PLOT H, Charles Street, Manchester

EA PLANNING CORRESPONDENCE

REPORT ISSUE TABLE

Purpose of Issue	Revision	Date	Prepared By	Checked By
EA COMMENTS	P01	17/09/2025	AY	HB

Roscoe Comments – Provided 17th September 2025.

Roscoe comments have been provided to each comment in purple.

EA Comment 1.01-

The proposed development is situated in Flood Zone 2 and is of a spatial area of greater than 0.5ha (major development threshold criteria), as per paragraph 178 of the National Planning Policy Framework (NPPF), unless exempt (not applicable in this instance), it is required that any proposed development/application made is supported by a suitably comprehensive site-specific (redline boundary) Flood Risk Assessment (FRA). A check of the planning portal for 143741/FO/2025 confirms that an FRA has not be supplied and from review of wider project correspondence (EIA scoping), I cannot see indication/confirmation that an FRA has been prepared.

ROSCOE Response 1.01

We have provided a detailed FRA for the enabling works to satisfy this comment. Please refer to document “25415-00-00-DR-C-09001 – Enabling Works FRA”.

EA Comment 1.02 & 1.03-

Respective to the 'full planning permission' nature of the proposed development, no drainage strategy document (indicative or otherwise final) has been formally submitted. Noting identified potential contamination risk, in cognisance to controlled waters protection needs, we need to understand whether there is the potential for infiltration occurrence and how surface water drainage for the site area is to be achieved in its interim state of being prior to redevelopment.

No firm details are provided as to how surface water arising during demolition works is to be suitably managed i.e. preventing risk of contaminant mobilisation via potential discharge to ground. Ultimately as above, we would seek that the potential for infiltration drainage is controlled whilst land contamination risk remains unknown/uncertain.

ROSCOE Response 1.02 & 1.03

We have provided a drainage strategy which is appended to the FRA which confirms that the demolition proposes to remove the existing basement and substructure (including slab) creating permeable pathways for surface water. Please refer to document "25415-00-00-DR-C-09001 – Enabling Works FRA".

The Phase 1 desk study advises that there are minimal potential sources of contaminants, solely associated with previous use as car garages and as such any contaminants would be expected to be at shallow depth (potentially even removed as part of the basement excavation during construction of the car park). As part of the demolition, all substructures are to be removed and all material excavated is to be screened for contaminants and, if found, be replaced by the clean 6F2 which will be formed from the demolition arisings. This affectively sanitises the site from a contamination perspective and ensures the demolition does not pose a risk to controlled waters below the site

EA Comment 1.04 & 1.05-

Wider the issues detailed above, which are preventing of the EA offering more immediately a position of ‘no objection’ to the formal planning application, to shape an efficient future EA formal planning response to 143741/FO/2025 once the above issues are sufficiently addressed, it would be generally useful to understand/discuss the aims objectives of the ID project team for any subsequent planning approval granted. Currently, noting that demolition works proposed include the removal of the existing MSCP and sub-surface excavations (basement feature removal), further to the initial preliminary geo-environmental desktop study currently submitted, we would likely be minded requiring inclusion of land contamination pre-commencement condition(s), with the exclusion of demolition works to slab level.

Additionally, whilst not directly with the remit of planning, I would advise that it would be worth sense-checking that your chosen construction/demolition contractor is clear on the criteria / requirements for material re-use noting from the contents of the current Demolition Environmental Management Plan submitted that there appears to be an intention to utilised site-won demolition materials (exact suitability unknown at this stage) to temporarily backfill the resulting basement void. Further, dependent upon the depth of excavation versus groundwater level, there may exist a dewatering requirement/licence need for associated belowground operations.

ROSCOE Response 1.04 & 1.05

We would welcome a discussion around this as the current plan is to demolish the building, backfill and then undertake a full site-specific Phase 2 site investigation that will include for a full suite of contamination testing (and production of an associated remediation strategy if required) ahead of the main project. We assume that the pre-commencement condition would relate to that project rather than demolition as we cannot test beneath the building footprint without demolition.

A Phase 2 site investigation (Preliminary Ground Investigation Interpretive Report and Final Factual Report UNMC-ARUP-ZZ-XX-RP-CG-0004 produced by Arup) was undertaken by Bruntwood for the wider site which included some investigation in the vicinity of our site (BHs 13 and 14 on site, with BH4 reasonably close by on the other side of Sackville Street). This report states that extensive contamination is unlikely and that “based on the data collected it is considered likely that a large proportion of the soils on site would be chemically suitable for use within this predominantly commercial scheme with minimal mitigation“.

With regards to groundwater levels, the Phase 2 site investigation which was undertaken by Bruntwood for the wider site included some investigation in the vicinity of our site (BHs 13 and 14 on site, with BH4 reasonably close by on the other side of Sackville Street). Ground water monitoring was undertaken which showed a groundwater level of approximately +28.00m. Whilst we do not yet know the foundation construction of the carpark structure it is unlikely that excavations will reach the ground water level as the lowest level of the existing carpark slab is at c. +32.60m.