, the impact on local labour in both the regional centre, city wide and the North West requires consideration. This includes how local labour will be impacted through the construction and operational phases.

Light Spill

The comments within your scoping report are noted and are broadly acceptable in terms of their consideration in the ES

The City Council, as Local Planning Authority, recommends that the ES provides the following additional information in respect of light spill within this chapter of the ES

The residential properties along Alan Turing Way, canal corridor, the nearby listed buildings, Phillips Park and Alan Turing Way highway network are all considered to be the most sensitive receptors to the light spill from the Proposed Development

Whilst I note that the scoping report states that the light spillage within these areas is already high, the Proposed Development should be assessed in terms of how it would contribute to the level of illumination in the area

It is noted that the intention is to incorporate LED lighting into the façade of the building. The likely impacts of this should be considered in the ES particularly with regards to Phillips Park, the safety of those using Alan Turing Way and on the canal corridor. In terms of the later, the lighting to the canal corridor and its associated impacts need to be considered together with an associated impacts on the ecology of this area

Noise and Vibration

The comments within your scoping report are noted and are broadly acceptable in terms of their consideration in the ES

The City Council, as Local Planning Authority, recommends that the ES must provide the following additional information in respect of noise and vibration within this chapter of the ES

The ES should take into account the use of any plant and equipment, and assess the likely impacts as a result of this during the construction and operational phases

It is noted that the vibrations from piling are unlikely to cause any significant impacts given the relative distances to nearby residential receptors. This will need to be considered and evaluated through the ES. Impact on the canal corridor and infrastructure should also be considered within this assessment in order to determine any potential impacts from vibrations, plant and machinery during the construction phase given that vibrations could undermine the stability of associated infrastructure.

There are also likely to be wider impacts from noise in the wider area and potentially beyond from usage of pedestrian routes to and from the development site. This requires consideration including any mitigation and management measures. There is also likely to be cumulative impacts from noise if events are being held simultaneously across the Etihad Campus and within the City Centre. The likely impacts of this should be considered and evaluated within the ES.

The canal corridors are also likely to be impacted on as a result of noise from the Proposed Development. The canal corridors are tranquil spaces and contribute to the health and wellbeing of nearby residents and users (boaters, commuters, leisure and recreational users of the towpath). These spaces are likely to experience an increase in usage as a result of the Proposed Development and the impact from noise and disturbance on the canal corridor, as a sensitive receptor, is required to be considered and evaluated as part of the ES.

Noise outbreak from the building during the operational phase of the Proposed Development will need to be considered within the ES and mitigation identified where necessary. The cumulative impact from events at the Etihad Campus will also need to be considered and evaluated as part of the ES. Entertainment noise will need to be included in the noise assessment along with the plant noise and the likely impacts of this considered and evaluated as part of the ES.

Townscape and visual impact

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

The City Council, as Local Planning Authority, recommends that the ES provides the following additional information in respect of townscape and visual impact within this chapter of the ES.

The ES should consider any likely wider impacts on particular views further south of the development site from the Piccadilly railway line which has uninterrupted and elevated views towards the Etihad Campus.

The ES should also ensure that the sensitive visual receptors which are likely to be affected by the Proposed Development are appropriately captured within the assessment. The canal corridor is proposed to be considered at viewpoint 5 and 6. It is not considered that these would give a full indication of the potential visual impact on this sensitive receptor. Additional viewpoints should be added in order to capture further along the canal towpath from the listed lock flight as the impact may vary significantly subject to the various aspects along this route. In addition, viewpoints should be provided from locks 5, 6 and 7 on the Ashton Canal.

It is essential that the ES considers the cumulative impacts of other developments in order to fully understand the likely impacts of the Proposed Development. Viewpoints 1

and 3 need to show the cumulative impact of the north stand of the Etihad Stadium being developed in line with an extant planning permission

Traffic and Transport

The comments within your scoping report are noted and are broadly acceptable in terms of their consideration in the ES

The City Council, as Local Planning Authority, recommends that the ES provides the following additional information in respect of traffic and transport within this chapter of the ES

Due to the scale of the Proposed Development, a full and comprehensive transport assessment (TA) will be required in order to inform this chapter of the ES. The baseline traffic assessment should specifically consider the effect of the Proposed Development on the capacity of the highway network in and around the development site. Given the potential for multiple large scale events across Manchester taking place at the same time, it is essential that the traffic assessment considers the cumulative impacts of events across the Etihad Campus together with events in the City Centre (for example at the Manchester Arena), FC United Football Club and the O2 Apollo

In terms of the geographical scope of the surrounding network and junctions assessment, the assessment boundary should be extended as follows

- Rochdale Road to the north,
- Ashton New Road, extending to the M60 in the east,
- Hyde Road to the south, and
- Entirety of the City Centre and the ring road.

