ASTEER PLANNING
55 Mosley St,
Manchester
M2 3HQT
+44 (0)7453 326001

www.asteerplanning.com

Rob Griffin
Principal Planner
Development Management South
Planning, Licensing and Building Control
Growth and Development Directorate
Manchester City Council
PO Box 532
Manchester
M60 2LA

Reference: EIASCO/24/006

Copied via email to: Julia Johnson
[Julia.Johnson@trafford.gov.uk]

Date: 5th December 2024

Dear Rob,

RESPONSE TO CONSULTEE COMMENTS RECEIVED UNDER SCOPING REQUEST EIASCO/24/006 UNDER THE TOWN AND COUNTRY PLANNING ENVIRONMENTAL IMPACT ASSESSMENT REGULATIONS 2017 (AS AMENDED)

Land at Ryebank, Chorlton, Greater Manchester - Residential Development

A request for an Environmental Impact Assessment (EIA) Scoping Opinion was submitted to Manchester City Council (MCC) on behalf of Step Places, Southway Housing Trust and Manchester Metropolitan University (MMU) (the Applicants) on 5th November 2024 (EIASCO/24/006) in relation to a planning application for residential development at Ryebank, Chorlton. The request described the site context, the nature and purpose of the Proposed Development, and identified the proposed scope and structure of the ES for MCC's consideration.

It is proposed that an Environmental Statement will be prepared to accompany this planning application, within which the following disciplines are anticipated to be assessed;

- Ecology and Arboriculture
- Socio-economics and Health
- Climate Change

At the time of writing, MCC have not yet issued their Scoping Opinion. However, since submission of the Scoping Report MCC contacted various statutory consultees as part of the Scoping exercise and a number of specific comments have been made by MCC and associated consultees, as summarised in Table 1 below. The Applicants response to the comments raised so far is provided in the table for discussion and agreement with MCC. This table also identifies where these comments, where relevant, will be addressed within the submitted application documents.

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Table 1: Consultee Responses

Consultee	Summary of Comments / Discussion	Applicant Response
MAG Group Aerodrome Safeguarding Team 8/11/24	The site lies within the aerodrome safeguarding zone for Manchester Airport. The elements of the proposed development that have the potential to impact upon aerodrome safeguarding are as follows: • Lighting - All exterior lighting designs will need to be mindful of the need for all lights to be capped at the horizontal with no upward light spill. We will need to re-view the details of the lighting when they are available. Our perspective is to mini-mise lighting that is distracting or may cause an ocular hazard to pilots. • Wildlife – Any proposals for open water have the potential to attract and support hazardous gulls. This can be managed by careful design and regular monitoring to ensure that the population of species of birds that are hazardous to aircraft do not increase. Our perspective is to prevent any increase in the number of these hazard-ous birds in the vicinity of the aerodrome that would increase the risk of a Birdstrike. • Tall Equipment –attention is drawn to the procedures for crane and tall equipment notifications, please see: https://www.caa.co.uk/Commercial-industry/Air-space/Event-and-obstacle-notification/Crane-notification/ • BNG – if there is any requirement to meet BNG targets off-site, we would need to be consulted on those plans if they will lie within 13km of Manchester Airport.	Noted. Comments will be addressed within the application submission documents. No further action required in relation to the scope of the EIA.

