



**MANCHESTER
CITY COUNCIL**

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23 July 2025

Our reference: EIASCO/25/006

Wardell Armstrong LLP
Sir Henry Doulton House
Forge Lane
Etruria
Stoke-on-Trent
ST1 5BD

FAO: Thomas Hackett

Dear Mr Hackett

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

**Opinion on Scope of an Environmental Statement under Regulation 15
10-12 Whitworth Street West, Manchester**

I write further to your request in respect of the above received on 9 June 2025.

It is noted that the site is approximately 0.12ha and is a cleared site comprising made ground and concrete. It is bounded by Whitworth Street West to the north, City Road Inn to the east, Cameron Street to the west and the Grade II listed Manchester South Junction and Altrincham Railway Line railway viaduct to the south. Hewitt Street lies beyond the viaduct to the south. Cameron Street, to the west, runs north/south providing vehicle and pedestrian links between Whitworth Street West and Hewitt Street via the railway viaduct arches.

Knott Mill, which is characterised by a mix of employment and residential buildings, lies beyond the viaduct to the south. A live music venue (Rebellion) and Deansgate train station are situated to the west of the site and the entertainment venues at Deansgate Locks lie to the north within the Grade II listed Castlefield Railway Viaduct arches, with outdoor seating areas fronting Rochdale Canal, along with Deansgate/Castlefield tram station on top of the

viaduct. Other listed buildings within the vicinity include Rochdale Canal Locks Numbers 90 and 91, and the Rochdale Canal Lock Keepers Cottage, all Grade II listed. The AXIS apartment building also lies to the north. The site is not in a conservation area but is close to Castlefield Conservation Area, which lies to the west. The site sits among a broad range of uses, including residential, entertainment, commercial and office uses.

The site is in a strategically important location for the city, close to public transport hubs and in an area that has witnessed significant investment and regeneration over the last 20 years. It is within the Whitworth Street West Strategic Regeneration Framework area (2008) and is within the zone of interest of the Knott Mill Masterplan. The Great Northern Manchester Central and Castlefield Quay Strategic Regeneration Framework (2017) areas lie to the north of the site.

The proposal is for full planning permission for a 40 storey purpose built student accommodation building. The development would provide student accommodation, along with communal uses such as lounge areas, work stations, a café, cold storage space, concierge, gym, dinner party rooms and communal roof space.

Pedestrian access to the building would be via Whitworth Street West. There would be access for cyclists to a dedicated cycle store off Cameron Street. A drop-off bay is also proposed on Cameron Street for deliveries and taxi drop-offs. It is anticipated that the proposed development would be car-free, although there is the potential for accessible parking to be included.

In coming to a formal opinion on the scope of the Environmental Impact Assessment (EIA), Manchester City Council, as Local Planning Authority, has taken into account the supporting information contained within your Scoping Report.

I have now had a chance to consider your scoping request and I outline my response below. The scoping report has been the subject of consultation in accordance with the EIA Regulations.

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 (ES). This is also reflected in the nature of the consultation responses, although there are some issues that should be scoped in, which is set out below. You should note the specific points which have been made and particular regard should be given to these.

The following consultees were asked to comment on your request and full copies of the comments from those who responded are provided to you with this letter:

- Manchester City Council (MCC), Head of Regulatory and Enforcement Services (Contaminated Land Section and Pollution Services)
- MCC, Head of Engineering Services (Highways)
- MCC, Flood Risk Management Team (Lead Local Flood Authority (LLFA))

- Greater Manchester Archaeological Advisory Service
- Environment Agency
- Transport for Greater Manchester (TfGM) (included in the MCC Highways response)
- Natural England
- Canal and River Trust
- United Utilities
- Historic England
- Manchester Airport Safeguarding (MAGS)
- National Air Traffic Services (NATS)

Scoping Report

I have the following specific comments to make in respect of the scoping report:

Items Proposed to be Included as Technical Chapters and Scoped In

Air Quality

The comments within your scoping report are noted and are acceptable in terms of their consideration within the ES. Please also note the Environment Agency comments under 'Installations', which refers to impacts from the Manchester Civic Quarter Energy Centre being taken into account. This should be included for consideration within the EIA.

Noise and Vibration

The comments within your scoping report are noted and are acceptable in terms of their consideration in the ES. Please also note the Environment Agency comments under 'Installations', which refers to impacts from the Manchester Civic Quarter Energy Centre being taken into account. This should be included for consideration within the EIA.

Built Heritage, Townscape and Visual Impact Assessment

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

Daylight/Sunlight/Overshadowing

The comments within your scoping report are noted and are acceptable in terms of their consideration within the ES. However, the following should also be included for consideration within the assessment:

Overshadowing of the outdoor terrace of the Lock 91 venue on Century Street.

Wind Microclimate

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

Socio-Economic

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

Cumulative Impacts

The scope of developments listed within Table 3.2 of the Scoping Report and the assessment of cumulative effects are considered to be acceptable and there are no additional schemes that would need to be included at this time.

Items Proposed to be Scoped Out

Within your scoping opinion, you have identified Transport; Ecology; Water Resources and Flood Risk; Ground Conditions and Contamination; Waste; Human Health; Climate Change; Risks of Major Accidents and/or Disasters; Lighting; Aviation; TV, Radio, & Broadband Connectivity as items to be scoped out of the EIA.

I consider that, given the type and magnitude of the development, the following matters should be **scoped into** the EIA.

Traffic and Transport in relation to Construction Phase – Further to the comments of the Local Highway Authority, the EIA and following Construction Management Plan (CMP) should identify any mitigation measures necessary to address any significant effects during the construction phase of the proposed development. Assessment should not only consider construction trip generation but also traffic redistribution impacts associated with any required traffic management/temporary road closures during the construction phase. Assessment should consider any required traffic management/temporary road closure impacts on pedestrians during the construction phase. Appropriate traffic data should be provided to inform the associated assessments.