The above baseline assessment should also be used to assess the construction impacts of the Proposed Development

In addition to the above a full multi modal model is required to identify what impacts the Proposed Development will have on trip generation, parking levels, public transport and sustainable modes. This should incorporate existing travel survey data undertaken by Manchester City Football Club (MCFC). It is essential that this model is realistic and suggests appropriate and deliverable mitigation measures where it is clear and necessary to make interventions to improve the safety, efficiency and capacity of the highway network and public transport and other infrastructure

The development site is situated within an existing controlled residents parking zone (RPZ). A review of the RPZ is required in the context of the impact of traffic arising from the Proposed Development including where current and new vehicles associated with the Proposed Development and wider Etihad Campus would park

Currently, the scoping report makes no reference to the potential extension and amendment to the existing Etihad Campus RPZ as part of mitigating the impacts of the Proposed Development

The potential construction and operational effects of the Proposed Development should include the impact of cycling as well as pedestrians

A Travel Plan document incorporating actions that are aimed at encouraging sustainable travel during both the construction and operational phases of the Proposed

Development is an essential component and the effects should be evaluated through the ES

The operational impacts on sustainable transport and routes is an essential part of the ES (for example bus, rail, tram, cycling and permeability/walking routes and any other infrastructure) The significance of the impacts as a result of the Proposed Development on the local context and City Centre is essential

In particular, reference should also be made with regards to the likely impacts on the canal towpath usage given it provides a direct, traffic free route to the site from the City Centre Existing evidence suggests that there is a significant uplift in usage of the canal towpaths when football matches are played at the Etihad Stadium As part of considering the likely impacts in this regard, consideration should be given as to whether the towpath is fit for purpose in order to safely accommodate the uplift in usage associated with the Proposed Development together with any cumulative impacts from usage across the Etihad Campus

Air quality, climate change and human health impacts should be measured within this chapter of the ES as part of the incorporation of measures from the travel plan and any other mitigation measures to support public transport and other infrastructure. This would also demonstrate that the car parking and the capacity of the highway network is not exacerbated beyond existing baseline conditions both within the regional and city centres, during the construction and operational phases of the Proposed Development

Water Quality, Drainage and Flood Risk

The comments within your scoping report are noted and are broadly acceptable in terms of their consideration in the ES

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

The River Medlock is a designated 'main river' which flows into a culvert within the development site boundary The route of the Medlock within culvert can be viewed using the Environmental Agency flood map (<https://flood-map-for-planning.service.gov.uk/>) Site investigations should be informed by a full structural survey to establish the existing culvert's condition, depth, size and location

Due to the scale of the Proposed Development, a full flood risk (FRA) assessment should be carried out The FRA should consider all sources of flooding, including surface water, establish the baseline flood risk using all available published sources and supplemented by site specific surveys where necessary. The impact of climate change should be considered together with further details on the culvert and an assessment of the risk of flooding in the instance of a partial or total collapse (including appropriate mitigation)

There are also areas within the north west of the development site that are at high risk of surface water flooding and changes in level may have an impact on that risk The Proposed Development is also within an area at medium to high susceptibility to groundwater flooding. It is essential that the ES considers how surface water from the Proposed Development will be captured, treated and disposed of both during the construction and operational phases

There is potential run off and discharge during the construction process which has the potential to impact on the canal, which could impact upon water quality

The ES and any strategy for surface water management during the operational phase, the Proposed Development needs to follow the drainage hierarchy

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

Presence of made ground on the site is suspected. Site investigations and percolation tests in line with BRE 365 Digest should be undertaken as part of ES to assess feasibility of infiltration into the ground as a method of surface water disposal.

Due to the presence of the River Medlock in culvert, if infiltration on the site is not possible, the ES should give consideration to the next discharging point for surface water which is the watercourse. Any works within or adjacent to the watercourse that would affect it would require consent from the Environment Agency.

Discharging surface water into the canal should not be assumed as appropriate. Given the change in levels between the site and canal and short 'pound' between locks, any discharge to the canal is not likely to be feasible. Any impacts on the canal from drainage or flood risk should be included within the ES as this could affect both water quality and quantity and have a wider impact on the canal network.