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United Utilities 14/11/24	The key areas for consideration by the applicant in the detailed design process and in the preparation of a planning application can be summarised as follows: • **Asset protection** for existing significant infrastructure which is located within the proposed redline boundary including water and wastewater assets; • **Easements** crossing the proposed development site and encroachment of United Utilities land; • The delivery of sustainable **foul and surface water drainage proposals**	Comments will be addressed within the Flood Risk Assessment and Drainage Strategy (Renaissance, 2024). No further action required in relation to the scope of the EIA.
MCC Highways 28/11/24	***MCC Highways – Comments in relation to EIA Scoping Request EIASCO/24/006*** *The EIA Scoping Report confirms that the proposed development will be supported by a Transport Assessment.* *The EIA Scoping Note confirms that the Transport Consultant met with the Council during the pre-planning process to seek an agreed approach to the TA with MCC and TfGM. It is also noted that a Stage 1 RSA will be provided at planning stage, for the proposed wider highway and footway works as part of the proposals. For the avoidance of doubt the Transport Assessment should comprise of:* • *A multi-modal trip generation assessment with further detail on anticipated public transport, pedestrian and cycle distribution/routes/capacities;* • *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;* • *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;* • *Provide justification for the proposed level of car parking (including disabled/pool car provision). Parking bays and aisle widths will need to align with MCC standards. Swept-path assessments may also be required;* • *Swept path analysis of the proposed visitor parking areas (as discussed at pre-app stage). Also to include justification of the safety of these parking areas and result of the S1 RSA.* • *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;*	Construction movements are usually limited to regular but low-level traffic volumes over a course of a working day and are comprised of contractor cars, light goods vans, and larger vehicle movements. Construction activity typically occurs prior to the morning peak period and is complete prior to the evening peak period. Construction phase effects are limited in duration and timescale, and access can be controlled by the adoption of a Construction Traffic Management Plan. It is also often found that the number of vehicles generated by the construction phase is lower than the operational phase of a development and this is certainly the case at the development site, other than increased HGV movements. To calculate the level of traffic associated with the construction phase has been forecast using Constructing Excellence 'UK Industry Performance Report: Based on the UK Construction Industry Performance Indicators' and the Building Research Establishment (BRE) advice on the number of operatives on site per day. The former allows a calculation of commercial vehicle movements based on a factor derived from surveys of other construction sites per construction value (taken as 14.7 one-way movements per £100,000 at 2016 prices). The latter is used with the local workforce Census mode share has been used to establish likely mode of travel, which is considered a worst-case estimate as experience

	• *Demonstration that waste and service vehicles can safely utilise the proposed site layout;* • *Undertake a review of Traffic Regulation Orders on the surrounding streets in the vicinity of the development and identification of modifications;* • *Must include details of the proposed TROs across the site to reduce inconsiderate parking at pinch points (to allow the refuse vehicle to manoeuvre around the site) and TROs to reduce inconsiderate parking - as discussed at pre-planning stage.* • *Include information on emergency access routes and how these would integrate with the adjacent highway network and developments;* • *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 notes that although the proposals are likely to give rise to vehicular, sustainable and pedestrian trips that overall there will be no significant effects on the highway network.* *The Note confirms that the assessment is in accordance with IEMA best practice guidance which aims to assist in identifying likely significant environmental effects. The preliminary assessment suggests that the proposed development will not result in a change in site traffic that exceeds IEMA significance / screening thresholds and therefore, Transport has been scoped out.* *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*	suggests that site operatives tend to vehicle share more than, say, office commuters. Based on the above method, it is forecast that during the construction phase the site has the potential to attract 61 vehicles per day (each way), or 123 total trips (in and out). Of these it is estimated that, 4 vehicles will be HGV (each way), or 8 total HGV trips (in and out). The method for assessing the environmental effects of a development is based on the Institute of Environmental Management and Assessment (IEMA) 'Environmental Assessment of Traffic and Movement' guidance published in 2023. IEMA recommends that two broad rules of thumb as criteria to assist in delimiting the scale and extent of the environmental assessment. • Rule 1: include highway links where traffic flows will increase by more than 30% (or the number of HGV will increase by more than 30%). • Rule 2: include any other specifically sensitive areas where traffic flows have increased by 10% or more. IEMA recommends that as a starting point, a 30% change in traffic flow represents a reasonable threshold upon which to base a decision on whether to assess environmental effects in an EIA. Vehicular access to the site during the construction phase is likely to be via Longford Road. Daily traffic data for Longford Road (E) and Ryebank Road (S) is available from the surveys undertaken for the Transport Assessment, and daily traffic flow data is available for Edge Lane (E and W) from the Department for Transport Count Database. Using this data it can be shown that total traffic flows on these links will not increase above either