Demographics, Socio-economics and Health - It is considered that the demographic, socio-economic and health impacts of this scheme are significant enough to warrant assessment through the EIA process. This should include an assessment of direct and indirect construction and operational effects on the local and regional environment, including the economy, housing provision, student housing, education, employment, health and healthcare, crime, and on-going regeneration within the City.

Water Resources and Flood Risk – Further to the comments from the Lead Local Flood Authority, the proposed EIA scoping out of flood risk is not accepted unless: the planning submission provides a standalone drainage strategy to restrict runoff in line with Manchester City Council policy; and demonstrates consultation with United Utilities to gain their support on appropriate safeguards for the public sewer assets indicated onsite.

Solar Glare – An assessment of the impact of any glazed facades of the proposal on highway and train/tram safety, based on a worst-case scenario, should be scoped into the EIA.

Climate Change – An assessment of the impact of the development on climate change is required and should be scoped into the EIA.

The City Council has considered the following remaining matters which you have scoped out of the EIA:

Transport (operational phase); Ecology; Ground Conditions and Contamination; Waste; Risks of Major Accidents and/or Disasters; Lighting; Aviation; TV, Radio, & Broadband Connectivity.

With regard to these matters, the comments within your scoping report and addendum are noted and the City Council is in agreement that these matters can be scoped out of the EIA. This is provided that the applications are supported by the appropriate documentation as detailed within your scoping report, including details of any mitigation to minimise any effects as a result of the development, and including any details raised by the statutory consultees in their responses (copies attached).

The Canal and Rivers Trust have requested that the impact of piling works on the stability of neighbouring properties, in particular the retaining wall that supports Whitworth Street West above the Rochdale Canal, be scoped into the EIA under the Noise and Vibration chapter. I do not consider that this matter needs to be scoped into the EIA, but it should be given consideration as part of the planning submission.

As a result of consultation with statutory consultees at this time, additional areas of work are not expected to form part of any EIA, other than those mentioned above. However, the Local Planning Authority reserves the right to seek further information in connection with the Environmental Statement as matters arise.

Should you wish to discuss any of the above, please contact Lucy Harrison.

Yours sincerely



Julie Roscoe
Director of Planning, Licensing and Building Control

CONSULTATION RESPONSE: EIASCO/25/006

From Safeguarding MAN <[REDACTED]>

Date Thu 12/06/2025 09:52

To Lucy Harrison <[REDACTED]>

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The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended) (the "EIA" Regulations)

Reference: EIASCO/25/006 - Request for Scoping Opinion

Our Ref.: 2025-306

Dear Lucy,

Thank you for consulting Manchester Airport's Aerodrome Safeguarding authority on the proposed Fusion Students and ATRI7 6 LIMITED, Whitworth Street West, Manchester, development.

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

When considering the type, scale and design of any development within the Whitworth Street West area, we therefore recommend that consideration of the relevant aerodrome safeguarding criteria, consultation procedures with ourselves and NATS, and any potential impacts on aircraft safety are addressed. This will principally relate to the predicted height of buildings at this location and whether there is any potential interference to RADAR operations or any height infringement to Instrument Flight Procedure Surfaces. We note that the developer is mindful of the height of construction equipment and the need to include obstacle lighting in the building design.

We do endorse the value of promoting early engagement with stakeholders and the only judge of whether there will be a radar interference issue is NATS. We would therefore urge consultation with them to discuss the implications of proposals as they take shape.

Sincerely,

MAG Group Aerodrome Safeguarding Team

Stansted Airport | East Midlands Airport | Manchester Airport

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

[Aerodrome Safeguarding | Manchester Airport](#)
www.magairports.com

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Date: 12 June 2025
Our ref: 515313
Your ref: EIASCO/25/006



Lucy Harrison
Manchester City Council

BY EMAIL ONLY

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Electra Way
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CW1 6GJ

T 0300 060 900

Dear Lucy Harrison

Environmental Impact Assessment Scoping consultation (Regulation 15 (4) of the Town and Country Planning EIA Regulations 2017): EIA scoping opinion for proposed 40 storey purpose built student accommodation building

Location: 10 - 12 Whitworth Street West, Manchester, M1 5NZ

Thank you for seeking our advice on the scope of the Environmental Statement (ES) in the consultation dated 10 June 2025, received on 10 June 2025.

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

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

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

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

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

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

Yours sincerely


Consultations Team

Annex A – Natural England Advice on EIA Scoping

General Principles

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

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

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

Cumulative and in-combination effects

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

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

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

Environmental data

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

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

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

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

Biodiversity and Geodiversity

General principles

The [National Planning Policy Framework](#) (paragraphs 192-196) sets out how to take account of biodiversity and geodiversity interests in planning decisions. Further guidance is set out in Planning Practice Guidance on the [natural environment](#).

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

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

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

Designated nature conservation sites

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

Regionally and Locally Important Sites

The ES should consider any impacts upon local wildlife and geological sites, including local nature reserves. Local Sites are identified by the local wildlife trust, geoconservation group or other local group and protected under the NPPF (paragraph 192 and 193). The ES should set out proposals for mitigation of any impacts and if appropriate, compensation measures and opportunities for enhancement and improving connectivity with wider ecological networks. Contact the relevant local body for further information.

Protected Species

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

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

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

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

District Level Licensing for Great Crested Newts

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

Priority Habitats and Species

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

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

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

The Environmental Statement should include details of:

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

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

Ancient Woodland, ancient and veteran trees

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

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

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

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

Biodiversity net gain

Paragraph 193 of the NPPF states that decisions should contribute to and enhance the natural and local environment by minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures.

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

Proposals for mandatory biodiversity net gain should be in line with the Environment Act 2021 and supporting regulations. Further information on biodiversity net gain, including [draft Planning Practice Guidance](#), can be found [here](#)

The statutory [biodiversity metric](#), together with ecological advice, should be used to calculate the change in biodiversity resulting from proposed development and demonstrate how proposals can achieve a net gain.

The metric should be used to:

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

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

Opportunities for wider environmental gains should also be considered.

Landscape

Landscape and visual impacts

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

The ES should include a full assessment of the potential impacts of the development on local landscape character using [landscape assessment methodologies](#). We encourage the use of Landscape Character Assessment (LCA), based on the good practice guidelines produced jointly by the Landscape Institute and Institute of Environmental Assessment in 2013. LCA provides a sound basis for guiding, informing, and understanding the ability of any location to accommodate change and to make positive proposals for conserving, enhancing or regenerating character.

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

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

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

Heritage Landscapes

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

Connecting People with nature

The ES should consider potential impacts on access land, common land, public rights of way and, where appropriate, the England Coast Path and coastal access routes and coastal margin in the vicinity of the development, in line with NPPF paragraph 105. It should assess the scope to mitigate for any adverse impacts. Rights of Way Improvement Plans (ROWIP) can be used to identify public rights of way within or adjacent to the proposed site that should be maintained or enhanced.

Measures to help people to better access the countryside for quiet enjoyment and opportunities to connect with nature should be considered. Such measures could include reinstating existing footpaths or the creation of new footpaths, cycleways, and bridleways. Links to other green networks and, where appropriate, urban fringe areas should also be explored to help promote the

creation of wider green infrastructure. Access to nature within the development site should also be considered, including the role that natural links have in connecting habitats and providing potential pathways for movements of species.

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

Soils and Agricultural Land Quality

Soils are a valuable, finite natural resource and should also be considered for the ecosystem services they provide, including for food production, water storage and flood mitigation, as a carbon store, reservoir of biodiversity and buffer against pollution. It is therefore important that the soil resources are protected and sustainably managed. Impacts from the development on soils and best and most versatile (BMV) agricultural land should be considered in line with paragraphs 187 and 188 of the NPPF. Further guidance is set out in the Natural England [Guide to assessing development proposals on agricultural land](#).

As set out in paragraph 223 of the NPPF, new sites or extensions to sites for peat extraction should not be granted planning permission.

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

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

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

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

Further information is available in the [Defra Construction Code of Practice for the Sustainable Use of Soil on Development Sites](#) and The British Society of Soil Science Guidance Note [Benefitting from Soil Management in Development and Construction](#).

Air Quality

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

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

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

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

Water Quality

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

Climate Change

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

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

creation and peatland restoration, should be considered. The ES should set out the measures that will be adopted to address impacts.

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

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

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

Contribution to local environmental initiatives and priorities

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

Fw: EIA Regulation Request for Scoping Opinion - 10 - 12 Whitworth Street West [SG34389]

From Planning <[REDACTED]>

Date Fri 13/06/2025 13:23

To Lucy Harrison <[REDACTED]>

Information, Delivery & Support Team
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: NATS Safeguarding <[REDACTED]>

Sent: 13 June 2025 12:57

To: Planning <[REDACTED]>

Subject: RE: EIA Regulation Request for Scoping Opinion - 10 - 12 Whitworth Street West [SG34389]

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Our Ref: SG34389

Dear Sir/Madam

The proposed development has been examined from a technical safeguarding aspect and does not conflict with our safeguarding criteria. Accordingly, NATS (En Route) Public Limited Company ("NERL") has no safeguarding objection to the proposal.

However, please be aware that this response applies specifically to the above consultation and only reflects the position of NATS (that is responsible for the management of en route air traffic) based on the information supplied at the time of this application. This letter does not provide any indication of the position of any other party, whether they be an airport, airspace user or otherwise. It remains your responsibility to ensure that all the appropriate consultees are properly consulted.

If any changes are proposed to the information supplied to NATS in regard to this application which become the basis of a revised, amended or further application for approval, then as a statutory consultee NERL requires that it be further consulted on any such changes prior to any planning permission or any consent being granted.

Yours faithfully

NATS

NATS Safeguarding

E: [REDACTED]

4000 Parkway, Whiteley,
Fareham, Hants PO15 7FL
www.nats.co.uk



NATS Internal

From: [REDACTED] <[REDACTED]>
Sent: 10 June 2025 12:03
To: NATS Safeguarding <[REDACTED]>
Subject: EIA Regulation Request for Scoping Opinion - 10 - 12 Whitworth Street West

Your attachments have been security checked by Mimecast Attachment Protection. Files where no threat or malware was detected are attached.

Please see attached request for scoping opinion under reference EIASCO/25/006.

Regards,
Information, Delivery & Support Team,
Planning, Building Control & Licensing,
Manchester City Council, P O Box 532, Manchester M60 2LA

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

Our ref: SO/2025/125054/01
Your ref: EIASCO/25/006
Date: 24 June 2025

Dear Lucy Harrison

Request for scoping opinion under part 4, regulation 15 of the town and country planning (environmental impact assessment) regulations 2017 (as amended)

10 - 12 Whitworth Street West Manchester M1 5NZ

Thank you for consulting the Environment Agency (EA) on the above Environmental Impact Assessment (EIA) Scoping Opinion Request, which we received on 10 June 2025.

We have reviewed the submitted Scoping Report. The following comments, made in respect of ground conditions, installations and surface water, will ensure that the environmental statement addresses the key environmental issues for this proposal.

Ground conditions – Contaminated Land

We expect the Environmental Impact Assessment to consider the impacts the development may have in relation to contamination at the site and detail any required mitigation measures to prevent an adverse impact on the water environment.

In addition, where historic uses have led to contamination of the soils and/or groundwater beneath the site, the developer should address risks posed to controlled waters by referring to the published Environment Agency [land contamination technical guidance](#) available on the direct.gov website.

Installations

Air Quality & Emissions Monitoring

The facility is permitted to emit Nitrogen Dioxide (NO₂) with strict limits:

- 100 mg/m³ for the boilers
- 35 mg/m³ for the Combined Heat and Power (CHP) unit, which is equipped with Selective Catalytic Reduction (SCR) technology
- Monitoring is conducted annually as per Monitoring Certification Scheme (MCERTS) standards.

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

Cont/d..

Emissions are monitored annually in accordance with the Monitoring Certification Scheme (MCERTS) standards.

Given the residential nature of the proposed development, it is important to assess whether any sensitive receptors, such as residential windows, balconies, or amenity spaces, could be affected by these emissions, particularly under conditions of low wind dispersion or temperature inversions.

Cumulative Impact & Stack Dispersion

Although the Energy Centre operates within permitted emission limits, the cumulative impact of nearby Medium Combustion Plants (MCPs) should be assessed. It is important that the proposed development does not obstruct the effective dispersion of emissions from the Energy Centre's flue, which stands at 37m high. Tall buildings constructed too close and downwind of the stack could interfere with dispersion and lead to elevated ground-level concentrations.

Consultation Requirement

To reduce the risk of future air quality complaints or misattribution of odour and noise sources, the following actions are recommended:

- Planning Notification: Ensure the Manchester City Council informs future residents about the presence and operational nature of the nearby Energy Centre
- Air Quality Impact Assessment (AQIA): Conduct a comprehensive AQIA that includes cumulative impacts and worst-case meteorological dispersion modelling

Noise & Vibration

No specific noise issues have been reported from the Energy Centre to date. However, it is advisable to confirm that the proposed development incorporates appropriate acoustic mitigation measures to prevent future complaints that could affect the Energy Centre's permitted operations.

Permit Safeguarding

The Energy Centre is a key infrastructure asset supporting local heat decarbonisation efforts. It is essential that future planning permissions do not result in operational constraints, such as statutory nuisance claims or restrictive planning conditions, that could compromise its continued function.

Surface Water

We note that within the Scoping Report, it is proposed to scope out Water Resources As part of the (EIA) process, please ensure that the EIA, Construction Environment Management Plan (CEMP), Environmental Statement, and Sustainable Drainage Strategy (SuDS) are submitted for review.

Further clarification is required regarding how foul drainage will be managed both during the construction phase and once the development is complete. The CEMP should also include detailed mitigation measures to prevent any potential impacts on nearby watercourses throughout the construction period.

There is a reference to boreholes within the documentation, but their intended purpose is unclear. Confirmation would be required for whether these are for ground investigation, monitoring, or another use.

Additionally, the annexed documents mention the potential dewatering of the site. If dewatering is proposed, you are advised to consider applying for the appropriate licence, as this activity could affect surrounding watercourses and groundwater conditions.

Therefore, for the planning application, the above matters should be made clear in how they will be addressed.

Should you require any additional information, or wish to discuss these matters further, please do not hesitate to contact me at the email address below.

Yours faithfully,

[Redacted Signature]

Sustainable Places Advisor

[Redacted Contact Information]

Fw: Planning Application Reference: EIASCO/25/006

From Planning <[REDACTED]>

Date Thu 19/06/2025 14:45

To Lucy Harrison <[REDACTED]>

Information, Delivery & Support Team
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: [REDACTED]

Sent: 19 June 2025 14:42

To: Planning <[REDACTED]>

Subject: Planning Application Reference: EIASCO/25/006

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Your Ref: EIASCO/25/006

Our Ref: DC/25/1437

Location: 10 - 12 Whitworth Street, West Manchester, M1 5NZ

Proposal: Request for Scoping opinion under Part 4, Regulation 15 of The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended)

United Utilities wish to make the following comments regarding the proposal detailed above.

Whilst we have no specific comments to make on the scoping report, we would be grateful if you could advise the applicant of the following comments:

-
According to our records, a water main is located within the scoping boundary and a public sewer is located in very close proximity to the scoping boundary. The precise location of these assets (and the associated easement strips) will need to be confirmed by the applicant and any future development, including construction compounds, must not encroach on these assets or the associated maintenance strips.

United Utilities wishes to emphasise the importance of surface water management in line with the drainage hierarchy. All options for the sustainable management of surface water must be thoroughly investigated before we will accept any surface water connections from new development to the public sewer. Where a new surface water connection to the public sewer is proposed, we will require robust

evidence to demonstrate the drainage hierarchy has been fully investigated and there are no more sustainable options available for the management of surface water. United Utilities will not accept the disposal of contaminated groundwater or surface water to the public sewers. This is outlined in the Water Industry Act (1991)

We wish to highlight our pre-development service for developers to discuss wastewater asset protection measures and agree drainage strategies and water supply requirements. We cannot stress highly enough the importance of developers contacting us as early as possible. If the applicant hasn't already done so, they can take advantage of our pre-development service by emailing SewerAdoptions@uuplc.co.uk or by visiting our website <https://www.unitedutilities.com/builders-developers/your-development/planning/pre-development-guidance/>. To discuss how the proposal interacts with the water mains assets we recommend the applicant contacts DeveloperServicesWater@uuplc.co.uk.

Please feel free to contact me should you have any further queries.

Kind regards



[Redacted]
Apprentice (Assistant Town Planner)
Planning Team
Strategic Planning & Sustainability
unitedutilities.com

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Application details:	EIASCO/25/006 Request for Scoping opinion under Part 4, Regulation 15 of The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended) 10 - 12 Whitworth Street West Manchester M1 5NZ
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LLFA Comments 30/06/2025

The following Information has been considered:

Planning Portal uploads:	09/06/2025
Further submission emails:	N/A
Pre-Application Advice:	N/A

Any LLFA Comments to LPA

The proposed EIA scoping out of flood risk is **not** accepted on the basis of the project commitments as defined in the following sections:

- 3.3.24 commits to provision of a standalone drainage strategy which will maintain pre-development runoff rate. This is in contradiction with our local policy for runoff rates which requires a minimum of 50% betterment (only permitted where re-using an existing connection), or greenfield rates for new connections or where required by the relevant risk management authority (RMA) for the receiving asset. All discharge rate proposals must be supported by approval in principle from the relevant RMA for the proposed rate and connection point for the LLFA to accept an appropriate discharge rate.
- 3.3 does not acknowledge United Utilities (UU) public sewer assets approximately onsite (eastern site boundary) or commit to consult UU as Risk Management Authority for sewer flooding.

The proposed EIA scoping out of flood risk **would become acceptable** if the following project commitments are made in the EIA scoping report:

- Commitment to provision of a standalone drainage strategy to restrict runoff in line with MCC policy.
- Commitment to consult UU to support the Planning application, on appropriate safeguards for the public sewer assets indicated onsite.

Application EIASCO/25/006 - 10-12 Whitworth Street West, Manchester - Scoping Opinion (Archaeology)

From [REDACTED]
Date Mon 23/06/2025 16:12
To Lucy Harrison <[REDACTED]>

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Good afternoon Lucy

RE: Application EIASCO/25/006 - Request for Scoping opinion under Part 4, Regulation 15 of The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended) - 10-12 Whitworth Street West, Manchester M1 5NZ

Thank you for consulting GMAAS for a Scoping Opinion on the above proposed scheme.

The application is supported by an EIA Scoping Report prepared by Wardell Armstrong in June 2025. This report makes no reference to archaeology, which evidently hasn't been considered as a topic. However, the site was subject to a detailed archaeological assessment that was compiled to support a previous application for redevelopment. This concluded that the site has no potential to retain any remains of archaeological interest. Having reviewed this conclusion against our records, GMAAS is content that the proposed scheme will not have any significant effects on the below-ground archaeological resource and that archaeology can be scoped out of the EIA process. Indeed, based on the results obtained from the previous assessment, no further consideration of archaeological matters is warranted in this instance.

With kindest regards

[REDACTED]



University of
Salford
MANCHESTER

[REDACTED]
Heritage Management Director
Greater Manchester Archaeological Advisory Service
Centre for Applied Archaeology, Peel Building
School of Science, Engineering & Environment
University of Salford, Manchester M5 4WT, UK
[REDACTED]





Historic England

Ms Lucy Harrison
Manchester City Council
Planning
PO Box 532
Town Hall
MANCHESTER
M60 2LA

Direct Dial: [REDACTED]

Our ref: PL00799077

27 June 2025

Dear Ms Harrison

**EIASCO/25/006 | Request for Scoping opinion | 10 - 12 Whitworth Street West
Manchester M1 5NZ**

Thank you for your letter of 10 June 2025 consulting us for a Scoping Opinion for the above proposed development.

Having reviewed the submitted EIA Scoping Report (Wardell Armstrong, June 2025), we agree that Heritage should be scoped into the EIA, and that the heritage assets identified for inclusion are appropriate.

Yours sincerely,

[REDACTED]

Inspector of Historic Buildings and Areas

[REDACTED]



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.

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

Your Ref EIASCO/25/006

Our Ref CRTR-PLAN-2025-44417

Friday 27 June 2025

Dear Lucy Harrison,

Proposal: Request for Scoping opinion under Part 4, Regulation 15 of The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended)

Location: 10-12, Whitworth Street West, Manchester

Waterway: Rochdale Canal

Thank you for your consultation.

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

The Trust own and manage the Rochdale Canal, which lies in a cutting to the north of the application site.

We wish to provide comments on the following aspect of the Scoping Report:

Daylight/Sunlight and Overshadowing

The proposed building would be located directly to the south of the canal, and has the potential to result in substantial shading to the canalside area. As the canal is already in a cutting, there is a risk that further overshadowing could significantly degrade the attractiveness of the canalside path and the waterspace for walking, cycling and leisure use. We welcome that paragraph 7.2.4 has acknowledged the potential overshadowing of the canal, which is considered as a sensitive receptor.

We consider this to be important in order to ensure that the development complies with the aims of adopted policy JP-G3: River Valleys and Waterways from the adopted Places for Everyone document, which seeks to protect watercourses as central components of the Green Infrastructure Network. This includes a need to help maintain their role for providing public recreation and enjoyment.

Nosie and Vibration

There is a risk that piling works could result in significant vibrations that could result in damage to the retaining wall that supports Whitworth Street above the canal. In the interests of land stability, we request that vibrations should be controlled and monitored (with monitoring at the position of the wall undertaken) to mitigate against this risk.

Canal & River Trust Spatial Planning Team

E: planning@canalrivertrust.org.uk **W:** canalrivertrust.org.uk **T:** 0303 040 4040

The scoping document does not identify the risk of vibrations to neighbouring property, including neighbouring retaining structures. **We therefore request that this is included and scoped into the Environmental Statement so that the risks can be fully assessed.**

Other Comments

Our consent as Landowner and Navigation Authority would be required for works taking place in proximity to the canal. This would include any oversailing of the canal by cranes on site.

In our capacity as landowner, we advise that the applicant/undertaker would likely be required to comply with the Trust's 'Code of Practice for Works affecting the Canal & River Trust' (available at: <https://canalrivertrust.org.uk/business-and-trade/undertaking-works-on-our-property-and-our-code-of-practice>).

The applicant/developer is advised to contact the Canal & River Trust's Infrastructure Services Team via switchboard on 0303 040 4040 should they have any questions or require further information upon the Code of Practice.

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

Yours sincerely,

[Redacted Signature]

Senior Planner – Major Projects & Infrastructure

[Redacted Name]

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

Canal & River Trust Spatial Planning Team

E: [Redacted Email] W: canalrivertrust.org.uk T: 0303 040 4040

EIASCO/25/006 - 10-12 Whitworth Street West Manchester M1 5NZ

From [REDACTED]
Date Tue 01/07/2025 13:10
To Lucy Harrison <[REDACTED]>

Hi Lucy,

We have reviewed the submitted request for a scoping opinion. We agree with ground conditions being scoped out and Air Quality/Noise and Vibration to be scoped in. We also welcome the proposed consultation with us for the chapters being scoped in prior to the Environmental Statement being prepared.

Kind Regards

[REDACTED]

Environmental Protection
Environmental Health
Neighbourhoods Directorate
Manchester City Council

email: [REDACTED]
website: www.manchester.gov.uk
[REDACTED]

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Memorandum

To Lucy Harrison

From [REDACTED]

Date 2 July 2025

Subject **EIASCO/25/006**

Request for Scoping opinion under Part 4, Regulation 15 of The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended)

We have reviewed the above application in relation to highways and our comments are as follows:

Context:

The indicative proposals are for a 40-storey purpose built student accommodation building, along with a range of communal uses such as lounge areas, workstations, café, cold storage space, concierge gym, dinner party rooms and communal roof space.

Document Submission

The EIA Scoping Report confirms that the proposed development will be supported by a Transport Statement and Construction Management Plan.

MCC Highways would require a Move-In / Move-Out Strategy, Travel Plan, Waste Management Plan and Delivery & Servicing Strategy.

A Stage 1 RSA should also be provided at planning stage for any proposed reconfiguration of the highway network.

For the avoidance of doubt the Transport Statement should comprise of:

- o A multi-modal trip generation assessment with further detail on anticipated public transport, pedestrian and cycle distribution/routes/capacities.
- o A clear estimate of the level of new multi-modal trips likely to be associated with the development, based on an inspection of similar (and similarly-located) developments across the UK (excluding London) via the TRICS (or similar) database. The assessment work should be undertaken using a person-trip approach and applying the appropriate modal share percentages from local Census data. Other methodologies to determine trip rates are acceptable but these should be fully explained in the TA.

- o A clearly defined methodology for determining the distribution / assignment of development trips onto the network i.e. understanding of where such new traffic is likely to distribute to/from, based on data sources such as a Census Journey-to-Work statistics and/or vehicle turning proportions at nearby Junctions
- o An assessment of traffic levels and impacts at the specified year of opening of the development, and at a future year at least five years later, with due regard for traffic growth (if any).
- o An understanding of the likely impacts of the proposed development considered alongside any other nearby committed developments.
- o In the relevant TA, clear diagrams should be provided illustrating the following elements, each individually:
 - Base Flows
 - Committed Development Flows
 - Proposed Flows
 - Proposed Distribution
 - Base plus Committed plus proposed development
 - Future plus Committed plus proposed development
- o TfGM HFAS recommends an increase of about 30vehs/hr at a junction as an appropriate threshold for considering the necessity of a traffic impact assessment; this is in preference to a percentage-increase threshold, which tends to favour development in already heavily-trafficked areas.
- o The scope of the junctions to be assessed by detailed modelling should be agreed with TfGM (UTC) and the LHA in advance and will depend upon the outcome of the trip assessment and distribution exercise. For this reason, TfGM would advise that a trip generation and distribution exercise should be issued before submission of the planning application. Once this is undertaken it will be possible to finalise TfGM requirements in terms of the TA. This will largely depend on the amount of trip generation.
- o Include analysis of collision data during the most recent five-year period, with identification of any underlying patterns that might be affected by the development;
- o Up-to-date traffic counts should be used in any assessments - scope to be agreed with the Local Highway Authority (LHA), TfGM UTC and HFAS. TfGM UTC can be contacted in respect of the availability of any traffic counts in the area that could be used for the assessment.
- o Provide justification for the proposed level of cycle parking. It should be noted that some short-stay cycle parking provision would also be beneficial for visitors. Sheltered and secure cycle parking will be required for staff;
- o Provide justification for the proposed level of car parking;
- o Include proposed S278 highways engineering drawings, which should demonstrate appropriate swept-path assessment, visibility and retention of safe pedestrian movement around the site access including both primary vehicular access points and emergency access/routes. A summary of the RSA1 findings within the TA would also be useful;
- o Demonstration that waste and service vehicles can safely utilise the proposed site layout / adjacent highway network;
- o Undertake a review of Traffic Regulation Orders on the surrounding streets in the vicinity of the development and identification of modifications;
- o Include information on emergency access routes and how these would integrate with the adjacent highway network and developments;
- o Provide details on/management of taxis, site deliveries and servicing (including engineering drawings).

EIA Transport Chapter - Highways Scoping Response:

An EIA Scoping Report has been submitted for the proposed development.

The Scoping Report suggests that trip generation associated with the construction and operational phases for the proposed development is 'extremely limited', and 'well below the thresholds for assessment set out in IEMA Guidelines for Transport in ES'. However, no evidence has been provided to support this statement.

Whilst Highways agree that EIA assessment of the operational phase are not necessary due to the proposed parking provision at the site and accessible location, no evidence has been provided with regard to baseline surrounding traffic flows and daily construction vehicle movements in order to support scoping out of the construction phase. Further evidence is therefore requested by Highways, or should such data not be available at this stage, highways suggest that assessment of the construction phase is scoped into the EIA assessments, once further detail can be obtained on baseline traffic flows and construction vehicle numbers/routeing.

Assessment should not only consider construction trip generation but also traffic redistribution impacts associated with any required traffic management/temporary road closures during the construction phase. Assessment should consider any required traffic management/temporary road closure impacts on pedestrians during the construction phase.

Whilst MCC Highways accept that a number of the IEMA environmental effects would be considered within other technical assessments of the ES (including noise, vibration, visual impacts, air pollution, dust and dirt, ecological impact and heritage and conservation), appropriate traffic data should be provided to inform the associated assessments.

General Comments:

Mitigation:

The developer should identify appropriate mitigation to accommodate any increases in traffic generation and increased pedestrian and cyclist movements. Any appropriate mitigation should be identified in conjunction with TfGM UTC and MCC who will be happy to work with the developer to agree an approach.

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

Metrolink Impact:

TfGM Metrolink would request that the following are assessed as part of the full application, these are:

1. The effects of solar glare on the tram
2. Modal travel and that the impact on the Deansgate tram stop is assessed.

TRO Review:

A review of Traffic Regulation Orders on the surrounding streets in the vicinity of the development is required to determine if any changes are required to ensure potential overflow car parking from the development does not impact highway operation/safety.

Vehicle Parking & Access:

The development will be promoted as being 'car-free' with no general car parking to be provided on site. No car parking is being offered as part of the development and this aligns with current city centre transport aspirations. Given the city centre location, the lack of on-site car parking is considered acceptable for the development. This will be subject to robust travel planning strategies and appropriate cycle storage provision to encourage the use of sustainable modes.

The Transport Statement should provide information on the proposed access arrangements to the site for pedestrians and cyclists.

Cycle Parking:

Highways requested a minimum of 25% student cycle parking.

It is requested that visitor parking is also available.

Staff parking will be required.

Site Accessibility by Sustainable Modes:

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

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

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

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

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

It should be highlighted that LTN/120 has been introduced by the DfT and this has changed the requirements for the design of cycling provision.

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

Waste and Service Management:

The Transport Statement should provide details on bin store locations. These must meet MCCs GD04 guidance and must not be located on the adopted highway.

The Transport Statement should include details on the waste forecast, waste vehicle collection points and how the site will be serviced in terms of delivery vehicles.

For the avoidance of doubt, swept path analysis should be provided of a 11.5m refuse vehicles within the development site. The swept path should demonstrate that the refuse vehicle can enter and exit in forward gear and manoeuvre around the site safely.

It is requested that servicing is undertaken outside of the network AM and PM peak periods. It is also requested that a Service Management Strategy is in place.

Swept path analysis should be provided for the largest expected service/delivery vehicle within the development boundary. The number of deliveries and location of the delivery points should also be provided.

It is requested that a service management strategy is submitted as part of the planning application.

Off-Site Highways Works:

A S278 agreement is required for works to the adopted highway - a deposit is required to begin the S278 application, additional costs will be payable and are to be agreed with S278 Statutory Approvals team. Following an assessment of the scope of works, all additional estimated costs are required to be paid in full prior to the expenditure of the initial deposit, or work on the technical approval process will cease and can delay the programme for the start of works on site. The minimum standard S278 technical approval timescale is between 4-6 months and, if TRO's are included, can take 12 months so please programme this into your timetable. Please note: you will not be able to start works on the highway until technical approval has been given by the S278 Engineer and the relevant highways permits granted.

Any modifications / improvements to the public highway or footpath will require agreement with MCC's Highways Applications and Network Resilience teams. This will be funded at the applicant's expense. The following link provides access:

https://www.manchester.gov.uk/directory_record/287709/permission_to_work_on_the_highways_-_section_278_agreements/category/355/highways_and_pavements

For the avoidance of doubt, all non-standard materials to be used on the adopted highway will be subject to applicable commuted sums, likewise for the implementation of street trees on the highway.

It is expected that all modifications / improvements to the public highway are achieved with a maximum carbon footprint of 40%. Materials used during this process must also be a minimum of 40% recycled and fully recyclable. Developers will be expected to demonstrate that these standards can be met prior to planning conditions being discharged. The developer is to agree the above with MCC's Statutory Approvals and Network Resilience Teams post planning approval and prior to construction taking place.

It is recommended that footways are 2.0m minimum (clear of street furniture and other obstructions) in width to accommodate double buggies and other residents/visitors with restricted mobility.

It is requested that footways bounding the site are resurfaced as part of a S278 agreement and at cost to the applicant.

For any projects that require a S278 and/or S38 highway agreement a Stage 1 Road Safety Audit (RSA 1) is requested to inform the preliminary design at the pre-planning stage - prior to planning approval being granted. This ensures that any underlying highway safety issues have been identified and mitigation is proposed accordingly. The scope and study area of the RSA1 will be agreed on a site by site basis however, as a minimum, it is expected to include the following:

- o 5 years of accident history
- o Audit of key pedestrian routes (crossing points, footway widths, condition etc.)
- o Audit of key cycling routes (ASLs, cycle lanes etc.)
- o Highway layout including, but not limited to (visibility assessments, speed limits, TROs, traffic calming etc.)

A copy of the report (with Designer's Response) is to be made available to the Statutory Approvals Team upon request.

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 applicant liaise directly with TfGM's bus infrastructure team who can be contacted at Shelters@tfgm.com.

Student Move In/Move Out Strategy:

A Student Move In / Move Out Strategy should be prepared for the development. The Strategy should detail arrival arrangements and move-in procedure at the beginning of term and the departure arrangements and move-out procedure at the end of term.

It is noted that there are other PBSA sites within the area and it is recommended that the end user liaise with the other PBSA sites during the move in and move out periods.

Servicing and Access Arrangements:

Consideration should be given to private taxi, food & drink and parcel delivery movements. In order to fully understand the potential impacts of private taxi & food / parcel deliveries for new PBSA developments within the city and the impact of this type of pick up / drop off activity, applicants will be expected to follow the below suggested guidance:

- o All developments will ideally provide an off-highway location to accommodate all drop off / pick up activity at the site, including vehicular and cycle activity;
- o The applicant must justify the numbers of trips associated with Taxi & Food / Parcel Deliveries as part of the planning submission. The methodology of the assessment should be agreed with MCC and utilise industry standard tools i.e. TRICS;
- o Whilst it is accepted that current data is limited in terms of this type of activity, any additional justification and evidence from recently occupied sites would also be of benefit;
- o Once a robust and agreed trip generation has been established, the applicant will be required to demonstrate how this activity can be accommodated either within the site itself or within the adopted highway. This should account for peak hour activity where the most likely period of conflict will occur.
- o In terms of an internal drop off / pick up facility - the applicant will be expected to illustrate that all vehicle / cycle activity can be accommodated within the site. This should not impact on the adopted highway, including footway.

- o Should drop off / pick up not be accommodated internally, the applicant will be required to assess the exiting highway layout and Traffic Regulation Orders (TROs) and demonstrate that the parking restrictions can accommodate the peak number of movements associated with Taxi & Food / Parcel Deliveries. This should include surveys of existing on-street parking and loading / unloading activity within the vicinity of the site.
- o Where amendments are required to the adopted highway, in order to provide a safe and functional drop off / pick up location, this will be captured as part of a S278 agreement to be fully funded by the applicant.

All developments will be expected to provide a Management Strategy for Food / Parcel Deliveries. This strategy will need to provide clear direction as to how the below considerations are to be brought forward and managed for the duration of the site's occupation:

1. Designate a Delivery Drop-off Point: Work with the management or housing staff of the development to establish a designated drop-off point for deliveries. This could be a specific lobby area or a central location easily accessible to delivery drivers.
2. Display Signage: If permitted, put up clear signage in the development's common areas to guide delivery drivers to the drop-off point. This will help prevent confusion and ensure timely deliveries.
3. Inform Residents: If possible, notify all residents of the new delivery process. Inform them about the designated drop-off point and any specific rules or guidelines they need to follow when receiving deliveries.
4. Set Delivery Hours: Establish specific delivery hours for residents of the development where possible. This could help manage the flow of deliveries, especially during peak times.
5. Regularly Review the Process: Periodically review how the drop-off process is working. Gather feedback from residents, delivery drivers, and staff to identify any areas for improvement and make necessary adjustments.
6. Consider a Delivery Holding Area: If feasible, set up a secure delivery holding area within the development. This can be especially helpful for residents who may not be immediately available to receive their orders.
7. Monitor Security Concerns: Ensure that the delivery process does not compromise the security and safety of the residents of the development. Address any security concerns promptly and collaborate with building management to implement appropriate measures.
8. Encourage Feedback: Encourage residents to provide feedback on their delivery experiences. This will help you assess the efficiency of the process and identify any potential issues that need to be addressed.

Travel Plan:

A Framework Travel Plan should be submitted as part of the forthcoming planning application.

For a Travel Plan to be successful, it will be dependent on establishing a culture of sustainable travel behaviour at the outset, rather than on changing already established travel practices. The success of Travel Plan measures will depend on their effective delivery and commitment from the occupier and therefore robust arrangements for the implementation and running of the Travel Plan need to be included in the Framework Travel Plan from the outset. These include:

- o A travel plan budget and resources for the implementation and day to day management of travel plan measures;
- o Appropriate management structures;
- o Detailed time frames for the delivery;

- o Handover arrangements for the travel plan or its components when the developer's responsibility ceases; and
- o Targets and monitoring arrangements.

The full Travel Plan should include tailored measures to overcome specific barriers, or take advantage of opportunities, presented by the site.

The development, submission, implementation and monitoring of a Full Travel Plan will be conditioned with any planning consent.

Construction Management:

The construction of the site could result in the closure of roads and footpaths, physical works within the highway to form new site access points, layout improvements, service upgrades and the need to accommodate regular deliveries of materials and construction equipment. It is acknowledged that the precise nature of the construction related highway effects are difficult to identify in detail until a final construction programme and delivery phasing plan has been undertaken.

It is recommended that the applicant has early engagement with MCCs Event and Network Management Team and work closely to safely manage highway and pedestrian safety during the construction phase.

The EIA and following CMP should identify any mitigation measures necessary to address any significant effects during the construction phase of the proposed development.

MCC Highways would also request that a Construction Environmental Management Plan (CEMP) is conditioned with any planning approval. It is therefore recommended that the CEMP is updated to incorporate the following which are usually required within a CMP which would work to further reduce environmental impacts:

- o The duration/phasing of construction works and associated vehicle trips;
- o Routing of construction traffic and associated swept-path assessment;
- o Details of the location and arrangements for contractor parking;
- o The identification of the vehicular access points into the site;
- o Traffic Management measures for vehicles, pedestrians and cyclists;
- o Manage and coordinate construction activities with reference to ongoing/imminent construction works in the locality;
- o Identify measures to control dust and mud including on the surrounding public highway including details of how the wheels of contractor's vehicles are to be cleaned during the construction period;
- o The details of an emergency telephone contact number for the site contractor to be displayed in a publicly accessible location; and
- o Highway dilapidation survey including photographs and commentary on the condition of carriageway/footways on construction vehicle routes surrounding the site.

The Applicant should also note that MCC Highways also require information on proposed outline electricity/utility connection works and associated traffic management proposals prior to determination. This should be included within the submitted TA and also assessed as part of the EIA scoping process.

Highways Reference: 17199/FO/2025