Surface water discharging into the sewer should be the last resort and requires the consent of United Utilities.

As part of the consideration of the most appropriate method for dealing with surface water, and in the interest of climate change, the City Council, as Local Planning Authority, strongly recommends the use of sustainable drainage systems (SuDS) as part of controlling surface water and not exacerbating existing conditions.

The ES should consider SuDS as a method to control surface water as close to its source as possible. Well designed sustainable drainage systems provide clear opportunities to

- Reduce the causes and impacts of flooding,
- Remove pollutants from urban run off at source,
- Combine water management with green space with benefits for amenity, recreation and wildlife

The ES should consider controlling surface water through the use of SuDS in the interest of climate change and the overall sustainability of the Proposed Development and reducing any likely significant impacts on the Regional Centre, City Centre and beyond.

Green roofs, green walls, tree planting and other forms of green infrastructure to allow for the adaption to climate change in heavily urbanised areas. This in turn will have ecological, biodiversity and air quality benefits which should be measured within the ES as part of the incorporation of such measures. This would also demonstrate that flood risk will not be increased elsewhere in both the regional and city centres, both during the construction and operational phases of the Proposed Development.

Where SuDS cannot be used, the City Council will require a detailed justification within the ES

Wind and Micro Climate

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

Human Health

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

Matters of air quality, transport and traffic, flood risk, wind microclimate, ground conditions, noise and vibrations, lighting 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

It is noted that the scoping report states that the Proposed Development will only have an impact on climate change during the operation phase of the development through the emission of greenhouse gases. However, the ES should consider the impact of the Proposed Development on climate change both through the construction and operational phases of the development and the significance of these impacts needs to be considered through a relevant chapter in the ES

Matters of air quality, transport and traffic, flood risk, wind microclimate, ground conditions 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 and use of renewable energy as part of promoting a low carbon development and reducing emissions and the likely environmental impacts of this.

FURTHER INFORMATION

The City Council, as Local Planning Authority, has undertaken a thorough consideration of the information contained within your scoping report together with providing comments from relevant statutory consultees. The issuing of this Scoping

Opinion does not preclude the City Council, as Local Planning Authority, from requesting further information at a later stage as the development proposals evolve or whilst a future planning application is being formally considered.

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

Yours sincerely



Julie Roscoe

Director of Planning, Building Control and Licensing

EIA Scoping Opinion - Project Bradford

From: **Diane Jackson**

Date: Fri, 20 Dec 2019 at 10:52

Subject: RE: EIA Scoping Opinion - Project Bradford

To:

Hi Jennifer,

Thank you for consulting with the aerodrome safeguarding authority for Manchester Airport on the proposed contents of the EIA for this development; we have no comments.

Kind Regards,

Diane

Diane Jackson

Group Aerodrome Safeguarding Officer

MAG, 3rd Floor, Olympic House, Manchester Airport, M90 1QX

www.magairports.com



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

Your Ref Project Bradford
Our Ref CRTR-PLAN-2019-28800
Friday 20 December 2019

Dear Ms Atkinson

Proposal: Environmental Impact Assessment (EIA) Screening and Scoping Report (the "Report") has been prepared in respect of the potential redevelopment of an existing surface level car park

Location: Land Bounded by Sportcity Way, Alan Turing Way, Ashton Canal and Joe Mercer Way, Manchester

Waterway: Ashton Canal

Thank you for your consultation on the Environmental Scoping Report.

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

The proposed development relates to a new arena to have a capacity of up to 23,500 people. The building would have a height up to 40m AOD. The arena would accommodate events such as sport, music, performance and live entertainment. Events may be held day or night and throughout the year. It would also contain additional uses and functions such as food & drink, retail units and a potential microbrewery.

The towpath side of the Ashton Canal forms the southern boundary of the site. The grade II listed lock number 6 is also adjacent to the site.

Topics to be Scoped Out

The Scoping report sets out that topics such as Archaeology; Built Historic Environment and Ecology would be scoped out of the Environmental Statement. The report notes that the planning application would still be accompanied by separate reports relating to these matters. Subject to this being the case, the Trust agree that these topics can be scoped out of the EIA.

The canal network should be regarded as a non-designated heritage asset within the heritage assessment. The grade II listed lock 5 to the west of the site; lock 6 adjacent to the site; and lock 7 with roving bridge to east of the site should all be considered and assessed in terms of physical and visual impact on views, setting and appearance. Any impacts to these heritage assets would need to be mitigated accordingly to avoid harm.