	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."* ***MCC Highways – 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 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.* ***Parking Restrictions:*** *No TROs are in place along Longford Road. A 20mph speed limit is in place along Longford Road.* *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.* *Traffic calming and TROs may be required along Longford Road to the junction with Oswald Road.* *It is requested that TROs are in place within the site (particularly pinch points) to ensure waste vehicles can manoeuvre on the adopted highway.* *It is also requested that TROs are in place at junctions and throughout the site to reduce inconsiderate parking.*	Rule 1 or Rule 2 during the construction phase (maximum change of 8% on the immediate access links and less than 1% on Edge Lane). HGV traffic will increase by a maximum of 14.4% on the immediate access links and just over 1% on Edge Lane, when compared to the existing level of HGV traffic. However, the level of increase is still below the Rule 1 threshold and does not reach 30% (slight), 60% (moderate) or 90% (significant) changes as set out in the IEMA guidance. Further, the development will be required to adopt a Construction Traffic Management Plan to ensure a safe, efficient and environmentally considerate construction practices. This will include measures to manage access to the site by larger vehicles to appropriate times and vehicle routeings so as to minimise effects on the surrounding area and other transport network users. As a result, no significant adverse effects are anticipated in relation to construction traffic and it is not considered that construction traffic requires assessment within the EIA. In relation to the general comments raised, these comments will be addressed within the application submission documents, including the Transport Assessment and Travel Plan (SK Transport, 2024). As no significant adverse effects are anticipated in relation to transport during construction or operation, no further action is required in relation to the scope of the EIA.

	Vehicle Parking & Access: *The vehicle access strategy is based on dual access provision. It should be ensured that the internal roads and footway meets MCCs adoptable standards of 5.5.m carriageways and 2m footways. Swept paths should be provided to demonstrate that vehicles can manoeuvre safely around the site and waste vehicles can access, manoeuvre and egress.* *If any upgrades are proposed to the access points, it would be expected to see visibility splays to ensure that there is good visibility. Any amendments to the access would need to be done as part of a Section 278 agreement.* *The car parking spaces for each use class will be required to be detailed and justification be provided. It should be noted that all individual driveway parking spaces should be a minimum of 3.0m x 6.0m to ensure that vehicles / pedestrians do not impact on the adopted highway. It should be noted that all car parks should all accord with MCC's standard minimum requirement. It is recommended that standard parking bay dimensions be a minimum of 2.4m x 4.8m and disabled parking bay dimensions a minimum of 3.6m x 6.0m. This should also include a 6-metre aisle width to allow vehicles to safely manoeuvre within the car park with formal demarcation of all spaces. Swept path drawings should demonstrate that a large car and van can access, egress and manoeuvre from the site and the access points. Highways would not accept any vehicles reversing into/out of the development.* *MCC Highways would not accept areas of shared surfacing.* ***EV Parking:*** *It is requested that the Transport Assessment provide details of the proposed level of EV Charge to be provided for each use class and justification should be provided. It is requested that driveway parking spaces have the provision for Electrical Vehicle* *charging points (minimum 7kW). A minimum of 20% of the total number of spaces within apartment schemes (if in a communal car park arrangement) should be fitted within EV charge points (min 7KW). It should also be ensured that ducting infrastructure is installed to allow future EVC installation. There should also be a commitment to monitoring usage within the Travel Plan and increasing the provision when necessary.*	

