

Josh Thomas
Asteer Planning
Mynshulls House
14 Cateaton Street
Manchester
M3 1SQ

Via email only
[REDACTED]

Planning

Julie Roscoe
Director of Planning, Licensing and
Building Control
Growth and Neighbourhoods Directorate
Town Hall Extension
Manchester
M60 2LA

Contact officer: Rob Griffin
Telephone: 0161 234 4527
Email: robert.griffin@manchester.gov.uk

Date: 2nd January 2025

Our Ref: EIASCO/24/006

Dear Josh Thomas,

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

**RE: REQUEST FOR A FORMAL OPINION ON THE SCOPE OF AN ENVIRONMENTAL
STATEMENT (ES) UNDER REGULATION 15 OF THE ENVIRONMENTAL IMPACT
ASSESSMENT REGULATIONS 2017 (as amended)**

DEVELOPMENT PROPOSALS CONSISTING OF:

Residential Development of Land at Ryebank Fields, Chorlton, Greater Manchester

I write in response to your formal request for a scoping opinion from the City Council as local planning authority in relation to a proposed development of Land at Ryebank Fields, Chorlton, Greater Manchester by Step Places, Southway Housing Trust and Metropolitan University ("the applicants"). This request has been accompanied by an EIA Scoping Report and additional response to consultee comments prepared by Asteer Planning, which confirms the applicant's intention to submit an Environmental Statement (ES) in support of a forthcoming planning application for the proposed development. It is noted that part of the site of the proposed development is within the Trafford Council administrative area, acknowledgement of this should be clear within the ES.

The purpose of any submitted ES is to determine if there is a likelihood for significant environmental effects arising from the proposed development. Planning Practice Guidance (PPG) published by the Government confirms that: "Whilst every Environmental Statement should provide a full factual description of the development, the emphasis should be on the "main" or "significant" environmental effects to which a development is likely to give rise." PPG also confirms that "the Environmental Statement must include the information that may reasonably be required to enable the local planning authority.... to come to a

reasoned conclusion on the significant effects of the proposed development on the environment.”

The ES Scoping report that has been submitted includes the potential content or ‘scope’ of the ES that is to be submitted to accompany a planning application for the proposed development.

In formulating this Scoping Opinion, the City Council, as Local Planning Authority, has taken account of: the requirements of the EIA Regulations; the nature and scale of the proposed development; the nature of the receiving environment; current best practice in the preparation of environmental statements; and, the responses by the organisations and bodies that responded to consultation on the Scope of the proposed ES.

The Council confirms that following an assessment of the submitted EIA Scoping Report ‘Ryebank Fields – ‘Residential development’ prepared by Asteer Planning as received on the 6th November 2024, together with the ‘Response to consultee comments’ again prepared by Asteer Planning and received by the City Council as local planning authority on the 5th December 2024, the amended scope of the proposed ES is satisfactory to the City Council as local planning authority.

This Scoping Opinion is without prejudice to any decisions subsequently taken in respect of any planning application submitted in respect of the Proposed Development.

Consultations

Regulation 15 (4) of the EIA Regulations require the City Council, as Local Planning Authority, to consult appropriate bodies prior to adopting a Scoping Opinion. A number of statutory consultees have provided advice and comments in response to the Scoping Opinion request, many of which are likely to be considered and assessed within technical reports and surveys that would accompany any planning application for the proposed development that would sit outside of the ES.

All responses of the consultees contacted by the City Council, as Local Planning Authority, during the EIA scoping process are appended to this letter, and these should be considered as part of the formulation of the ES and technical reports to be prepared in support of any planning application for the proposed development.

The scope and structure of the ES

The Scoping Report sets out the intended scope and structure of any Environmental Statement (ES) to assess any likely significant effects on the environment by the proposed development. This assessment would involve establishing the baseline condition of the site and its surroundings and compare this with the scenario once the proposals are in place.

The following matters have been identified to be scoped into the ES for the development within the submitted scoping report:

- Biodiversity (Within a chapter relating to Ecology and Arboriculture);
- Population (Within a chapter relating to Socio-economic and Health);
- Human Health (Within a chapter relating to Socio-economic and Health);
- Climate Change; and,

- Archaeology

It is confirmed that the scope and matters identified for inclusion within chapters of the ES are agreed by the City Council.

Cumulative developments

Table 3 on page 14 of the ES Scoping Report identifies cumulative developments that are to be considered as part of the ES.

The applicant should also consider to what extent the works to Longford Park in Trafford that lie immediately adjacent the site should be considered as part of the ES process. It is understood that these works were approved under planning permission 110093/FUL/23 by Trafford Council on the 25th April 2023.

There are other approved and proposed developments in the vicinity of the site which may also be considered as part of the overall assessment on cumulative impacts, these include:

- The redevelopment of the Chorlton Leisure Centre site (planning permission reference 136791/FO/2023) on Manchester Road, Chorlton - works to implement this residential development have commenced
- The residential development at 4b Albany Road, Chorlton (planning permission reference 136878/FO/2023) demolition works have been completed and construction works is imminent
- Residential and commercial development at Brixham Road Stretford Manchester M16 0YG (planning application reference 114228/FUL/24) – Not yet determined
- The emerging proposals for residential led redevelopment of the former Chorlton Precinct in Chorlton District Centre
- Proposals set out within the Trafford Wharfside Development Framework approved by Trafford Council.

Proposed ES Chapters

Ecology and Arboriculture

The scope of the proposed ecology and arboriculture chapter of the ES is considered to be acceptable.

Socio-Economics and Health

The scope of the proposed Socio-Economic and Health chapter of the ES is considered to be acceptable.

Climate Change

The scope of the proposed Climate Change chapter of the ES is considered to be acceptable.

Archaeology

Following the observations and recommendations of the Greater Manchester Archaeology Advisory Service, it is noted that the applicant has agreed that this is a topic requiring

further investigation as part of the EIA process and is to be scoped in as a technical chapter within the ES. This is accepted and welcomed by the City Council.

Matters to be Scoped out

The following matters have been identified to be scoped out of the ES for the development within the submitted scoping report:

Landscape and Visual; Transport and Access; Noise; Air Quality; Flood Risk and Drainage; Ground Conditions and Sils; Waste Materials and Assets; Lighting; Accidents and Disasters; Wind; and, Daylight and Sunlight.

Your comments on these matters are noted and the City Council is in agreement that these matters can be scoped out of the ES. Whilst these matters have been scoped out of the ES for EIA purposes they would be considered through separate technical reports, where required, and these should be submitted as standalone documents in support of any submitted planning application for the proposed development.

This scoping opinion relates to the requirements for inclusion within an Environmental Statement to accompany a planning application for the proposed development only.

I trust this information is of some assistance to you. Should you require anything further please do not hesitate to contact **Robert Griffin**.

Yours sincerely,

Derek Jones
Strategic Planning and Project Lead
MCC Planning Service

APPENDIX 1 Consultee Responses

Manchester City Council
By email

Your ref: EIASCO/24/006
Our ref: DC/24/2704
Date: 14th Nov 2024

Dear Planning Team

Location: Land At Ryebank Fields Chorlton Manchester.

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.

With reference to the above Environmental Impact Assessment (EIA) Scoping Opinion, United Utilities (UU) wishes to make the following comments at this early stage regarding the expectations for any future proposals. It should be noted that the following comments should be read as expected principles prior to the submission of any future planning application.

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**

We deal with the above matters in further detail below.

Asset Protection

We would like to draw the applicant's attention to the significant water and wastewater assets and legal easements that lie within and near to the application site red line boundary. United Utilities has a large public sewer crossing the site and significant water assets in close proximity

to the site boundary. It is important to note that we will not permit development over or in close proximity to our assets.

Following our review of the proposed development's location, we have concerns that the proposed development is located directly over these assets. The location of our assets will be material to the proposed site layout so it's deemed to be in the applicants' interest to clarify the exact position of these assets prior to the submission of any formal planning application.

We strongly advise that the applicant engages with us at the earliest possible opportunity to identify the assets which may be impacted by these proposals. Our assets will need to be fully considered as part of the design process, with the potential impacts identified at an early stage and suitable mitigation and protection measures and/or diversions incorporated into the design, construction and ongoing operation of the application site. If the applicant hasn't already done so, they can take advantage of our free pre-development service by visiting our website <https://www.unitedutilities.com/builders-developers/your-development/planning/pre-development-guidance/>.

Where United Utilities assets exist, the level of cover to United Utilities pipelines and apparatus must not be compromised either during or after construction and there should be no additional load bearing capacity on pipelines without prior agreement from United Utilities. This would include earth movement and the transport and position of construction equipment and vehicles. Consideration should also be applied to United Utilities assets which may be located outside the applicant's red line boundary. Any construction activities in the vicinity of our assets must comply with our 'Standard Conditions for Works Adjacent to Pipelines', a copy of which can be found on our website, and national building and construction standards. It is the applicant's responsibility to ensure that United Utilities' required access is provided within their layout and that our infrastructure is appropriately protected. The developer would be liable for the cost of any damage to United Utilities' assets resulting from their activity.

Unless there is specific provision within the title of the property or an associated easement, any necessary disconnection or diversion of assets to accommodate development will be at the applicant/developer's expense. In some circumstances, usually related to the size and nature of the assets impacted by proposals, developers may discover the cost of a diversion is prohibitive in the context of their development scheme.

Please note the location of our water and wastewater network on maps is only indicative. We recommend the applicant contacts United Utilities for advice on identifying the exact location of our assets. For advice regarding protection of United Utilities assets, the applicant should contact the teams as follows:

Email: [REDACTED]

Email: [REDACTED]

United Utilities Legal Easements

According to our records there are easements located near to the site which are in addition to our statutory rights for inspection, maintenance and repair. The easement dated 21/02/1962, UU Ref: E040/00331/3 has restrictive covenants that must be adhered to. It is the applicant's

responsibility to obtain a copy of the easement document, available from United Utilities Legal Services or Land Registry. The applicant must comply with the provisions stated within the document.

Under no circumstances should anything be stored, planted or erected on the easement width. Nor should anything occur that may affect the integrity of the pipe or United Utilities' legal right to 24 hour access.

The applicant should contact our Property Services team to discuss how the easements referenced above affect the proposals and that any variations required can be considered at the earliest opportunity. It's advised the applicant contacts [REDACTED]

Foul and Surface Water Drainage Strategy

We strongly recommend that a detailed site-wide foul and surface water drainage strategy is prepared to inform any future planning application at this site. This strategy should fully assess site topography, infiltration potential, all forms of flood risk, existing water features and naturally occurring flow paths to identify where water will naturally accumulate and determine whether pumping may be required. Please note we would wish to limit the number of pumping stations on site in the interests of sustainable development. The strategy also be informed by an assessment of existing ecological and arboriculture areas for protection and enhancement as part of the creation of a network of green spaces. Any surface water strategy should be integrated throughout the development and comprise multi-functional sustainable drainage at the surface level unless underground infiltration is discounted. Green infrastructure and SuDS requirements should be integrated and considered holistically as part of high quality place making. We would not wish to see a predominance of traditional underground piped storage systems as we do not believe this is reflective of high quality place making or a reflection of the intention to deliver a site in accordance with a visionary design code, which is resilient to the challenge of climate change or innovative and creative architecture which is integrated into the landscape.

All development proposals will be expected to fully investigate the hierarchy of drainage options for surface water. There is an opportunity to discharge surface water to a number of watercourses in the vicinity of the site so the minimum expectation is that no surface water will discharge to the public sewer.

It is important for any site layout to be informed by natural fluvial and surface water flow paths having regard to a detailed assessment of site topography and flood risks. The strategy for infrastructure should demonstrate how each phase interacts with other phases of development.

Sustainable drainage can and should be integrated into the development as part of high quality green and blue infrastructure. Landscaping proposals will be expected to demonstrate how they contribute to the objective of sustainable surface water management and this should be identified in the drainage strategy. The design of the high quality multi-functional sustainable drainage should meet the standards for design in the Ciria SuDS Manual (C753). Any drainage strategy should therefore be informed by the detail of other assessments such as ecology and arboriculture.

Landowners and developers will be expected to work together in the interest of sustainable drainage, alongside addressing other site constraints. As development progresses and future phases are brought forward, the overarching drainage strategy must be updated and agreed with the local planning authority to reflect any changing circumstances as each phase of the development comes forward.

Understanding and addressing site constraints and opportunities

The site constraints should be fully understood in the preparation of any masterplan. As part of this, the drainage hierarchy must be fully investigated to assess the discharge options for surface water and outline a strategy for its disposal in the most sustainable way. As set out above we wish for any future approach to development to holistically consider a drainage strategy for foul and surface water having regard to a detailed assessment of site constraints. The masterplan should review these constraints in detail alongside ground conditions and arboriculture to inform the drainage strategy. We also recommend that the masterplan is supported by a detailed phasing plan which sets out which phase will be delivered when and the mix/number of uses to be delivered in each phase. United Utilities would like to understand potential build out rates and the phasing of the development to best inform the drainage strategy and delivery of associated infrastructure

A holistic drainage strategy should be designed around natural flow pathways having regard to watercourses, surface water and groundwater alongside an understanding of topography. The topography review will help to understand the natural flow of water to ensure new development is built around natural flow paths and the risk of flooding to future residents is minimised. Any past flooding incidents should be fully understood. At this early stage, there is a real opportunity to target a reduction in the surface water run-off rate by harnessing the opportunities created by green infrastructure to minimise flood risk and deliver ecological enhancement / biodiversity net gain. It will be important to identify and map all existing land drains and watercourses in liaison with landowners and drawing upon local knowledge.

There will be an expectation for the development proposals to demonstrate a full investigation of the hierarchy of drainage options. As stated, due to more sustainable options within the site, our expectation is that no surface water will discharge to the existing public sewer. We request that a baseline desktop assessment of the potential for infiltration is undertaken at an early stage in liaison with the Lead Local Flood Authority (LLFA).

The applicant must demonstrate how each phase interacts with other phases of development should future applications be delivered in a number of phases. Future applicants/developers are advised to discuss and agree drainage strategies with us at the earliest opportunity via the details provided above.

Other Matters for Consideration

Wastewater Adoption – Including SuDS

If the applicant intends to offer wastewater assets forward for adoption by United Utilities, the proposed detailed design will be subject to a technical appraisal by an Adoptions Engineer as we need to be sure that the proposal meets the requirements of United Utilities' Asset Standards. This is important as drainage design can be a key determining factor of site levels and layout. The proposed design should give consideration to long term operability and give United Utilities a cost effective proposal for the life of the assets. Therefore, should this application be approved and the applicant wishes to progress a Section 104 agreement, we strongly recommend that no construction commences until the detailed drainage design, submitted as part of the Section 104 agreement, has been assessed and accepted in writing by United Utilities. Any work carried out prior to the technical assessment being approved is done entirely at the developer's own risk and could be subject to change.

Water Efficiency, Supply and Metering (if applicable)

United Utilities would like to highlight the benefits of a tighter water efficiency standard in new development. These include a reduction in water and energy use, as well as helping to reduce customer bills. Building Regulations includes a requirement for all new dwellings to achieve a water efficiency standard of 125 litres of water per person per day (l/p/d). In 2015 an 'optional' requirement of 110 l/p/day for new residential development was introduced. We encourage and welcome measures within new schemes to ensure a more efficient use and re-use of water.

To encourage water efficiency, a reduced rate may apply to infrastructure charges for developments which meet specified qualifying conditions. Full details of the qualifying criteria can be found on our website at <https://www.unitedutilities.com/builders-developers/new-connections-and-developer-services/>

If the applicant intends to obtain a water supply from United Utilities for the proposed development, we strongly recommend they engage with us at the earliest opportunity. If reinforcement of the water network is required to meet the demand, this could be a significant project and the design and construction period should be accounted for.

CONTACTS

Website

For detailed guidance on water and wastewater services, including application forms and the opportunity to talk to the Developer Services team using the '**Live Chat**' function, please visit:

<http://www.unitedutilities.com/builders-developers.aspx>

Email

For advice on water and wastewater services or to discuss proposals near to pipelines, email the Developer Services team as follows:

Water mains and water supply, including metering - [REDACTED]

Public sewers and drainage - [REDACTED]

Telephone - 0345 072 6067

Property Searches (for asset maps):

A number of providers offer a paid for mapping service including United Utilities. For more information, or to purchase a sewer and water plan from United Utilities, please visit <https://www.unitedutilities.com/property-searches/>

Water and sewer records can be viewed for free at our Warrington Head Office by calling 0370 751 0101. Appointments must be made in advance. Public sewer records can be viewed at local authority offices. Arrangements should be made directly with the local authority.

Summary

Moving forward, we respectfully request that the Council continues to consult with United Utilities for all future planning applications associated to this site. We are keen to continue working in partnership with all relevant stakeholders to ensure the proposals at South Hindley are delivered in the most sustainable way.

If you have any queries or would like to discuss the above, please do not hesitate to contact me.

We request that a copy of this letter is made available to the applicant.

Yours faithfully



The Planning, Landscape and Ecology Team



Mr R. Griffin
Principal Planner
Development Manager South
Manchester City Council
PO Box 532
Town Hall
Manchester M60 2LA

Date: 26th November 2024

Dear Rob

Application EIASCO/24/006 - Request for Scoping opinion under Part 4, Regulation 15 of The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended) - Land at Ryebank Fields, Chorlton, Manchester

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 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 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.

Yours sincerely

[Redacted signature]

[Redacted name]

Heritage Management Director (Archaeology)

Tel: [Redacted phone number]



The Wildlife Trust for Lancashire Manchester & North Merseyside



The Barn, Berkeley Drive, Bamber Bridge, Preston, Lancashire, PR5 6BY

T: [REDACTED] E: [REDACTED] W: www.lancswt.org.uk

Growth and Development
Manchester City Council
P.O Box 532
Manchester
M60 2LA

26th November 2024

FAO Robert Griffin

Dear Mr Griffin

RE: EIASCO/24/006|REQUEST FOR SCOPING OPINION UNDER PART 4, REGULATION 15 OF THE TOWN AND COUNTRY PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2017 (AS AMENDED)

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.

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.

Yours Sincerely

[Redacted signature]

[Redacted name]

Conservation Officer for Greater Manchester

Email: [Redacted email address]

EIASCO/24/006 - Land At Ryebank Fields Chorlton Manchester

From [REDACTED]
Date Tue 26/11/2024 13:30
To Robert Griffin <robert.griffin@manchester.gov.uk>

Hi Rob,

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.

Kind Regards

[REDACTED]

Environmental Protection
Environmental Health
Neighbourhoods Directorate
Manchester City Council

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

Please note that due to working compressed hours Wednesdays are a non-working day for me, I will respond to your email when I return to the office

We are on X, for news and updates follow us [@EnvHealthMcr](#)

Please consider the environment before printing an e-mail

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Your personal data is very important to us. Please refer to our privacy notice at: www.manchester.gov.uk/privacy for further information.

This footnote also confirms that this email message has been swept for the presence of computer viruses.



Memorandum

To Robert Griffin

From [REDACTED]

Date 28 November 2024

Subject **EIASCO/24/006**

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 proposed development is for 120 residential units and the planning application will seek approval for a proposed residential development including access, car parking provision, open space and landscaping, sustainable drainage features and other associated works.

Access to the site is proposed from the north via Rye Bank Road and from the south via Longford Road and Ryebank Road.

Document Submission

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:

- o A multi-modal trip generation assessment with further detail on anticipated public transport, pedestrian and cycle distribution/routes/capacities;

- 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 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 (including disabled/pool car provision). Parking bays and aisle widths will need to align with MCC standards. Swept-path assessments may also be required;
- o 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.
- 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;
- o Undertake a review of Traffic Regulation Orders on the surrounding streets in the vicinity of the development and identification of modifications;
- o 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.
- 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 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 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:

It is noted that a number of pre-application discussions have taken place between the Transport Consultant, Developer and MCC. With this in mind Highways have provided some general comments below.

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.

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. It is requested that traffic calming and TROs are in place along Longford Road to the junction with Oswald Road.

As per pre-application discussions it is requested that TROs are in place within the site (particularly pinch points) to ensure that the waste vehicle can manoeuvre the adopted highway.

It is also requested that TROs are in place at junctions and throughout the site to reduce inconsiderate parking.

Vehicle Parking & Access:

The vehicle access strategy is based on dual access provision. The dual access arrangement provides one access to the south of the site off Longford Road and the other access from the north of the site off Ryebank Road (N). There will be no vehicle through route between the two access points, other than emergency vehicles.

It should be ensured that the internal roads and footway meets MCCs adoptable standards of 5.5m 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. As per Highways pre-planning discussion there is a stretch of adoptable carriageway where no footway is proposed adjacent to the school. As per these discussions Highways have discussed this layout with MCC Statutory Approvals Team who have stated that in principle this is acceptable on the basis that the rest of the site meets MCCs adoptable standards are in place, appropriate TROs are in place and swept paths demonstrate that cars and waste vehicles can manoeuvre the site safely.

If any upgrades are proposed to the access points, we would expect to see some visibility splays to ensure that there is good visibility. Any amendments to the access will need to be done as part of a Section 278 agreement.

It is requested that the car parking spaces for each use class is detailed and justification is 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.

As per pre-application discussions Highways will not accept areas of shared surfacing. It is understood that the initially proposed shared surfacing space is in the process of being updated to 5.5m carriageway and 2m footways, which is welcomed and acceptable to Highways.

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.

During the pre-application process Highways noted some area to the eastern extent of the site where the carriageway narrows due to proposed SUDs. Although we note that swept

path analysis was undertaken for a refuse vehicle this area does look 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 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.

For this application 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.

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:

During the construction phase of the proposed development, construction traffic management measures will be implemented through a CEMP, which will be secured by planning condition.

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: 16373/FO/2024

RE: Highways response to EIASCO/24/006

From [REDACTED]
Date Tue 10/12/2024 11:14
To Robert Griffin <robert.griffin@manchester.gov.uk>

Hi Rob,

I hope you are well. Thank you for your email and providing that additional information. Please see Highways response below.

FURTHER COMMENTS 10TH DECEMBER 2024:

- Further information has been provided in regard to the effects of the construction traffic.

The updated information has forecasted that during the construction phase the site has the potential to attract 123 total trips per day. Of these it is estimated that 8 trips will be HGV.

The Scoping Report states that the effects of construction and operational traffic have been assessed in consideration of the predicted net change in traffic flows by comparing the likely trip generation of construction and operational traffic against future baseline traffic conditions based on the following IEMA Guideline rules:

- Rule 1 - Include highway links where traffic flows will increase by more than 30% (or the number of heavy goods vehicles will increase by more than 30%); and
- Rule 2 - Include any other specifically sensitive areas where traffic flows have increased by 10% or more.

Any road links that meet these criteria indicate the potential for significant 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.

It is further noted that a Construction Management Plan will be provided. Please note Highways initial comments in relation to CMPs.

It is noted that the general comments Highways provided will be addressed within the application submission documents – thank you.

Many thanks,

[REDACTED]

[REDACTED]
Development Control Engineer
Highways Development Control
Neighbourhoods Directorate

Please Note my Working Hours: Mon - Fri 08:00 - 16:00

Email: [REDACTED]
Phone Number: [REDACTED]
Web: <http://www.manchester.gov.uk>
POSTAL ADDRESS: Manchester City Council, The Highways Service, PO Box 532, Town Hall, Manchester, M60 2LA



Out of Office: PM 12th December, 13th December

Annual Leave: 23rd December – 5th January

From: Robert Griffin <robert.griffin@manchester.gov.uk>
Sent: 05 December 2024 15:59
To: [REDACTED]
Subject: Re: Highways response to EIASCO/24/006

Hi [REDACTED]

See below response from the applicant re Highways comments on the EIA Scoping Opinion. Can you let me know whether you accpet these findings and the applicants response please.

/

MCC Highways – Comments in relation to EIA Scoping Request EIASCO/24/006 <i>The EIA Scoping Report confirms that the proposed development will be supported by a Transport Assessment.</i> <i>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:</i> <i>• A multi-modal trip generation assessment with further detail on anticipated public transport, pedestrian and cycle distribution/routes/capacities;</i> <i>• 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;</i> <i>• 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;</i> <i>• 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;</i> <i>• 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.</i> <i>• 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;</i>	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
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• 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.

Regards
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

T: [REDACTED]

e: robert.griffin@manchester.gov.uk

From: [REDACTED] <[REDACTED]>
Sent: 28 November 2024 08:05
To: Robert Griffin <robert.griffin@manchester.gov.uk>
Subject: Highways response to EIASCO/24/006

Please see attached document with highways comments on EIASCO/24/006

Regards,
[REDACTED]

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<https://eur03.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.manchester.gov.uk%2Femaildisclaimer&data=05%7C02%7CRobert.griffin%40manchester.gov.uk%7C660a4ed7ccfd41cd3d5208dd0f836e45%7Cb0ce7d5e81cd47fb94f7276c626b7b09%7C0%7C0%7C638683779364806129%7CUnknown%7CTWFpbGZsb3d8eyJFbXB0eU1hcGkiOnRydWUsIlYiOiIwLjAuMDAwMCIsIlAiOiJXaW4zMilskFOljoiTWFpbCIsIldUljoyfQ%3D%3D%7C0%7C%7C%7C&sdata=IS0EiJvDEY%2BxVKE4nBnP8UmhcMN8G3vDQMBPu6UPxt0%3D&reserved=0>.

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<https://eur03.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.manchester.gov.uk%2Fprivacy&data=05%7C02%7CRobert.griffin%40manchester.gov.uk%7C660a4ed7ccfd41cd3d5208dd0f836e45%7Cb0ce7d5e81cd47fb94f7276c626b7b09%7C0%7C0%7C638683779364822338%7CUnknown%7CTWFpbGZsb3d8eyJFbXB0eU1hcGkiOnRydWUsIlYiOiIwLjAuMDAwMCIsIlAiOiJXaW4zMilskFOljoiTWFpbCIsIldUljoyfQ%3D%3D%7C0%7C%7C%7C&sdata=nf%2FCw9loea%2FnPlaEh7mV63dcKI%2BBKX995sfz0c56waA%3D&reserved=0> for further information.

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RE: Highways response to EIASCO/24/006

From [REDACTED]
Date Tue 10/12/2024 11:25
To Robert Griffin <robert.griffin@manchester.gov.uk>

Hi Rob,

Yes, I can confirm that we are satisfied that Construction has been scoped out of the ES.

Many thanks,

[REDACTED]

[REDACTED]
Development Control Engineer
Highways Development Control
Neighbourhoods Directorate

Please Note my Working Hours: Mon - Fri 08:00 - 16:00

Email: [REDACTED]
Phone Number: [REDACTED]
Web: <http://www.manchester.gov.uk>

POSTAL ADDRESS: Manchester City Council, The Highways Service, PO Box 532, Town Hall, Manchester, M60 2LA



Out of Office: PM 12th December, 13th December

Annual Leave: 23rd December – 5th January

From: Robert Griffin <robert.griffin@manchester.gov.uk>
Sent: 10 December 2024 11:18
To: [REDACTED]
Subject: Re: Highways response to EIASCO/24/006

Thanks [REDACTED]

Can you just confirm that you are now happy that the construction phase would not need scoping into the ES based upon this further information.

Regards

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

T: 0161 234 4527

e: robert.griffin@manchester.gov.uk

From: [REDACTED]
Sent: 10 December 2024 11:14
To: Robert Griffin <robert.griffin@manchester.gov.uk>
Subject: RE: Highways response to EIASCO/24/006

Hi Rob,

I hope you are well. Thank you for your email and providing that additional information. Please see Highways response below.

FURTHER COMMENTS 10TH DECEMBER 2024:

Further information has been provided in regard to the effects of the construction traffic.

The updated information has forecasted that during the construction phase the site has the potential to attract 123 total trips per day. Of these it is estimated that 8 trips will be HGV.

The Scoping Report states that the effects of construction and operational traffic have been assessed in consideration of the predicted net change in traffic flows by comparing the likely trip generation of construction and operational traffic against future baseline traffic conditions based on the following IEMA Guideline rules:

- Rule 1 - Include highway links where traffic flows will increase by more than 30% (or the number of heavy goods vehicles will increase by more than 30%); and
- Rule 2 - Include any other specifically sensitive areas where traffic flows have increased by 10% or more.

Any road links that meet these criteria indicate the potential for significant 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.

It is further noted that a Construction Management Plan will be provided. Please note Highways initial comments in relation to CMPs.

It is noted that the general comments Highways provided will be addressed within the application submission documents – thank you.

Many thanks,

[REDACTED]

[REDACTED]
Development Control Engineer
Highways Development Control
Neighbourhoods Directorate

Please Note my Working Hours: Mon - Fri 08:00 - 16:00

Email: [REDACTED]
Phone Number: [REDACTED]

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

POSTAL ADDRESS: Manchester City Council, The Highways Service, PO Box 532, Town Hall, Manchester, M60 2LA



Out of Office: PM 12th December, 13th December

Annual Leave: 23rd December – 5th January

From: Robert Griffin <robert.griffin@manchester.gov.uk>
Sent: 05 December 2024 15:59
To: [REDACTED]
Subject: Re: Highways response to EIASCO/24/006

Hi [REDACTED]
See below response from the applicant re Highways comments on the EIA Scoping Opinion. Can you let me know whether you accpet these findings and the applicants response please.

MCC Highways – Comments in relation to EIA Scoping Request EIASCO/24/006 <i>The EIA Scoping Report confirms that the proposed development will be supported by a Transport Assessment.</i> <i>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:</i> <i>• A multi-modal trip generation assessment with further detail on anticipated public transport, pedestrian and cycle distribution/routes/capacities;</i> <i>• 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;</i> <i>• 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;</i> <i>• 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;</i> <i>• 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.</i> <i>• 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;</i>	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
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• 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.

Regards
Rob Griffin
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e: robert.griffin@manchester.gov.uk

From: [REDACTED] <[REDACTED]>
Sent: 28 November 2024 08:05
To: Robert Griffin <robert.griffin@manchester.gov.uk>
Subject: Highways response to EIASCO/24/006

Please see attached document with highways comments on EIASCO/24/006

Regards,
[REDACTED]

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<https://eur03.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.manchester.gov.uk%2Femaildisclaimer&data=05%7C02%7CRobert.griffin%40manchestergov.uk%7C660a4ed7ccfd41cd3d5208dd0f836e45%7Cb0ce7d5e81cd47fb94f7276c626b7b09%7C0%7C0%7C638683779364806129%7CUnknown%7CTWFpbGZsb3d8eyJFbXB0eU1hcGkiOnRydWUsIlYiOiIwLjAuMDAwMCIsIlAiOiJXaW4zMlslkFOljoIjwvZW50cm9kOiJlbnQ%3D%3D%7C0%7C%7C%7C&sdata=IS0EiJvDEY%2BxVKE4nBnP8UmhcMN8G3vDQMBPu6UPxt0%3D&reserved=0>.

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<https://eur03.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.manchester.gov.uk%2Fprivacy&data=05%7C02%7CRobert.griffin%40manchester.gov.uk%7C660a4ed7ccfd41cd3d5208dd0f836e45%7Cb0ce7d5e81cd47fb94f7276c626b7b09%7C0%7C0%7C638683779364822338%7CUnknown%7CTWFpbGZsb3d8eyJFbXB0eU1hcGkiOnRydWUsIlYiOiIwLjAuMDAwMCIsIlAiOiJXaW4zMlslkFOljoIjwvZW50cm9kOiJlbnQ%3D%3D%7C0%7C%7C%7C&sdata=nf%2FCw9loea%2FnPlaEh7mV63dcKI%2BBKX995sfz0c56waA%3D&reserved=0> for further information.

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Date: 29 November 2024
Our ref: 494984
Your ref: EIASCO/24/006



[REDACTED]
BY EMAIL ONLY

Consultations
Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 900

Dear Mr Robert Griffin

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

Location: Land At Ryebank Fields Chorlton Manchester

Thank you for seeking our advice on the scope of the Environmental Statement (ES) in the consultation dated 27 November 2024, received on 27 February 2024.

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
[REDACTED]

Yours sincerely

[REDACTED]
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 180-181 and 185-188) 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 180 and 181). 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 180 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 104. 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 180 and 181 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 217 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

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

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/lagm>

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 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.

CONSULTATION RESPONSE: EIASCO/24/006

From Safeguarding MAN <[REDACTED]>
Date Fri 08/11/2024 08:44
To Robert Griffin <robert.griffin@manchester.gov.uk>

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The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended) (the "EIA" Regulations)
Reference: EIASCO/24/006 Request for Scoping Opinion
Our Ref.: 2024/374

Dear Robert,

Thank you for consulting with the aerodrome safeguarding authority on the EIA SO for proposed development at Ryebank Fields.

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 review the details of the lighting when they are available. Our perspective is to minimise 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 hazardous 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/Airspace/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.

Sincerely,

MAG Group Aerodrome Safeguarding Team
[Stansted Airport](#) | [East Midlands Airport](#) | [Manchester Airport](#)

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

e: [REDACTED]
www.magairports.com



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Land At Ryebank Fields EIASCO/24/006 – Trafford Ref. 115070/ART18/24

From [REDACTED]
Date Wed 11/12/2024 13:52
To Robert Griffin <robert.griffin@manchester.gov.uk>

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Dear Mr Griffin,

**RE: Land At Ryebank Fields – Trafford Ref. 115070/ART18/24
Article 18 consultation from Manchester City Council in respect of EIASCO/24/006. Request for Scoping opinion under Part 4, Regulation 15 of The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended).**

I write with reference to the above consultation, received on 27th November 2024.

These comments are provided following a review of the Environmental Impact Assessment: Scoping Report by Asteer Planning dated November 2024 and subsequent letter from Asteer Planning 'RESPONSE TO CONSULTEE COMMENTS RECEIVED UNDER SCOPING REQUEST EIASCO/24/006' dated 5th December 2024.

The conclusion of these documents is that the following topics will be scoped into the Environmental Statement (ES):

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

We do not wish to raise any objection to the proposed content and scope of the ES provided that it addresses the impacts on Trafford as well as on Manchester. This position is based on the expectation that other pertinent matters would be dealt with robustly within the supporting documents submitted with any Full Planning Application.

We would take this opportunity to state that we would also require that the supporting documents accompanying the main planning application address the impacts on the Trafford side of the boundary as well as those affecting Manchester. In particular, in relation to highway safety and traffic, contamination, impact on heritage assets, impact on the Ryebank Road community garden which is an Asset of Community Value and impacts / demands on infrastructure, although this list is not exhaustive.

Kind Regards

[REDACTED] Projects Officer
Place Directorate
Trafford Council
Trafford Town Hall, Talbot Road, Stretford, M32 0TH

Tel: [REDACTED]
Fax: [REDACTED]

Email: [REDACTED]

Please note that my normal working days are Monday to Thursday.

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