Canal & River Trust

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

We note the Ecology report makes reference to woodland management. There does not appear to be any woodland within the red line of the site as shown in Appendix 1. If the area for woodland management relates to the wider area, and includes area of woodland adjacent to the canal, then we would be interested to be consulted on the management proposals.

Topics to be Scoped In

Air Quality and Dust

The assessment sets out nearby receptors at paragraph 5.11 and includes the Rochdale Canal SSSI. There appears to be no reference to the Ashton Canal which passes immediately to the south of the site. We consider that the assessment should consider both the Rochdale and Ashton Canal and their users as a sensitive receptor to construction dust and in terms of emissions from construction traffic.

Ground Conditions

The site is elevated in relation to the canal corridor. Contamination and pollution would have a negative effect on the canal corridor. We ask that any contaminated land assessment and especially any mitigation considers the canal as a sensitive receptor and considered in any conceptual models.

This chapter should also consider ground conditions in terms of construction work in close proximity to the waterway infrastructure which could potentially adversely affect the structural integrity of the waterway. The canal is lower than the application site and it is essential that the structural integrity of the canal infrastructure is not put at risk as part of any development proposal, including excavations, earthmoving or vibrations from plant or machinery which could, in the worst case scenario, result in the failure of the canal.

Land stability and the consideration of the suitability of development with regard to ground conditions are material planning considerations as set out in paragraphs 170 (e) and (f) and 178 of the National Planning Policy Framework (NPPF) and that the responsibility for securing a safe development in terms of land stability rests with the developer (para 179). This is the subject of more detailed discussion in the National Planning Practice Guidance (PPG).

Works in the vicinity of the waterways should consider the waterways users as receptors, in particular boaters using the navigation and passing through the lock flight (approx. 20 mins a lock) or towpath users.

Light Spill

The canal is considered to be the main sensitive area as noted at paragraph 5.73. The canal corridor is already partially lit. Any lighting would not need to balance

It is already lit but any way to ensure the situation for ecology is not worsened would be welcomed.

Noise and Vibration

Although passing through urban areas, the canal corridors are tranquil spaces and contribute to the health and wellbeing of the nearby residents and users (boaters, commuters, leisure and recreational users on the towpath). These spaces need to be protected from intrusive forms of development and any potential impacts such as noise should be kept to a minimum. We would ask that the canal and its users are included as a noise sensitive receptor in this assessment.

In terms of vibration the canal infrastructure and in particular the potential impact on the canal should be considered as receptors susceptible to vibration from plant and machinery during the construction phase. Vibrations could undermine the stability of the canal infrastructure.

Canal & River Trust

Fradley Junction, Alrewas, Burton-upon-Trent, Staffordshire DE13 7DN

T 0303 040 4040 **E** canalrivertrust.org.uk/contact-us **W** canalrivertrust.org.uk

Townscape and Visual Impact

The redevelopment of the site provides an opportunity to provide a positive waterside frontage and engage/interact with the canal corridor. The scale, material, quality and character of the new development will have a crucial relationship with the existing canals.

The canal corridor is proposed to be considered at viewpoint 5 and 6, but these would not give a full indication of the potential visual impact. The Trust consider that additional viewpoints should be provided along canal towpath from the listed lock flight, as the impact may vary significantly subject to the various aspects along this route. Viewpoints should be provided from locks 5, 6 and 7 on the Ashton Canal.

Traffic and Transport

The chapter appears to be more focused on construction traffic. Rather than traffic and transport generation associated with the development when operational.

We consider that the assessment should also consider post-construction impacts and sustainable transport routes to the site, for example it is likely that the canal towpath would see a significant increase in usage as a direct traffic-free route to the site from the City Centre. Although we would welcome the use of the canal towpath as a sustainable transport route. The development would need to ensure that the towpath is fit for purpose to safely support an uplift in usage associated with the development. We would be happy to advise on this matter.

We have towpath usage data showing the significant uplift in usage of the canal towpaths when there are matches played at the Etihad Stadium.

Water Quality, Drainage and Flood

The details of how any surface water is to be captured, treated and disposed of should be considered. Regard would need to be given to potential run-off and discharge from any construction compounds to the canal, especially given the site is elevated, which may impact water quality.

In terms of surface water drainage, the Trust is not a land drainage authority and such discharges to our waterways are not granted as of right – where they are granted they will be subject to the completion of a commercial agreement. Given the change in levels between the site and canal and short 'pound' between locks, such a discharge to the canal may not be feasible in any case.

Any impacts on the canal from drainage or flood risk should be included within the EIA as this could affect both water quality and quantity and have a wider impact on our network.

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

Yours sincerely,

Tim Bettany-Simmons MRTPI
Area Planner

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

Canal & River Trust

Fradley Junction, Alrewas, Burton-upon-Trent, Staffordshire DE13 7DN

T 0303 040 4040 **E** canalrivertrust.org.uk/contact-us **W** canalrivertrust.org.uk



The Coal
Authority



INVESTOR IN PEOPLE



200 Lichfield Lane
Berry Hill
Mansfield
Nottinghamshire
NG18 4RG

Tel: 01623 637 119 (Planning Enquiries)

Email: planningconsultation@coal.gov.uk

Web: www.gov.uk/coalauthority

For the Attention of: J Atkinson – Case Officer
Manchester City Council

[By Email: planning@manchester.gov.uk]

19 December 2019

Dear J Atkinson

EIA SCOPING OPINION: PROJECT BRADFORD

**Redevelopment of an existing surface level car park; Land Bound By Sportcity Way
Alan Turing Way, Ashton Canal, And Joe Mercer Way, Manchester**

Thank you for your notification of 04 December 2019 seeking the views of the Coal Authority on the EIA Scoping Opinion. It is understood that the applicant will be seeking full planning permission for a new indoor arena, together with associated retail and leisure facilities, back-of-house and support functions, public realm, cycle parking, access and associated works.

The Coal Authority is a non-departmental public body sponsored by the Department of Business, Energy & Industrial Strategy. As a statutory consultee, The Coal Authority has a duty to respond to planning applications and development plans in order to protect the public and the environment in mining areas.

The Coal Authority Response:

The Coal Authority records indicate that within the area of development there are 6no. recorded mine entries within, or within 20m, of the site boundary. The site is also within an area of both recorded and historic unrecorded underground shallow coal mining.

We note that the submission is accompanied by an Environmental Impact Assessment (EIA) Screening and Scoping Report (November 2019) which identifies that ground conditions will be considered by Buro Happold. We would therefore expect this chapter of the EIA, as part of any formal EIA submitted, to form the Coal Mining Risk Assessment for

the site and to consider in detail the potential risks posed to the development by the significant coal mining legacy features present within the site.

As full planning would be required, any layout will need to be informed by the findings of intrusive site investigations, specifically in relation to the recorded mine entries. The Coal Authority is of the opinion that building over the top of, or in close proximity to, mine entries should be avoided wherever possible, even after they have been capped, in line with our adopted policy:

<https://www.gov.uk/government/publications/building-on-or-within-the-influencing-distance-of-mine-entries>

I hope this is helpful but please do not hesitate to contact me if you would like to discuss this matter further.

Yours sincerely

Deb Roberts *M.Sc. MRTPI*
Planning Liaison Manager

General Information for the Applicant

Under the Coal Industry Act 1994 any intrusive activities, including initial site investigation boreholes, and/or any subsequent treatment of coal mine workings/coal mine entries for ground stability purposes require the prior written permission of the Coal Authority, since such activities can have serious public health and safety implications. Failure to obtain permission will result in trespass, with the potential for court action. In the event that you are proposing to undertake such work in the Forest of Dean local authority area our permission may not be required; it is recommended that you check with us prior to commencing any works. Application forms for Coal Authority permission and further guidance can be obtained from the Coal Authority's website at:

<https://www.gov.uk/get-a-permit-to-deal-with-a-coal-mine-on-your-property>

Any form of development over or within the influencing distance of a mine entry can be dangerous and raises significant safety and engineering risks and exposes all parties to potential financial liabilities. As a general precautionary principle, the Coal Authority considers that the building over or within the influencing distance of a mine entry should wherever possible be avoided. In exceptional circumstance where this is unavoidable, expert advice must be sought to ensure that a suitable engineering design is developed and agreed with regulatory bodies which takes into account of all the relevant safety and environmental risk factors, including gas and mine-water. Your attention is drawn to the Coal Authority Policy in relation to new development and mine entries available at: <https://www.gov.uk/government/publications/building-on-or-within-the-influencing-distance-of-mine-entries>

Disclaimer

The above consultation response is provided by The Coal Authority as a Statutory Consultee and is based upon the latest available data on the date of the response, and electronic consultation records held by The Coal Authority since 1 April 2013. The comments made are also based upon only the information provided to The Coal Authority by the Local Planning Authority and/or has been published on the Council's website for consultation purposes in relation to this specific planning application. The views and conclusions contained in this response may be subject to review and amendment by The Coal Authority if additional or new data/information (such as a revised Coal Mining Risk Assessment) is provided by the Local Planning Authority or the Applicant for consultation purposes.

Manchester City Council
PO Box 532
Manchester
Lancashire
M60 2LA

Our ref: SO/2019/119900/01-L01
Your ref: Project Bradford
Date: 23 December 2019

FAO: Anthony Moore

Dear Mr Moore

EIA SCOPING OPINION - CONSTRUCTION OF A NEW INDOOR ARENA - LAND BOUND BY SPORTCITY WAY TO THE NORTH, ALAN TURING WAY TO THE EAST, ASHTON CANAL TO THE SOUTH, AND JOE MERCER WAY TO THE WEST, IN THE WARD OF ANCOATS AND BESWICK, MANCHESTER

Thank you for requesting an Environmental Impact Assessment (EIA) scoping opinion from the Agency on the above development proposal. This request was received in office on the 4th December 2019.

Documentation Reviewed:

- Environmental Impact Assessment (EIA) – Screening and scoping report. Project Bradford, Manchester. Prepared by Deloitte Real Estate. [November 2019] Appendix 1-7.

Environment Agency Position

Having reviewed the report outlined above, we can confirm agreement with the proposed scope of the proposed Environmental Statement (ES) for matters within the remit of the Environment Agency. To assist in preparation of the ES and any relating planning submission, we would like to offer the following advice:-

Flood Risk Assessment / Flood Risk Activity

The River Medlock a designated 'main river' flows in culvert within the development site boundary. The route of the Medlock within culvert can be viewed via our flood map for planning: <https://flood-map-for-planning.service.gov.uk/>. As part of site investigations, we would recommend that the applicant to carry out a full structural survey to establish the existing culvert's condition, depth, size and location.

Our asset performance team (Asset ID 62861) carry out visual inspection once a year of 'main river' infrastructure; the last inspection was carried out on 08/10/2018. The primary purpose of this inspection is to check that there is no visual defects and no blockages. Any defects detected would be reported to the landowner at the time of the investigation being undertaken.

Further to the above, we also recommend that the Flood Risk Assessment (FRA), required as part of any future planning submission, includes further details on the culvert and assesses risk of flooding in the instance of a partial or total collapse.

Environment Agency
Richard Fairclough House Knutsford Road, Warrington, WA4 1HT.
Customer services line: 03708 506 506
www.gov.uk/environment-agency

Cont/d..

Some development activities may require a permit under the Environmental Permitting (England and Wales) Regulations 2016 from the Environment Agency for any proposed works or structures, in, under, over or within eight metres (either side of the center line) of the River Medlock, designated a 'main river'. This was formerly called a Flood Defence Consent. Some activities are also now [excluded](#) or [exempt](#). A permit is separate to and in addition to any planning permission granted. The grant of planning permission does not necessitate the grant of a permit or vice versa.

Further details and guidance on Flood Risk Activity Permits (FRAP) are available on the GOV.UK website: <https://www.gov.uk/guidance/flood-risk-activities-environmental-permits>.

The Environment Agency has discretionary powers to carry out maintenance works on the channels of "main river" watercourses to remove blockages and ensure the free flow of water. Information on riparian landowner's rights and responsibilities can be found at <https://www.gov.uk/guidance/owning-a-watercourse>.

Water Framework Directive / Ecology

The prospective Project Bradford development site adjoins two WFD waterbodies, Ashton Canal (Ref: GB71210219) and River Medlock (Ref:GB112069061152), both of which are failing their ecological objectives, as well as being important green infrastructure assets.

We note that ecology is to be omitted from the ES, based on preliminary ecological assessment of site (TEP, June 2019), but that it has been assured that ecology will still be integrated into the future scheme development, in terms of identifying opportunities to enhance biodiversity.

Based on the proximity of these ecological receptors and key ecological networks, we welcome the addition of any further clarification as to how the waterbodies noted will be protected from any potential deleterious effects associated with both the construction and operational elements of development proposal. To assist in this matter, we would recommend that beneficial effects could be provided through provision of the following:

- the provision undeveloped buffers along both waterbodies
- the expansion and enhancement of the existing greenspace corridor along Ashton Canal
- the inclusion of a multifunctional sustainable urban drainage system associated with any new site surface water drainage

The provision of the features noted above would provide greater assurance that new development will meet requirements of the National Planning Policy Framework and the emerging Greater Manchester Spatial Framework environmental objectives (<https://www.greatermanchester-ca.gov.uk/what-we-do/housing/greater-manchester-spatial-framework/gmsf-full-plan/>).

--

Please forward a copy of this letter to the site developer. Should you have any queries regarding this response, then please do not hesitate to contact me.

Yours sincerely

Mr Andy Davies
Sustainable Places Advisor

Direct dial
Direct e-mail

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

(Flood Risk Management response – 13th December 2019)

The proposed development is situated within Flood Zone1. The Flood Map for Rivers and Sea can be viewed at: <http://maps.environment-agency.gov.uk/>.

There are areas within the northwest of the site that are at high risk of surface water flooding and any changes in level on this site might have an impact on that risk. The Flood Map for Surface Water can be viewed at: <http://maps.environment-agency.gov.uk/>.

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

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

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

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

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

River Medlock in culvert runs along the north and west of the site and if infiltration on site is not possible, the next discharging point for surface water should be this watercourse. Any works within or adjacent to the watercourse that would affect it would require consent from the Environment Agency.

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

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

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

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

The Council is encouraging use of green roofs, green walls, tree planting and other forms of green infrastructure to allow for the adaptation to climate change in heaving urbanised area. New Green infrastructure provision should be an exemplar of best practice and innovation in terms of both its design and management. Greater Manchester is the first city-

region in the UK to develop a Natural Capital Investment Plan designed to encourage investments in natural capital that deliver financial as well as social returns.

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

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

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

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

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

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

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

Consultation on Scoping Opinion for Project Bradford

1 message

From: **Redhead Norman**

Date: Fri, 3 Jan 2020 at 08:44

Subject: Consultation on Scoping Opinion for Project Bradford

To: Jennifer Atkinson

Jennifer

Thank you for consulting GMAAS on this. The EIA Screening and Scoping Report summarises previous archaeological investigations under Sections 3.8 to 3.18. The report concludes that no further archaeological work is required as all archaeological interests have been dealt with in previous schemes. GMAAS concur with these comments.

Kind regards

Norman



Norman Redhead BA MCifA FSA

Heritage Management Director
(Archaeology) Greater Manchester
Archaeological Advisory Service School of
Science, Engineering & Environment
Room LG20, Peel Building, Peel Park Campus
University of Salford, Salford, M5 4WX
T: /
www.salford.ac.uk



Project Bradford - Scoping Report

1 message

From: **David Dutton**
Date: Mon, 16 Dec 2019 at 12:02
Subject: Project Bradford - Scoping Report
To:

Hi Jennifer

Thank you for consulting the GMEU

Summary

I have no objection to the scope of the ecological survey. The main issue is proximity to the Ashton Canal. Other issues are restricted to nesting birds, invasive species and achieving net gain.

Validity of Survey

Surveys occurred in 2019. Given the negligible to low value of the site, I am happy for it to be regarded as valid as part of any planning application unless submission is delayed beyond survey season 2021.

It does not however appear to have covered the entire site within the red edge. The areas omitted however is the road access to the north and what I assume is pedestrian access from the south of the site. Aerial photograph indicates these areas are primarily hard standing, though additional landscape planting is present off Alan Turing Way and the pedestrian route crosses the canal. As part of any planning application we would expect an addendum to the submitted application covering these areas.

Protected Species

The only likely species theoretically possible is little ringed plover, recorded previously from the site in 2012 as having bred. This species is opportunist on nesting site and the site is theoretically suitable. Surveys found no evidence of this species in 2019. To mitigate against potential return a standard nesting bird condition can be applied to include ground nesting as well as nesting in scrub and trees.

The only other theoretical species is floating water-plantain. We accept however that this species now appears to be absent from the Ashton Canal and any theoretical risk covered through measures to protect the canal during and post construction from negative impacts.

Proximity to Ashton Canal SBI

There will be a risk of indirect impacts during and post development primarily from drainage and potentially from external lighting and possible direct impacts if works are proposed to the existing bridge over the canal. These risks can be avoided through appropriate design and conditions.

The development also provides an opportunity to enhance the functionality of the canal as a wildlife corridor, through appropriate landscaping along the boundary with the canal and potentially improved water quality if there are any existing drains discharging from the site in to the canal. There may also be an opportunity for off-site gain.

Nesting Birds

No current evidence of nesting was found. Potential nesting habitat is however present. This can be dealt with via condition.

Invasive Species

None were recorded as present with a *Cotoneaster* spp recorded just off site. This issue at present can be dealt with via informative.

Contributing to and Enhancing the Natural Environment

Section 170 of the NPPF 2018 states that the planning system should contribute to and enhance the natural and local environment. The recommendation with table 4 of the ecological report are reasonable and proportionate. In particular a bird box and bat box strategy along with mitigation and compensation along and to the Ashton Canal using native planting would be welcomed.

This site may be an opportunity to trial the proposed defra net-gain matrices and if full planning is not proposed in the near future advisable given the uncertainty of when and if this approach becomes mandatory.

Any questions give me a call,

David Dutton

Ecologist

Planning

Development and Investment

Growth

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

— —

EIA Scoping Opinion - Project Bradford

From: **Neil Bayliss-Rowe**

Date: Tue, 7 Jan 2020 at 10:51

Subject: Re: EIA Scoping Opinion - Project Bradford

To: Jennifer Atkinson

Cc: Muniza Usmani

Hi Jen,

Please see comments below:

Residents Parking Zone

The scope makes no reference to the extension and amendment of the existing Etihad Campus Residents Parking Zone (RPZ). The extents of the extended scheme boundary will need agreement between the developer and MCC, but it is expected that the existing RPZ is extended as part of this development. The RPZ currently operates as an event day parking scheme and this will also require review as to the appropriateness of an event day scheme over a 24/7 parking scheme.

Development Parking

Given that the development is situated within a controlled RPZ, a review of where current and new vehicles associated with the Arena and wider Etihad Campus will park is required.

Multi-modal Assessment

A full multi-modal model is required to identify what impacts the development will have on trip generation, parking levels, public transport and sustainable modes. This should incorporate existing travel survey data undertaken by MCFC. This model needs to be realistic and suggest appropriate mitigation measures where interventions are required.

Baseline Traffic Assessment

The baseline traffic assessment will need to consider events at the Etihad Campus but also wider cumulative impacts including City Centre Events (e.g. MEN Arena events), FC United and the O2 Apollo.

In terms of the geographical scope of the surrounding network and junction assessments, the assessment boundary should be extended as follows:

- Rochdale Road to the north
- Ashton New Road, extending to the M60 in the east
- Hyde Road to the south
- Entirety of the City Centre and the ring road

The above baseline assessment should also be used to assess the construction impacts of the proposed development.

Other Notes

5.138 – the construction effects – this should include the impact on cycling as well as pedestrians.

5.144 – this should also consider the impact on cycling

Thanks,

Neil

Neil Bayliss-Rowe
Highways Development Control Manager

Highways Service, Growth and Neighbourhoods Directorate
Manchester City Council
PO Box 532 Town Hall
Manchester
M60 2LA

Web: <http://www.manchester.gov.uk>



Historic England

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

Direct Dial: 0161 2421417

Our ref: PL00648905

20 December 2019

Dear Ms Atkinson

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

Thank you for your email of 4 December 2019 regarding the above scoping opinion request. On the basis of the information available to date, we do not wish to offer any comments. We suggest that you seek the views of your specialist conservation adviser.

It is not necessary for us to be consulted on this application again, unless there are material changes to the proposals. However, if you would like detailed advice from us, please contact us to explain your request.

Yours sincerely,

Ross Brazier
Inspector of Historic Buildings and Areas



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

Telephone 0161 242 1416
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.

Scoping Opinion - Project Bradford

1 message

From: **Laura Miller**
Date: Thu, 19 Dec 2019 at 16:46
Subject: Scoping Opinion - Project Bradford
To: Jennifer Atkinson

Hi Jennifer,

I have looked at the scoping report for the above and have the following comments:

- Air quality - no comments. We are likely to require at least the good practice principles to be applied, they have said there will be some car parking so one EC charge point will need to be provided per 10 spaces (rapid charge facilities)
- Contaminated land - they will need to make sure they obtain a report from the Coal Authority due to the historical mining in the area.
 - Noise - Our guidance does include information on entertainment noise which will need to also be included in the noise assessment along with plant noise.

Kind Regards

Laura

Laura Miller (MRes, MA, BSc(Hons))
Environmental Protection Section

Neighbourhoods Directorate
Community Safety, Compliance and Enforcement
Manchester City Council