

Appendix 2.2

EIA Scoping Opinion Response



**MANCHESTER
CITY COUNCIL**

Julie Roscoe

Director of Planning, Building
Control and Licensing

PO Box 532
Town Hall
Manchester M60 2LA

Charles Louis Anderton
Avison Young
11 York Street
Manchester
M2 2AW

Contact: Miss Jennifer Atkinson
Tel: 0161 234 4517
Fax: 0161 274 0014
Email: jennifer.atkinson@manchester.gov.uk

16 March 2023

Our reference: JA/DMN

Dear Mr Anderton

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

SCOPING REQUEST UNDER PART 4 REGULATION 15(1)

**‘RED BANK NEIGHBOURHOOD’ MANCHESTER (“THE PROPOSED
DEVELOPMENT”)**

**SCOPING OPINION OF MANCHESTER CITY COUNCIL PURSUANT TO
REGULATION 15**

Thank you for your request dated 31 January 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 ‘*Red Bank Neighbourhood - Environmental Impact Assessment Scoping Report*’ prepared by yourselves, on behalf of the Applicant FEC, 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 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 the 31 January 2023 sets out the proposed chapters that the ES will cover, and the disciplines which you believe should be scoped into the EIA.

These are as follows:

Scoped In

- Townscape and Visual;
- Ecology and Nature Conservation;
- Archaeology and Heritage;
- Ground Conditions;
- Flood Risk and Drainage;
- Transport and Access;
- Air Quality and Dust;
- Noise and Vibration;
- Sunlight, Daylight and Overshadowing;
- Wind Microclimate;
- Socio-economic;
- Health;
- Climate Change.

Below is a consideration of the Scoping Report for the Proposed Development and comments on the approach which you have outlined.

CONSULTATIONS

Regulation 15 (4) of the EIA Regulations require the City Council, as Local Planning Authority, to consult consultation bodies prior to adopting a Scoping Opinion.

Having regard to Regulation 2 of the EIA Regulations, the following consultees were consulted who have specific environmental responsibilities and which the City Council,

as Local Planning Authority, considers are likely to have an interest in the development proposal.

- Natural England;
- Environment Agency;
- Greater Manchester Ecology Unit (GMEU);
- Greater Manchester Archaeology Advisory Service (GMAAS);
- Transport for Greater Manchester (TfGM);
- United Utilities;
- City Council Highway Services;
- City Council Environmental Health;
- City Council Flood Risk Management;
- City Council works and skills;
- Aerodrome Safeguarding;
- Design for Security at Greater Manchester Police.

All responses of the consultees contacted by the City Council, as Local Planning Authority, during the EIA scoping process are appended to this letter.

You are strongly recommended to consult further with consultees as appropriate throughout the EIA process as the development proposal evolves. It is thereby recommended all consultee responses are reviewed by you and the applicant in full.

Any subsequent ES submitted with a planning application should reflect the points raised by the consultation bodies where this reflects the requirements of the Regulations. It is recommended that the ES summarises the scoping responses from the consultation bodies and how they are, or are not, addressed in this regard. Any consultation responses received after the date of this letter, that have not been taken into account within this Scoping Opinion, will be forwarded to you and should be given due consideration in the planning application and EIA process.

CONTEXT

The development site is approximately 15.67 hectares to the south of Red Bank within the Northern Gateway Strategic Regeneration Area.

The site is bound by existing commercial and industrial uses to the north, hardstanding car park, existing commercial units to the west, residential development along Dalton Street and Collyhurst Road to the east, and existing commercial units to the northeast including the HMG Paint complex, and the railway line into Victoria Station to the south, southwest and southeast.

Historically the area was used as railway sidings and other industrial uses, following the route of the former Prestwich Branch of the Lancashire and Yorkshire Railway which started at Victoria Station to the southwest before heading northwest. This is now largely disused with some commercial/industrial uses present with much of the

site forming a plateau above the River Irk valley to the south-east. Immediately south of the River Irk there is existing commercial use and an area of hardstanding.

Manchester Victoria Station is the nearest train station and is located approximately 420m southwest of the site. The station predominantly provides local and regional mainline services to the north of England.

SENSITIVE RECEPTORS

The development site is not located within the Greater Manchester Combined Air Quality Management Area (AQMA). The AQMA is 150 metres from the development along Cheetham Hill Road.

The site is not within, nor does it contain, any ecological designations including sites of specific interest (SSSI), sites of biological importance (SBI) or special protection areas (SPA). There is one internationally designated site for nature conservation within 10 km of the development site – Rochdale Canal Special Area of Conservation (SAC) IS 4.4 km north east of the development site. There are no statutory designated sites within 2 km of the development site and there are four non statutory local designated sites within 2 km the closest of which is Rochdale Canal Stotts Lane - Ducie Street Basin SBI.

The site is located in Flood Zones 1, 2 and 3. The site is also situated within the Manchester, Salford and Trafford Critical Drainage Area (CDA).

The development site is not located within a Conservation Area and the site does not contain any listed buildings. There are 35 Grade II listed buildings and 1 Grade II* listed building within 500m of the site, the closest of which is the Grade II Listed Union Bridge, located on the south eastern boundary of the site.

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 comprise three Development Areas, which are divided into a number of development plots:

- **Red Bank Plateau** – This area includes the development plots north of Dantzic Street and includes development plots RB01, RB02, RB03, RB04, RB05A, RB05B, RB05C and RB12B;
- **Red Bank Viaduct** – This area includes the development plots surrounding the Red Bank Viaduct, west of Dantzic Street and includes Development Plots RB06, RB07 and RB10; and
- **New Town** – This area includes the Development Plots south of Dantzic Street and includes development plots RB16, RB17, NT02, NT03 and NT04.

Building heights would vary across the proposed development. Maximum heights within the Red Bank Plateau area would vary between up to 73m AOD (up to 8 storeys) and up to 123m AOD (up to 24 storeys). Maximum building heights in the Red Bank Viaduct area who vary

between up to 124m AOD (up to 27 storeys) and up to 211m AOD (up to 55 storeys). Building heights within the New Town area would vary between 98m AOD (up to 19 storeys) and 155m AOD (up to 37 storeys). The principles of the building heights within the Proposed Development would be to:

- Create consistent shoulder heights along key routes;
- Stagger taller elements to avoid facing towers;
- Identify appropriate locations for the landmark towers at the Red Bank Viaduct and New Town to positively respond to the expanding city centre, Dantzic Street and the railway viaduct; and
- Create a dynamic skyline through variation in heights.

There would be a limited vehicular network at the development with active travel being promoted at the site through a series of green routes. Servicing and emergency vehicular access will be provided to all blocks. Vehicular movement through the site would be primarily restricted to Roger Street, Dantzic Street and a new "Plateau Avenue" with provision for emergency vehicle access and servicing only along other internal routes.

Hard and soft landscaping and new public realm would be created including focal squares and formal and informal play spaces. Sustainable drainage would form part of the development design.

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 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 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.

- Townscape and visual impact;
- Ecology and Nature Conservation;
- Archaeology and Heritage;
- Ground Conditions;
- Flood Risk and Drainage;
- Transport and Access;
- Air Quality and Dust;
- Noise and Vibration;
- Sunlight, Daylight and Overshadowing;
- Wind Microclimate;
- Socio-economic;
- Health;
- Climate Change.

General Comments

For planning purposes, the development site is located in a Strategic Housing Location (policy H2) of the Manchester Core Strategy (2012) together with forming a key component of the Northern Gateway Strategic Regeneration Framework Areas.

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.

The Environment Agency have expressed some concern with regards to the approach of the ES.

The state that Table 4.1 of the scoping report lists the assessment scenarios which will be presented in the future ES. In addition to 'typical assessment' offering determination on the individual effects of each development proposal. They welcome your further intention to initially assess the combined effects of the developments to be proposed under 'Application 4' and 'Application 5'; in conjunction with the Northern Gateway Strategic Regeneration Framework (SRF). However, in connection with, they would highlight for the purpose of the ES, that within the relevant 'Approach and Methodology' sections of the scoping report, for the topics been determined to be 'scoped-in', that presently clear individual assessment approaches have not been established for the 'Application 4' and 'Application 5' development proposals.

Whilst they recognise that the intention is to prepare one ES covering both applications, they advise it is ensured that clear separate assessment approaches are detailed within the forthcoming ES to ensure the potential significant effects of each

application individually are fully considered and presented for planning application assessment / determination.

In the instance that clear distinction / individual assessment is not achieved, they advise this would likely create a challenge for assessing and determining the suitability of granting planning permission for each of the forthcoming planning applications. Beyond EIA determination, they note that each planning application submitted will need to be assessed by the Local Planning Authority (with EA input) against its individual merits and, in turn, its sustainability not dependent upon any mitigations / measures intended to be delivered as part of a separate application (unless completed/built at point of planning submission) due to the fact that no guarantee / certainty exists that such wider development / intervention will be delivered.

Townscape and visual impact

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

Ecology and Nature Conservation

The comments within your Scoping Report are noted and are broadly acceptable in terms of their consideration in the ES. The following additional comments should be considered as part of the ES.

The Scoping Report states - *“in order to achieve 10% biodiversity net gain, it is anticipated that off-Site compensation would be agreed upon to make up for the biodiversity unit deficit. This exact nature and location of the mitigation will be determined through subsequent dialogue with MCC and other relevant stakeholders”*

It is hoped that but the time the planning application is made dialogue would have progressed concerning off-site compensation areas and options.

If specific details about the potential for off-site biodiversity enhancements available to achieve a 10% net gain in biodiversity is not then consideration would need to be considered in terms of to approach this aspect of the development.

The development represents an excellent opportunity to introduce high quality Green Infrastructure and Public Realm improvements to the area. A Green Infrastructure Strategy is prepared as part of any future planning application.

Invasive plant species, particularly Himalayan Balsam, Giant Hogweed and Japanese Knotweed, are endemic in this area, and particularly along the river course. A method statement should be prepared giving details of the measures to be taken to at control the spread of these plants, and at most to attempt eradication, in the area. The control of these invasive plants would be a significant environmental benefit for the area.

Archaeology and Heritage

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

Whilst Greater Manchester Archaeology Advisory Service (GMAAS) have considered that archaeology can be scoped out, for completeness and in the interest of a robust ES, I consider they should remain scoped into the ES.

GMAAS anticipate that the HEDBA will be updated in the light of any additional information deriving from the progress of the Infrastructure scheme and submitted in support of a future planning application for the Red Bank Neighbourhood. The Scoping Report suggests that pre-determination evaluation of the archaeological assets is required, and whilst this would represent best practice in line with the NPPF and local planning policy, GMAAS will be content to secure archaeological interests as a condition attached to a future consent, not least as some of the sites of archaeological interest in the application area are not currently accessible for intrusive investigation.

The above advice relates to the below-ground archaeological interest. In terms of the built heritage, the Scoping Report proposes that detailed consideration should only be afforded to designated heritage assets that lie within the site boundary. Through the townscape and visual impact chapter of the ES, there needs to be due consideration to the impact on the city scape and on assets outside of the development boundary.

There are a couple of minor points on the Scoping Report that ought to be noted. In particular that there is a crucial distinction between the 'Post-medieval Period' (1530s – mid-18th century) and the 'Industrial Period' (mid-18th-century – c. 1914), and erroneously refer to several sites of 19th-century origin as 'post-medieval'. In doing so, the Resource Assessment and the Research Objectives for the Industrial Period set out in the current North West Historic Environment Research Framework have been overlooked(<https://researchframeworks.org/nwrf/industrial/>). This should be addressed.

Ground Conditions

The comments within your Scoping Report are noted and acceptable in terms of their consideration in the ES. In particular that the construction phase is scoped in based on potential residual contamination and the operational phase will be scoped out of the ES and will be dealt with under condition stage

The Environment Agency (EA) have highlighted that a large proportion of the development area identified for 'Application 4' is the intended subject to enabling works planned for delivery as part of MCC's HIF works package detailed under 'Application 2'; this includes the remediation of areas whereby adverse contamination has been identified and the creation of development platforms / plots, facilitating future built-form development (intended to be delivered as part of 'Application 4' development. They note and acknowledge that 'Application 2' does not intend to address contamination issues that may arise from the 'Application 5' development area and within development plots 'RB16' and 'RB17' (south bank of the River Irk) specified under 'Application 4'.

They note for paragraph 9.8 of the scoping report that it is the intention to produce a Preliminary Risk Assessment for development proposed under 'Application 4' within which 'expected baseline conditions' would be described. Echoing of previous statement regarding not placing reliance upon any development / application not yet delivered / realised and in line with relevant [Land Contamination Risk Management \(LCRM\) Guidance](#), they advise that, at the point of the planning submission, any risk assessment reporting submitted will need to offer assessment of existing ground conditions, not those anticipated to potentially be created as a result of any separate enabling works / planning permission for the development area.

Further the above and cognisant to the JV established, they advise that additional baseline ground investigation reporting exists for the north bank area of 'Application 4' which has been undertaken by the HIF project team as part of proceedings for

'Application 2'; this further ground investigation reporting identifies the presence of additional forms of contamination (e.g. PFAS) not identified with the prior 2019 and 2021 reporting produced by Arup Ltd. Given the overlap in development areas between the various applications, they that copies of the latest ground investigation reporting (and any subsequent) produced by the HIF project team are obtained as they consider this would form appropriate baseline reporting (in addition to any further reporting produced for the 'Application 5' development area) for the forthcoming ES chapter regarding ground conditions.

Further to the above, they would highlight the assessment approach in this chapter includes limited details on remedial works which fall outside the scope of the 'Application 2' development area. Whilst this is not an issue for the purpose of the scoping report and forthcoming ES chapter, wider to any relevant reporting produced by the HIF project team, they advise that early action is taken to ensure that all necessary information / data required to assess comprehensively ground conditions and determine subsequent remedial requirements is achieved / obtained. Undertaking such action early will prevent the creation of delays and complications at later stage in proceedings.

The EA welcome the opportunity to discuss further with the ground investigation / remedial requirements and in association with this note ongoing work relating to 'Application 5'.

They welcome the recognition made within the scoping report that additional investigative works and minor remedial actions may be required post 'Application 2' works to ensure the site is suitable for its intended use and does not cause an unacceptable risk to sensitive receptors (see paragraphs 9.21 and 9.22 of the scoping report for reference).

Due to the former historic industrial land use(s), soil and/or groundwater contamination that currently exists within the development area in question, they would provide a list of relevant documents for review (please see their letter for further details).

Flood Risk and Drainage

The comments within your Scoping Report are noted and acceptable in terms of their consideration in the ES. The following additional comments are made in connection with this chapter of the ES.

The intention to complete an updated flood modelling exercises enabling the determination of baseline conditions and the subsequent effective assessment of potential future flood risk.

Guidance on the content of a site-specific FRA can be found here:
<https://www.gov.uk/guidance/flood-risk-assessment-for-planning-applications>.

The EA have requested individual assessment approaches for 'Application 4' and 'Application 5' are detailed within the final ES prepared.

The EA note that reference is to be made to the assessment of the 'peak flood level' as an example to determine the magnitude of impact of the development on flood risk. The EA recognise a separate 'Climate Change' chapter has been 'scoped-in' to the ES to take into account the impacts of development on extreme weather events (i.e. extreme rainfall), they also advise that the design flood level takes the impacts of climate change into account (1% AEP plus appropriate climate change allowance), is

also considered in the 'Flood Risk and Drainage' chapter to determine the effects on flood risk and suitable flood risk mitigation measures to be embedded within the development proposals.

Further guidance on the latest climate change allowances for both peak rainfall and peak river flow can be found here:

[Flood risk assessments: climate change allowances - GOV.UK \(www.gov.uk\)](https://www.gov.uk).

It is noted that the design event flood levels will be established from the flood modelling exercise intended to be undertaken to support the forthcoming planning applications. In addition, we recommend that a range of return periods are included and considered within the assessment of flood risk. Of note, the FRA undertaken for the individual development proposals should demonstrate how residual flood risk (i.e. the 0.1% AEP event) is anticipated managed to ensure appropriate mitigation / emergency planning is in place in line with the 'Flood Risk and Coastal Change' section of the Planning Practice Guidance.

The forthcoming planning applications should, as a minimum, include indicative plans / details of schemes to:

- Dispose of foul drainage
- Dispose of surface water
- Install oil and petrol separators where necessary
- Install trapped gullies where necessary
- Include roof drainage – sealed at ground level
- Treat and remove suspended solids from surface water run-off during construction works (usually presented with a Construction Environmental Management Plan).

Design considerations for the above schemes should not only be isolated to dealing with the management of flood risk but also demonstrate how proposals contribute to enhancing the wider environment, such as, considerations of WFD objectives (as outlined above) and implementation of ecological enhancement where possible.

The EA advise that the River Basin Management Plans (RBMPs) which outline the objectives of achieving the objectives of the WFD have recently been updated (December 2022), the latest iterations of WFD reporting should be considered within forthcoming assessments. For further details on this topic matter see: [River Basin Management Plans: Updated 2022](#)).

Further to the above, we welcome the intention to complete a WFD Screening and Scoping study to support the forthcoming planning applications. We will continue to engage with the applicant / developer to determine further detailed WFD Assessment requirements for each of the applications. In virtue of the outline nature of Application 4, the EA anticipate that detailed WFD assessment will form part of wider, phased, precommencement conditional requirements specified on any subsequent planning permission granted.

Echoing the earlier contents of this response letter, we advise the assessment approach and impacts for 'Application 4' and 'Application 5' are detailed individually within the forthcoming ES to ensure various different development factors (e.g. surface water outfall) are appropriately accounted for and assessed.

The EA require that water quality as well as ecology is actively considered within the scheme given the interaction of the proposed development with the River Irk within the

Red Bank Neighbourhood. Under the WFD, the Irk (Wince to Irwell) in this location is a Heavily Modified waterbody (WFD ID: GB112069061131) and is classified as having a 'moderate' overall WFD status (ecological: moderate / chemical: fail). This overall classification is accounted to being the result of the historical physical modifications made to the waterbody and the impacts of both point-source and diffuse pollution.

New development proposals should aim to offer contribution / improve the status of WFD waterbodies (contributing to the attainment of 'Good Ecological Potential / Status'). In accordance with Regulation 33 of [The Water Environment \(Water Framework Directive\) \(England and Wales\) Regulations 2017](#), it should be ensured that new development proposals do not cause detriment to WFD classifications and do not act to prevent the attainment of 'good' status in any category.

As part of any WFD assessment undertaken, we advise acknowledgement is made as to how proposed developments complies with the [Water Framework Regulations 2017](#) and, in this instance, the associated [North West River Basin Management Plan \(RBMP\)](#).

Under 'Application 2', the EA recognise the intention to include interventions to enhance the River Irk, such as, the removal of walls along the watercourse and landscaping to enhance the riparian corridor. We advise that any proposals or interventions along the riparian corridor within 'Application 4' seeks, where possible, to integrate effectively with any known final interventions planned as part of 'Application 2' to maximise the opportunities for enhancement of the River Irk corridor in this area. The retention of a continuous unobstructed watercourse corridor is an essential requirement for the preservation of wildlife habitat, flood flow conveyance and future watercourse maintenance / improvements.

We note paragraph 10.28 of the scoping report states that the EA are currently developing flood risk management schemes within the area and therefore, 'the future of flood risk' is not known and so will need to address further within future reporting. To offer clarification on this matter, the EA, working in partnership with key stakeholders, is involved in the 'Bringing the River Irk to Life' (BRIL) Project whereby the focus is to restore and enhance the River Irk in line with overarching WFD objectives. For details on BRIL see: <https://naturalcourse.co.uk/projects/irk-vision-bringing-the-river-irk-to-life/bril-c15-2/>.

Opportunities should be identified under the BRIL project and that these are recognised and accounted for within any design proposals for the riparian corridor made within Application 4 and 5. Although it is acknowledged that the Red Bank Neighbourhood planning boundary only covers a limited section of the River Irk, we advise that any riparian corridor proposals / designs / interventions are supportive to the aims WFD and BRIL - seeking to enhance the formal status and quality of the River Irk.

Given the proposals' proximity to sensitive surface and groundwater receptors (the River Irk and underlying aquifers), careful consideration will need to be given as to how any surface or groundwater arising from construction from the development will be managed. Any new surface water flows generated during construction or during the development's operational phase should be attenuated and treated, where appropriate / necessary, using SUDs solutions (i.e. attenuation ponds, swales etc.) prior to discharging into the River Irk.

Consideration will also need to be given as to how any surface water (further to the matter of discharge rates) arising from the completed development will be appropriately

disposed of. Therefore, we advise adopting a multifunctional surface water drainage strategy, based on SuDS management principles outlined in CIRIA C753 guidance which includes good practice development examples already adopted in UK. This is to ensure water and ecological quality does not deteriorate and is potentially enhanced as part of scheme proposals.

Further guidance and information on this topic matter can be found here: [SuDS Manual C753 Chapter List \(ciria.org\)](#).

I have not yet received comments from the Lead Local Flood Authority. These will follow in due course.

Transport and Access

The comments within your Scoping Report are noted and are acceptable in terms of their consideration in the ES together with the details outlined below:

Strategic Models should not be used in the determination of base flows.

Traffic modelling should be undertaken using demand flows to ensure that results are realistic and representative of existing conditions. For congested junctions, demand flows can be derived using traffic count and queue survey data.

A trip generation and distribution exercise should be provided to the Local Highway Authority (LHA) and TfGM at the earliest possible convenience to inform the scope of the assessment work.

The TA should review the impact of displacement car parking within and around the site, should the development be reliant upon the use of existing car parks. This should encompass the level of potential displacement of existing trips to surrounding car parks, and / or the impact of new development trips if the existing car parks are full.

General Comments

I. A description of current baseline traffic conditions in the area.

II. An analysis of injury accidents during a recent five-year period, commenting on whether there are any underlying patterns of injury accidents that might be affected by the development.

III. Traffic surveys and queue surveys (weekdays) - scope to be agreed with the Local Highway Authority (LHA), TfGM UTC and HFAS. TfGM UTC can be contacted in respect of the availability of any traffic counts in the area that could be used for the assessment.

IV. A clear estimate of the level of new traffic likely to be associated with the development, based on an inspection of similar (and similarly-located) developments across the UK (excluding London) via the TRICS (or similar) database. The assessment work should be undertaken using a person-trip approach and applying the appropriate modal share percentages from local Census data. Other methodologies to determine trip rates are acceptable but these should be fully explained in the TA.

V. A clearly defined methodology for determining the distribution / assignment of development trips onto the network i.e. understanding of where such new traffic is

likely to distribute to/from, based on data sources such as a Census Journey-to-Work statistics and/or vehicle turning proportions at nearby junctions.

VI. An assessment of traffic levels and impacts at the specified year of opening of the development, and at a future year at least five years later, with due regard for traffic growth (if any).

VII. An understanding of the likely impacts of the proposed development considered alongside any other nearby committed developments.

VIII. In the relevant TA, clear diagrams should be provided illustrating the following elements, each individually:

- Base Flows
- Committed Development Flows
- Proposed Flows
- Proposed Distribution
- Base plus Committed plus proposed development
- Future plus Committed plus proposed development

IX. TfGM HFAS recommends an increase of about 30vehs/hr at a junction as an appropriate threshold for considering the necessity of a traffic impact assessment; this is in preference to a percentage-increase threshold, which tends to favour development in already heavily-trafficked areas.

X. The scope of the junctions to be assessed by detailed modelling should be agreed with TfGM (UTC) and the LHA in advance and will depend upon the outcome of the trip assessment and distribution exercise. For this reason, TfGM would advise that a trip generation and distribution exercise should be issued before submission of the planning application. Once this is undertaken it will be possible to finalise TfGM requirements in terms of the TA. This will largely depend on the amount of trip generation.

XI. Clear details of proposed vehicular access arrangements including general servicing arrangements. An engineering drawing should be supplied showing the changes to the road network to fully understand the impact of the proposed development.

XII. A swept path analysis should be provided for any vehicular access.

XIII. A review of Traffic Regulation Orders on the surrounding streets in the vicinity of the development.

XIV. An assessment of the likely environmental/traffic impacts of HGVs during the construction process.

Site Accessibility by Sustainable Modes

Walking and cycling should form the natural mode choice for shorter trips, and also provide a viable option to facilitate longer trips through providing easy access to public transport. New developments should connect with, and enhance, existing walking and cycling networks in their vicinity, and also provide high quality facilities and networks for walking and cycling within development sites.

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

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

The catchment area for cycling, walking and public transport should be captured in maps. The quality of the routes for pedestrians and cyclists should be described and this should include a description of any signing for cycle routes as appropriate.

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

The TA should include a plan clearly showing details of the proposed pedestrian and cycle access points serving the site and linkages into the surrounding area. Connectivity with local public transport networks should be highlighted. The applicant should consider measures to encourage access by sustainable modes.

Possible measures include but are not limited to the provision of pedestrian crossings, cycleways, cycle parking, new/improved footway ensuring that there are linkages into existing cycle and pedestrian facilities, as well as upgrades to existing bus stops (where appropriate). TfGM would suggest that a pedestrian survey is carried out in the vicinity of the site, as per guidance <https://www.livingstreets.org.uk/media/1434/street-reviewguidance-for-web.pdf> and included as part of the TA.

It should be highlighted that LTN/120 has been introduced by the DfT and this has changed the requirements for the design of cycling provision. Details of cycle parking facilities for the proposed development (e.g., number of spaces, location and type) should be provided and shown on plan.

Mitigation Measures

Impacts of the development should be identified through the above assessment work. The applicant 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 the LHA 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.

Travel Plan

A Framework Travel Plan for the development should accompany any future planning application.

Other

If there are any changes planned for bus infrastructure, for example relocation of existing bus stops or the creation of new bus parking areas, TfGM would request that the applicant liaise directly with TfGM's bus infrastructure which can be contacted at Shelters@tfgm.com.

Suggested Useful Guidance

In relation to walking, the importance of providing and maintaining good quality footways, free from obstruction and wide enough for when they are at their busiest, is critical to encourage and maximise walking levels associated with new developments. Useful guidance on street layouts which encourage walking is provided in Manual for Streets (Department for Transport, 2007). MfS provides guidance on lightly trafficked residential streets, and Manual for Streets 2 (CIHT, 2010) further develops the principles of the first Manual for Streets for application in wider circumstances on busier streets, including town and district centres.

In relation to cycling, infrastructure should be designed in accordance with current Greater Manchester Cycling Design Standards, the latest version of which is available from the TfGM website or by emailing cycling@tfgm.com. In particular, connections to/from and within developments should be designed in accordance with the Key Design Criteria of Safety, Coherence, Directness, Attractiveness and Comfort. A general principle is that infrastructure should be designed to be attractive to those who do not currently cycle, in order to drive the increase in cycling's mode share.

The Bee Network will be the largest joined-up system of walking and cycling routes in the UK and has been developed with all 10 Greater Manchester local authorities. More information on this is available on <https://www.tfgm.com> and TfGM would encourage the applicant to review the map online to determine whether there is an opportunity for this development to connect into the proposed Bee Network.

Air Quality and Dust

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

The relevant policy and guidance documents have been referenced. We would also like you to include reference to the MCC guidance document for developers and take note of the Air Quality guidance document which should be used to inform the assessment and recommendations. You should also note the requirements in respect of EV charging points.

Noise and Vibration

The comments within your Scoping Report are noted and are acceptable in terms of their consideration in the ES. In particular, that operational vibrations being scoped out of the ES.

Section 13.12 refers to commercial and fixed plant assessment in order to protect existing and future residents. Any plant associated with the residential properties, such as ASHP / GSHP/Ventilation etc, will also need to be considered within these noise sources as well as the commercial and fixed plant referred to in the document. In addition, other buildings such as commercial or office will also need to be considered a sensitive receptors with regard to the criteria and not just existing and proposed residential uses.

An AVO overheating assessment will be required and assessment / recommendations would be required to ensure the internal noise criteria will be met without residents relying on openable windows for ventilation. Assessment of any alternative scheme of ventilation will also be required and also assessment and recommendations with regard to insulation of any façade penetrations for air intake / extract for example.

In addition to the above and for information, there will be other matters to address including Fume and Odour from any commercial kitchen extraction equipment, construction management plan, hours of use for commercial / retail uses, restrictions of delivery hours including waste collections to commercial retail uses, Lighting /illuminated signage restrictions regarding any external areas associated with any commercial premises such as hours of use and no music / speakers in external areas, Refuse provision for both commercial and residential.

Sunlight, Daylight and Overshadowing

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

Wind Microclimate

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

Socio-economic

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

Health

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

Climate Change

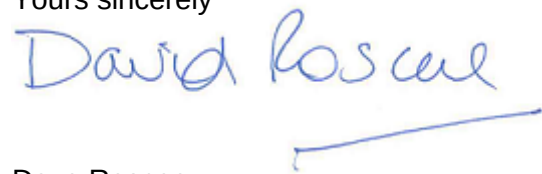
The comments within your Scoping Report are noted and are acceptable in terms of their consideration in the ES.

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
Assistant Director of Planning

APPENDIX – CONSULTEE RESPONSES

Date: 16 February 2023
Our ref: 421528
Your ref: Red Bank Neighbourhood



Jennifer Atkinson
Manchester City Council
jennifer.atkinson@manchester.gov.uk

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

T 0300 060 900

BY EMAIL ONLY

Dear Jennifer,

Environmental Impact Assessment Scoping consultation (Regulation 15 (4) of the Town and Country Planning EIA Regulations 2017): Request for Scoping Opinion - Red Bank Neighbourhood.

Thank you for seeking our advice on the scope of the Environmental Statement (ES) in the consultation dated 09 February 2023, received on 09 February 2023.

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

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

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

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

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

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

Yours sincerely,

Shannon Bowes
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 174-175 and 179-182) 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 have regard to conserving 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 174 and 175). 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 174 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.

The ES should use an appropriate biodiversity metric such as [Biodiversity Metric 3.0](#) together with ecological advice 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 100. 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 174 and

175 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 211 of the NPPF, new sites or extensions to sites for peat extraction should not be granted planning permission.

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

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

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

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

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

Air Quality

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

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

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

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

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

Water Quality

The planning system plays a key role in determining the location of developments which may give rise to water pollution, and hence planning decisions can have a significant impact on water quality, and land. The assessment should take account of the risks of water pollution and how these can be managed or reduced. A number of water dependent protected nature conservation sites have been identified as failing condition due to elevated nutrient levels and nutrient neutrality is consequently required to enable development to proceed without causing further damage to these sites. 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. 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.

Manchester City Council
PO Box 532
Manchester
Lancashire
M60 2LA

Our ref: SO/2023/122911/01-L01
Your ref: Red Bank Neighbourhood
Date: 1st March 2023

FAO: Jennifer Atkinson

Dear Jennifer,

THE TOWN AND COUNTRY PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2017 (AS AMENDED) (THE “EIA” REGULATIONS)

REQUEST FOR SCOPING OPINION – RED BANK NEIGHBOURHOOD:

- **‘APPLICATION 4’ – OUTLINE PERMISSION APPLICATION, ALL MATTERS RESERVED. MIXED USE DEVELOPMENT (CLASSES C3, C2, E, F & SUI GENERIS).**
- **‘APPLICATION 5’ – FULL PERMISSION APPLICATION. RESIDENTIAL DEVELOPMENT CIRCA. 1600 RESIDENTIAL DWELLINGS WITH ASSOCIATED INFRASTRUCTURE AND LANDSCAPING.**

Thank you for requesting an Environmental Impact Assessment (EIA) scoping opinion from the Environment Agency (EA) for the above development proposal. Referral for this scoping opinion request was received on 9th February 2023.

To inform our response below, we have undertaken a review of the following scoping report provided via direct email from Manchester City Council (MCC):

- ‘EIA Scoping Report – Red Bank Neighbourhood’. Prepared by Avison Young on the behalf of Far East Consortium Ltd. Dated: January 2023.

Environment Agency - EIA Scoping Opinion Context

As part of the Joint Venture (JV) between MCC and Far East Consortium (FEC) for the Victoria North ‘Phase 1’ regeneration scheme, it is our understanding that planning permissions for ‘infrastructure and enabling works’ (aiding in facilitating future built-form development) has been previously granted approval by the planning authority / MCC and this package of works is intended to be delivered by the MCC Housing Infrastructure Fund (HIF) Project Team via planning permissions 132252/VO/2021 (known as ‘Application 1’), 133143/VO/2022 (known as ‘Application 2’) and 135190/FO/2022 (known as ‘Application 3’) respectively.

It is our further understanding that FEC is the identified and intended delivery lead for the ‘built-form’ element of Victoria North Phase 1. In connection with this understanding, we acknowledge a combined EIA Scoping Report has been prepared for the following forthcoming planning submissions (indicative plots provided in Appendix V – Planning Strategy Plan):

- **‘Application 4’** - Outline planning application for a residential-led mixed-use

Environment Agency
9, Sentinel House Wellington Crescent, Fradley Park, Lichfield, WS13 8RR.
Customer services line: 03708 506 506
www.gov.uk/environment-agency

Cont/d..

development at Red Bank (including plots RB01 to RB07; RB10; RB12B; RB16 and RB17).

- **‘Application 5’** - Full planning application for a residential-led mixed-use development south of Dantzic Street (including plots NT02 to NT04).

Wider to this EIA scoping opinion request, we would like to take this opportunity to advise the planning authority / MCC that the EA is currently providing technical support to FEC via an established cost-recoverable service level agreement (SLA), for planning associated matters. As part of the SLA established, the EA is providing FEC, for matters within our remit and environmental focus, with technical and strategic advice and guidance. This SLA work includes the various assessment and reporting submissions understood to be intended to be submitted in due course in support of ‘Application 4’ and ‘Application 5’.

From separate discussions and email correspondence held with the FEC project team, superseding the date in which the EIA scoping opinion report was prepared, we are aware that there is an intention by the FEC project team to address appropriately the matters detailed within our letter commentary below. Where possible, as part of this letter response, we have attempted to include relevant updates for the benefit of the planning authority / MCC who we appreciate may not have been party to such discussions.

Environment Agency - EIA Scoping Opinion Response

We note the acknowledgement reached within paragraph 1.7 of the scoping report that development proposals for both applications will meet the criteria of a ‘Schedule 2 Development’ as detailed under the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. We do not seek to dispute this acknowledgment of EIA requirement.

Further to the above, anticipating a determination for EIA requirement, we understand it is the intention of the applicant/developer to prepare a joint Environmental Statement (ES) to support the ‘Application 4’ and ‘Application 5’ planning submissions.

We acknowledge the following determinations have been reached within the scoping report regarding the contents of the forthcoming ES:

- ‘Ecology and Nature Conservation’; ‘Ground Conditions’; ‘Flood Risk and Drainage’; and ‘Climate change’ have been ‘Scoped-in’.
- ‘Waste’ and ‘Major Accidents and Disasters’ have been ‘Scoped-out’

With consideration to matters within the environmental remit and focus of the EA, we can further confirm that we do not seek to dispute the above determination of proposed ES scope and acknowledge, from the wider contents of the scoping report, that there remains an intention to address relevant ‘scoped-out’ matters via separate planning/reporting submission(s).

To assist with the preparation of the forthcoming ES and any other wider technical reporting intended to be associated with the development proposals / applications, we would like to take this opportunity to provide the following advice, guidance, and commentary (see set out below) relating to the contents of the scoping report provided:

Environmental Statement Preparation Approach

We note Table 4.1 of the scoping report lists the assessment scenarios which will be presented in the future ES. In addition to 'typical assessment' offering determination on the individual effects of each development proposal, we welcome the further intention of the applicant / developer to initially assess the combined effects of the developments to be proposed under 'Application 4' and 'Application 5'; in conjunction with the Northern Gateway Strategic Regeneration Framework (SRF). However, in connection with, we would highlight for the purpose of the ES, that within the relevant 'Approach and Methodology' sections of the scoping report, for the topics been determined to be 'scoped-in' (see bulleted above), that presently clear individual assessment approaches have not been established for the 'Application 4' and 'Application 5' development proposals.

Whilst we recognise that the intention is to prepare one ES covering both applications, we advise it is ensured that clear separate assessment approaches are detailed within the forthcoming ES to ensure the potential significant effects of each application individually are fully considered and presented for planning application assessment / determination.

In the instance that clear distinction / individual assessment is not achieved, we advise this would likely create a challenge for assessing and determining the suitability of granting planning permission for each of the forthcoming planning applications. Beyond EIA determination, we note that each planning application submitted will need to be assessed by the planning authority (with EA input) against its individual merits and, in turn, its sustainability not dependent upon any mitigations / measures intended to be delivered as part of a separate application (unless completed/built at point of planning submission) due to the fact that no guarantee / certainty exists that such wider development / intervention will be delivered.

EA Commentary - Ground Conditions and Contamination

As above, we welcome the proposal to 'scope-in' the topic of 'Ground Conditions' within the forthcoming ES. We understand the baseline context provided within the scoping report has been determined from the previous desk study (2019) and ground investigation reporting (2021) prepared by Arup Ltd and which has been previously used to support the HIF works defined under 'Application 1' and 'Application 2'. It is noted and recognised that the development area of both Applications 4 and 5 have been subject to historic industrial activity which, from current ground investigation reporting available, is known to have introduced adverse concentrations of contamination to the underlying ground.

We are aware a large proportion of the development area identified for 'Application 4' is the intended subject to enabling works planned for delivery as part of MCC's HIF works package detailed under 'Application 2'; this includes the remediation of areas whereby adverse contamination has been identified and the creation of development platforms / plots, facilitating future built-form development (intended to be delivered as part of 'Application 4' development. We note and acknowledge that 'Application 2' does not intend to address contamination issues that may arise from the 'Application 5' development area and within development plots 'RB16' and 'RB17' (south bank of the River Irk) specified under 'Application 4'.

We note for paragraph 9.8 of the scoping report that it is the intention of the applicant / developer to produce a Preliminary Risk Assessment for development proposed under

'Application 4' within which 'expected baseline conditions' will be described. Echoing of previous statement regarding not placing reliance upon any development / application not yet delivered / realised and in line with relevant [Land Contamination Risk Management \(LCRM\) Guidance](#), we advise that, at the point of the planning submission, any risk assessment reporting submitted will need to offer assessment of existing ground conditions, not those anticipated to potentially be created as a result of any separate enabling works / planning permission for the development area.

Further the above and cognisant to the JV established, we advise the applicant / developer that additional baseline ground investigation reporting exists for the north bank area of 'Application 4' which has been undertaken by the HIF project team as part of proceedings for 'Application 2'; this further ground investigation reporting identifies the presence of additional forms of contamination (e.g. PFAS) not identified with the prior 2019 and 2021 reporting produced by Arup Ltd. Given the overlap in development areas between the various applications, we advise the applicant / developer that copies of the latest ground investigation reporting (and any subsequent) produced by the HIF project team are obtained as we consider this would form appropriate baseline reporting (in addition to any further reporting produced for the 'Application 5' development area) for the forthcoming ES chapter regarding ground conditions.

Further to the above, we would highlight the assessment approach in this chapter includes limited details on remedial works which fall outside the scope of the 'Application 2' development area. