



**MANCHESTER
CITY COUNCIL**

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Dear Ms Hopkins

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

SCOPING REQUEST UNDER PART 4 REGULATION 15(1)

ALL SAINTS LIBRARY ("THE PROPOSED DEVELOPMENT")

SCOPING OPINION OF MANCHESTER CITY COUNCIL PURSUANT TO REGULATION 15

Thank you for your request dated August 2023 for a Scoping Opinion at the above site.

In coming to a formal opinion on the scope of the Environmental Statement ("ES"), Manchester City Council, as Local Planning Authority, has considered the supporting information contained within your '*All Saints Library, Manchester Metropolitan University Environmental Impact Assessment (EIA) Scoping Report*' prepared by yourselves, on behalf of the Applicant Manchester Metropolitan University, and the comments from statutory consultees.

I have now had a chance to consider your scoping request and I outline my response below.

The Proposed Development is considered an EIA development as it falls within the description and thresholds in Schedule 2 10(b) of the EIA Regulations as an 'Infrastructure Project - Urban Development Project' which has the potential to have significant effects on the environment. In accordance with Schedule 2, Categories 10(b) (urban development projects) of the EIA Regulations and owing to the location, scale and nature and of the Proposed Development, I note that you recognise the need for an EIA and have therefore submitted the Scoping Report for consideration to the City Council, as Local Planning Authority.

Before adopting a Scoping Opinion the City Council, as Local Planning Authority, must take into account the information specified in Regulation 15(6) of the EIA Regulations.

- (a) any information provided by the applicant about the proposed development;
- (b) the specific characteristics of the particular development;
- (c) the specific characteristics of development of the type concerned; and
- (d) the environmental features likely to be significantly affected by the development.

This Scoping Opinion sets out the information that the City Council, as Local Planning Authority, considers should be included in the ES that will be submitted with the subsequent planning application made in respect of the Proposed Development.

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

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

Your report of August 2023 sets out the proposed chapters that the ES will cover, and the disciplines which you believe should be scoped in and out of the EIA.

These are as follows:

Scoped in

- Climate Change
- Townscape and Visual Impact
- Wind and Microclimate

Scoped out

- Arboriculture
- Construction Traffic and Transport
- Acoustics
- Ground Conditions
- Flood Risk and Drainage
- Traffic and Transport
- Noise and Vibration
- Sunlight, Daylight and Overshadowing
- Solar Glare
- Ecology
- Heritage

CONTEXT

The development site is approximately 0.7 hectares and comprises the All Saints Library Building located on the western side of Oxford Road and to the south of the Mancunian Way.

The site forms part of Manchester Metropolitan University's wider campus and lies within the area allocated as the Oxford Road Corridor.

The university campus and wider area has seen extensive redevelopment in recent years, with various new educational buildings having been approved and subsequently built along Chester Street (The John Dalton West building), Cambridge Street (Faculty of Business and Law building and Manchester Law School building) and Oxford Road itself (Manchester Poetry Library and Manchester Institute of Sport).

SENSITIVE RECEPTORS

The development site is located within the Greater Manchester Combined Air Quality Management Area (AQMA) and as such the development is likely to impact on the AQMA both during construction and when the development becomes operational.

The site is not within, nor does it contain, any ecological designations including sites of specific interest (SSSI), sites of biological importance (SB1) or special protection areas (SPA). Notwithstanding this however, the site does lie adjacent to All Saints Park, a public green space with a notable number of mature trees, as well as 5no street trees to the east along Oxford Road.

The site is in Flood Zone 1 and within the Manchester, Salford and Trafford Critical Drainage Area (CDA).

The development is located adjacent to south of the A57 "Mancunian Way", an elevated five lane highway.

The development site is not located in a Conservation Areas and does not contain any listed buildings. There are a number of listed buildings within 500 metres of the development site which are as follows:

1. Former Manchester Ear Hospital to south of side facing onto All Saints Park – Grade II
2. St Augustine's Church to south of side facing onto All Saints Park – Grade II
3. Brighton Building to south of side facing onto All Saints Park – Grade II
4. Grosvenor Building to south of side facing onto All Saints Park – Grade II
5. Town Hall Façade to south of side facing onto All Saints Park – Grade II
6. Former Grosvenor Picture Palace to south of side facing onto All Saints Park – Grade II
7. Adult Deaf and Dumb Institute to south of side facing onto All Saints Park – Grade II
8. Waterloo Place to south of site facing onto Oxford Road – Grade II
9. Oddfellows Hall to east of application site along Grosvenor Street – Grade II
10. 94-98 Grosvenor Street to east of application site along Grosvenor – Grade II

Numerous listed buildings then lie to the north of the application site past the Mancunian Way, these are as follows:

11. Dalton Statue – Grade II
12. Dancehouse Theatre – Grade II
13. Chatam Mill – Grade II

14. Mill on north east corner of junction with Chester Street – Grade II
15. Chorlton Old Mill – Grade II
16. Mill Chimney Stack – Grade II
17. Former Cotton Mill on Cambridge Street – Grade II
18. Chorlton New Mill – Grade II
19. Manchester Oxford Road – Grade II
20. The Ritz Dance Hall – Grade II
21. Rochdale Canal Lock Number 89 – Grade II
22. St James Buildings – Grade II
23. Total, Broadhurst and Lee – Grade II
24. Lee House – Grade II
25. Rochdale Canal Lock Number 88 – Grade II
26. The Palace Theatre – Grade II
27. Bridgewater House – Grade II
28. Central House – Grade II
29. Former Refuge Assurance Company Offices – Grade II*
30. India House – Grade II*
31. Lancaster House – Grade II*
32. Asia House – Grade II*
33. Manchester House – Grade II
34. Lass O Gowrie Public House – Grade II
35. Granby House – Grade II
36. Orient House – Grade II

PROPOSED DEVELOPMENT

I note from your Scoping Report that the Proposed Development is based on a number of parameters which are evolving as part of the design process. Should these parameters change, then a further scoping assessment should be undertaken if the scope of the ES needs to reflect this.

The Proposed Development would consist of the partial demolition and associated redevelopment/partial refurbishment of Manchester Metropolitan University's All Saints Library. This would include a new build element of up to 22,000sq. ft., with twelve floors of library space. The project is designed to provide a purpose-built library and work space for university students, with associated landscaping, cycle parking and associated works also proposed.

No car parking is proposed as part of the development.

The pedestrian routes to the development would be along Oxford Road from the north and south, as well as through All Saints Park, Lyceum Place and Lower Ormond Street.

ASSESSMENT OF THE SCOPING REPORT

I can confirm that the approach outlined within the Scoping Report is considered to be generally acceptable, appropriate and proportionate. This is also reflected in the nature of the consultation responses.

You should note the specific points I have made below within the specific discipline areas which reflect the comments of the consultees and those of the City Council, as Local Planning Authority. These matters should also be included and addressed within the relevant chapters of ES.

Discussion of alternatives

Paragraph (3)(d) of Regulation 18, and paragraph 2 of Schedule 4 of the EIA Regulations, require that environmental statements include discussion description of the reasonable alternatives to the

Proposed Development and an indication of the main reasons for the option chosen, that have been considered by the applicant.

I note within section 3 of your Scoping Request that you intend to provide a discussion on alternatives within the ES. This will focus on alternatives considered and project design evolution.

Presentation and content of the Environmental Statement

The purpose of an ES is to enable significant environmental impacts of a proposed development to be fully considered before an application for planning consent is determined.

The ES provides environmental information to aid the decision making process. The ES should be laid out clearly, with minimum use of technical terms (where appropriate) and should provide an objective and realistic description of the likely significant impacts of the proposed development.

The information should be presented so as to be comprehensible to the specialist and non-specialist alike. The ES should be concise with supporting technical information placed in appendices.

Mitigation

Paragraph 7 of Schedule 4 of the EIA Regulations states that mitigation measures may fall into a range of categories namely:

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

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

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

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

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

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

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

Cumulative effects

The committed developments summarised in Appendix B appears to be acceptable.

Cross references and summarising of the findings

All specialist chapters should be cross-referenced to other relevant disciplines (for example traffic impacts on air quality). Consideration of the potential for interactions between the different aspects of the environment is essential to the production of a robust assessment.

The ES should not be a collection of separate specialist chapters, but a comprehensive assessment of the environmental impacts of the proposed components of the wider scheme, and should account for how the identified impacts could be mitigated or avoided, or how suitable compensation could be provided to offset those effects.

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

ENVIRONMENTAL MATTERS TO BE SCOPED OUT OF THE ES

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

Arboriculture

The Scoping Report states that the site is mostly comprised of hard standing and that the 5no trees within the site along Oxford Road are of limited ecological importance. I agree with this assessment and it can therefore be scoped out of the EIA.

Construction Traffic and Transport

The Scoping Report acknowledges that the local highway network would experience some disruption as part of the construction works. Notwithstanding this however, a detailed Construction Logistics Plan (CLP) would be prepared and implemented prior to the commencement of the works (secured by planning condition), which will provide a framework for a range of measures to help mitigate the temporary environmental impact of construction activities on the surrounding community. Subject to such an arrangement this can be scoped out of the EIA.

Acoustics

The site lies adjacent to the Mancunian Way and Oxford Road, areas that the Scoping Report notes are subject to elevated noise levels associated with vehicular movements and other city centre uses. The report goes on to state that noise controlling methods would be adopted and could be implemented as part of a Construction Environmental Management Plan and as such can be scoped out of the EIA.

Ground Conditions

The Scoping Report notes that a detailed Phase 1 Ground Conditions Assessment will be submitted in support of the application. Subject to the implementation of appropriate mitigation, ground conditions can be scoped out of the EIA.

Flood Risk and Drainage

As previously noted, the development lies within Flood Zone 1. Within the Scoping Report it details that the application will be accompanied by a surface water and foul water drainage strategy. The submitted construction environmental management plan would then contain information on how measures would be put in place to prevent the contamination of local water sources. On this basis it is considered that there is unlikely to be any significant adverse effects in this regard and it can therefore be scoped out of the EIA.

Traffic and Transport

It is acknowledged that the development site does not benefit from car parking facilities and that none are proposed. In mind of this, as well as the site's highly accessible location, this can be scoped out of the EIA.

Noise and Vibration

The Scoping Report states that the development is not expected to generate significant numbers of additional road traffic movements, therefore no greater than negligible operational traffic noise impacts are anticipated. Additionally, any relocated or new plant would be suitable attenuation measures to avoid adverse impacts on local amenity. On this basis noise and vibration can be scoped out of the EIA.

Sunlight, Daylight and Overshadowing

The development, at a maximum height of twelve stories has the potential to overshadow neighboring development. Notwithstanding this, the Scoping Report makes clear that an application will be accompanied by an Overshadowing Analysis and full Daylight, Sunlight and Overshadowing Report. With appropriate investigation it is agreed that this may be scoped out of the EIA.

Solar Glare

It is noted that the development is to primarily consist of pre-cast concrete and as such would have minimal solar glare. The Scoping Report states that a qualitative desktop assessment is proposed. Provided such an assessment accompanies the application solar glare can be scoped out of the EIA.

Ecology

As previously stated within this report, it is noted that despite the application site being situated adjacent to a high number of mature trees, the neighboring area is of limited ecological value. It is agreed that subject to the submission of an Ecological Impact Assessment, bat survey and biodiversity net gain calculation, that ecology may be scoped out of the EIA.

Heritage

The Scoping Report does not provide reasoning for why heritage would be scoped out of the EIA. It is noted that the site lies within close proximity of Grade II buildings that face onto All Saints Park. Notwithstanding this however, it is appreciated that the townscape and visual impact assessment would include two viewpoints within the setting of the aforementioned listed buildings. Subject to the inclusion of a heritage assessment within viewpoints 1 and 2, it is agreed that heritage can be scoped out of the EIA.

ENVIRONMENTAL STATEMENT CHAPTERS - SPECIFIC COMMENTS ON THE TECHNICAL CONTENTS

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

Your Scoping Report advises that the ES will cover the following topic areas.

- Climate Change
- Townscape and Visual Impact

- Wind and Microclimate

General Comments

For planning purposes, the development site is located in the Regional Centre together with the Eastlands Strategic Employment Location.

The significance of the site should be reflected throughout the ES. The Environmental Chapters must therefore consider the impacts of the Proposed Development on this context in order to determine any wider significant environmental impacts.

Climate Change

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

Townscape and Visual Impact

The comments within your Scoping Report are noted and are acceptable in terms of their consideration in the ES. Further to the comments listed above, it is recommended that assessment of viewpoints 1 and 2 include information regarding the proposed development's impact on neighbouring heritage assets.

Wind and Microclimate

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

FURTHER INFORMATION

The City Council, as Local Planning Authority, has undertaken a thorough consideration of the information contained within your Scoping Report together with providing comments from relevant statutory consultees. The issuing of this Scoping Opinion does not preclude the City Council, as Local Planning Authority, from requesting further information at a later stage as the development proposals evolve or whilst a future planning application is being formally considered.

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

Yours sincerely



Dave Roscoe

Deputy Director of Planning