	Waste and Service Management: *The Transport Assessment should provide details on where bin stores are proposed for each dwelling type. These must meet MCCs GD04 guidance and must not be located on the adopted highway.* *The Transport Assessment 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 noted some areas to the eastern extent of the site where the carriageway narrows due to proposed SUDs. It is noted that swept path analysis was undertaken for a refuse vehicle but appears to be very tight. The site will need to provide TROs in these areas to stop vehicles from parking here and impacting the refuse vehicle movements. It is recommended that double yellow lines are in place on the adopted highway to ensure that inconsiderate parking does not take place. If the development site proposes any private waste collection then it is requested that details of this are also provided.* *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.* *The TA should also reference pick-up/ drop-off activity associated with the site, both in terms of taxi movements and small-scale home deliveries.* *It is requested that a service management strategy is submitted as part of any future planning application.* ***Off-Site Highways Works*** *A S278 agreement would be required for any works to the adopted highway. The minimum standard S278 technical approval timescale is between 4-6 months and, if TRO's are included, can take 12 months . No works are able to take place 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:* *Licensing - Permission to work on the highways - section 278 agreements | Manchester City Council* *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, it is expected that achieving these standards is demonstrated. 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.* *For any future planning application for these proposals a Stage 1 Road Safety Audit (RSA 1) is requested to inform the preliminary design. This ensures that any underlying highway safety issues have been identified and mitigation is proposed accordingly. The scope and study area of the RSA1 would be agreed on a site by site basis however, as a minimum, it is expected to include the following:* • *5 years of accident history* • *Audit of key pedestrian routes (crossing points, footway widths, condition etc.)* • *Audit of key cycling routes (ASLs, cycle lanes etc.)* • *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.*	

	Travel Plan *A Framework Travel Plan should be submitted as part of any future 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:* • *A travel plan budget and resources for the implementation and day to day management of travel plan measures;* • *Appropriate management structures;* • *Detailed time frames for the delivery;* • *Handover arrangements for the travel plan or its components when the developer's responsibility ceases; and* • *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.* ***Construction Management:*** *The EIA and CEMP should identify any mitigation measures necessary to address any significant effects during the construction phase of the proposed development.* *MCC Highways are also likely to request a Construction Environmental Management Plan (CEMP) be provide before any future development takes place. Any CEMP should incorporate the following :* • *The duration/phasing of construction works and associated vehicle trips;* • *Routing of construction traffic and associated swept-path assessment;* • *Details of the location and arrangements for contractor parking;* • *The identification of the vehicular access points into the site;* • *Traffic Management measures for vehicles, pedestrians and cyclists;* • *Manage and coordinate construction activities with reference to ongoing/imminent construction works in the locality:*	

	• *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;* • *The details of an emergency telephone contact number for the site contractor to be displayed in a publicly accessible location; and* • *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. This should be included within the submitted TA and also assessed as part of the EIA scoping process.*	
Greater Manchester Archaeological Advisory Service (GMAAS)	Thank you for consulting GMAAS on the above request for a Scoping Opinion regarding archaeological considerations associated with Ryebank Fields. The proposal site does not contain any designated heritage assets but is of considerable archaeological interest as it is traversed by a large negative earthwork that may represent the remains of an ancient boundary or defensive feature referred to as the Nico Ditch. The Nico Ditch is a curvilinear earthwork that on typological and etymological grounds is believed to be of pre-Norman Conquest in origin. It extends for c.5km around the southern edge of Manchester city centre from the border with Audenshaw / Denton in the east to Platt Brook in the west, although is only visible as a feature of the modern landscape in a small number of places. The eastern terminus of the earthwork is commonly agreed to be Ashton Moss, close to Denton Golf course in Tameside, whilst the western terminus has been placed in Platt Fields, on the edge of the former moss land of Hough Moss; sections of the surviving ditch in both of these locations have been designated Scheduled Monuments on account of their national significance. Where it survives as an earthwork, the Nico Ditch comprises a U-shaped channel 2m to 3m wide and 1.5m to 2m deep, with a low bank on its northern side. It has been suggested that the Nico Ditch likely continued westwards from Hough Moss, through Ryebank Fields and Longford Park to Chester Road, to form a series of ditch and moss barriers from the River Irwell in the west to the River Medlock in the east. It has been noted in support of this suggestion that the position of the earthwork on Ryebank Fields is on a similar alignment to the excavated section of Nico Ditch in Platt Fields, and	**Archaeology** It is accepted by the Applicant team that archaeology is a topic that warrants further investigation as part of the EIA process and this will be scoped in as a technical chapter The Applicant team provide a commitment to the LPA to undertake the archaeological investigation of the ditch in the form of an archaeological evaluation, as recommended by GMAAS, in order to understand the origins and state of preservation and therefore potential significance and subsequent impact of the proposals upon the ditch, which at the moment, given current understanding, has been assessed as being of low to medium significance. A 'Project Design' (PD) as required by GMAAS will be produced by WA in consultation with GMAAS and form a technical appendix to the ES Chapter. The PD will be cognisant of the results of the ecological surveys, and as such a coordinated approach will be undertaken and agreed in advance with GMAAS and all other relevant consultees. In addition, the results will inform potential archaeological mitigation requirements, which will be agreed with GMAAS.

	to the west of a long straight ditch on the boundary between Urmston and Stretford described on mid-20th century mapping as 'Nico Ditch'. Whilst the sequence of historic mapping shows that much of the proposal site was subject to clay extraction associated with a brick works during the 20th century, the course of the earthwork was respected and seemingly left intact. Indeed, the earthwork across Ryebank Fields has been recorded recently to be c.26m long and between 10m and 12m wide with a broadly U-shaped profile, whilst an auger survey carried out in December 2019 demonstrated that buried ditch fills survive to a depth of up to 1m beneath the modern surface. The request is supported by an EIA Scoping Report prepared by Asteer Planning, dated November 2024. The report concludes that 'cultural heritage', presumably comprising the historic built environment and below-ground archaeological remains, should be 'scoped out' of the EIA process. A brief rationale for this conclusion is presented in a short section on Heritage and Archaeology, embedded in Chapter 10, which cites an unsuccessful application to Historic England in 2019 to consider the earthwork in Ryebank Fields for designation as a Scheduled Monument. This application was rejected as the ditch did not appear to survive well and that its archaeological potential was uncertain due to a lack of intrusive investigation, leading the author of the Scoping Report to conclude that 'there is no evidence to reasonably indicate the potential for the presence of archaeological remains which would preclude development and result in significant effects for the purposes of EIA.' What the author failed to quote, however, was Historic England's advice that 'although not recommended for scheduling at this time, the site is clearly of strong local importance. If further investigations provide evidence of the site's potential national importance, then it could be reassessed for scheduling at that time.' This acknowledges that the earthwork has potential to yield significant new information, which awaits corroboration through intrusive investigation. Pending the results from any such investigation, footnote 72 in Chapter 16 of the National Planning Policy Framework may prove relevant: 'non-designated heritage assets of archaeological interest, which are demonstrably of equivalent significance to scheduled monuments, should be considered subject to the policies for designated heritage assets.' GMAAS will defer to the Conservation and Design Team at Manchester City Council for an opinion on any potential harm of development to the historic built environment and the setting of designated heritage assets. It is notable, however, that the Scoping Report makes no mention of the Longford Conservation Area, which borders the western edge	**Built Heritage** The Heritage Statement prepared by Stephen Levrant Heritage Architecture and which will support the planning application as a standalone report demonstrates that there will be no significant effects on the historic built environment. The adjacent Longford Conservation Area to the west of the Site boundary will be subject to a neutral impact (not significant) on its setting and subsequent significance from the Proposed Development, due to the presence of a bank and dense mature planting at the boundary between the Conservation Area and the Site which substantially limits intervisibility between both sites. As, such, it is not considered that the topic of Built Heritage requires assessment within the EIA.

	of the proposal site in the neighbouring district of Trafford, although a commitment is made to preparing a Heritage Assessment to support a future planning application. There is no such commitment in the Scoping Report to carry out any further investigation of the site's archaeological resource beyond a desk-based assessment that was prepared by Wardell Armstrong in June 2020, coupled with a limited programme of auger sampling in December 2019. The report concluded that there is 'no evidence to indicate the presence of archaeological remains within the boundary of the Site which would be of high/national importance', although presumably this is based on an assumption that the earthwork across Ryebank Fields is not part of the Nico Ditch; the assessment suggests that the earthwork could have formed part of the Carr Ditch, which was first recorded in the 17th century and marked the boundary between the townships of Urmston and Flixton. However, whilst the alignment of the Carr Ditch follows that of the Nico Ditch, it is believed to be offset to the north by approximately 100m. Establishing the broad construction date and original form of the earthwork across Ryebank Fields is crucial to elucidating the significance of the monument. GMAAS accepts that further investigation may demonstrate that the earthwork did not form part of the Nico Ditch, or it has been subject to reworking that has removed any physical evidence for a pre-Norman Conquest construction date but, on the information available to date, the potential for the earthwork to be of high / national importance cannot be discounted. This uncertainty, moreover, can only be resolved via intrusive archaeological investigation. In view of the potential importance of the earthwork and the resultant possibility for significant effects from the proposed construction works, GMAAS is of the opinion that archaeology is a topic that warrants further investigation as part of the EIA process and should be scoped in. GMAAS is aware that the desk-based assessment prepared in 2020 will be updated to support a future planning application, but further desk-based work is very unlikely to contribute a better understanding of the origin and significance of the earthwork. This will necessarily require intrusive investigation to assess the character, date, survival and significance of any archaeological deposits. Any such scheme of intrusive investigation should be devised in consultation with GMAAS and undertaken by an appropriately qualified and experienced archaeological contractor. The data generated from an intrusive investigation of the earthwork will be crucial to informing the design proposals, any archaeological mitigation measures required and interpretation, and should thus be implemented as part of the EIA process and certainly	

	prior to submitting a planning application. Ideally, the intrusive investigation will be designed to engage local interest groups in order to maximise the opportunity for public benefit.	
MCC Environmental Health	"We have looked at the scoping report and agree with noise, air quality and contaminated land being scoped out. We do expect associated assessments/reports to be provided with the planning application for these topics. Following a number of enquires to the team we will be expecting a detailed risk assessment to be provided with regards to the management of contamination on the site, in particular asbestos. Not just during the development but also within the woodland areas around the perimeter of the site where asbestos containing materials have been regularly identified. The woodland is being retained so their remediation strategy will need to include the woodland areas with regards to the asbestos contamination. We will be raising this within our formal comments in relation to any planning application."	Noted. Noise, Air Quality and Contaminated Land reports will be provided on submission of the application. No further action required in relation to the scope of the EIA.
Lancashire Wildlife Trust 26/11/24	I have had the opportunity to view the above request for scoping opinion for the EIA and would like to provide the following observations. Section 7: Ecology and arboriculture. Paragraph 7.2 directs consultees to the individual ecological reports listed within section 7.3. Unfortunately, these survey documents do not appear to be available on the planning portal. It would be very useful, in fact necessary, to view these documents for comment. Paragraph 7.12 describes what would appear to be an interesting mosaic of habitat types containing habitat interfaces and eco-tones. As above, it would be interesting and beneficial to view the individual ecological survey documents. Paragraphs 7.19 and 7.20 indicate that there is a high baseline BNG for area-based habitats. It would be useful to know the individual habitat scores, especially for grassland habitats, as paragraph 7.11 indicates that the majority of the site was defined by a large parcel of other neutral grassland, spanning much of the sites central habitat.	Copies of the ecological reports mentioned will be provided to Lancashire Wildlife Trust on submission of the planning application, which form a technical appendix to the ES. All other comments are noted and will be addressed in the ES and associated planning application documents. NE advice will be followed. In addition, the LNRS will be referenced and addressed in ES.

	Within the habitats section on the discussion of 'Potential Effects (including identification of specific receptors) there is no reference to the grassland habitat itself. Vascular plants species have been scoped out as there are no specific legally protected species, but the grassland habitat should be viewed as important in its own right. Grassland habitats are under serious threat within Greater Manchester and the impact of development on the extent of grassland habitats should be a cause for concern. Paragraph 7.11 has identified that grassland is the main habitat type within the site area and the potential impact on this habitat needs to be assessed. Paragraph 7.71 within the preliminary discussions of Potential Mitigation and Enhancement Measures describes that some of the badger setts would require closing. This indicates that the development would impact on the badger population in some way and I would question that such a necessary action undermines the wisdom behind the development in the first place. The advice provided by Natural England and the local badger Trust will need to be strictly adhered to. Paragraph 9.38 of the climate change resilience assessment refers to a workshop identifying inherent and additional mitigation measures that might be required. I would suggest that for habitats, this should include potential adverse impacts on habitat and species and the need to ensure adequate corridors where species can move, expand and migrate in response to climate change. Paragraph 9.39 indicates that a workshop will be held with the design team to run through the climate resilience assessment and to identify inherent and additional mitigation measures. This should include the provision of wetland habitats, incorporating them into any proposed SUDS designs. Habitats created could include reedbeds, wet grasslands and ponds. With regards to the missing information outlined above, the information needs to be provided either during this or the next stage of the EIA process. I would also query why the Local Nature Recovery Strategy (LNRS) has not been referenced. Whilst within the draft LNRS, it would appear that Ryebank Fields has not been included within the opportunity mapping area, the LNRS is only at the draft stage and there is some argument to be made for the inclusion of Ryebank Fields as part of the local nature recovery network. The site is contiguous with land that has been included within the LNRS mapping and certainly helps to form part of the corridor in this locality. Notwithstanding the absence of the site within the LNRS, the EIA should be	

	providing information and detailing how the development can strengthen and enhance the nature network in the area. I hope these comments prove useful. If you have any further queries or require clarification, please do not hesitate to contact me.	
Environment Agency 18/11/24	No comments	Noted. No further action in relation to the scope of the EIA.
MCC Flood Risk	The proposed EIA scope is accepted on the basis of the project commitments as-defined in the following sections: • 10.24 (provision of a standalone Flood Risk Assessment and Drainage Strategy to support the Planning application.) A Flood Risk Assessment and Drainage Strategy must be submitted to support the Planning Application. This should demonstrate design compliance with national and local policy. Our asset register indicates that the "Longford Brook / Nico Ditch" ordinary watercourse crosses the site. This may be in open channel and underground culvert. Our records can be released under our £150 Data Screen Service. • Further investigation is required, and the development proposal should account for its presence, including an appropriate masterplan with easements. • Proposed alterations which could affect flow will require Land Drainage Consent approval. • We advise that inappropriate consideration of ordinary watercourses can result in objection to the Planning Application. It is recommended that a pre-application consultation is held with the LLFA - this can be arranged via the Planning Officer.	Noted, a Flood Risk Assessment and Drainage Strategy is being prepared to support the application which will demonstrate compliance with policy. No further action in relation to the scope of the EIA.

ASTEER PLANNING
55 Mosley St,
Manchester
M2 3HQT
+44 (0)7453 326001

www.asteerplanning.com

In summary, the consultee comments received so far will be addressed within the ES where relevant. In response to comments regarding construction traffic and heritage impacts being assessed within the EIA, as set out in Table 1, no significant adverse effects are anticipated in relation to these topics and it is not considered that these topics require assessment within the EIA.

It is accepted by the Applicant team that Archaeology is a topic that warrants further investigation as part of the EIA process and this will be scoped in as a technical chapter.

As a result, the revised scope of the EIA will address the following disciplines;

- Ecology and Arboriculture
- Socio-economics and Health
- Climate Change
- Archaeology.

Should you have any queries, or further comments regarding the responses provided, please do not hesitate to contact me.

Yours sincerely,

Josh Thomas
Associate Environmental Planner

For and on behalf of Asteer Planning LLP

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Registered office, 45-53 Chorley New Road, Bolton, BL1 4QR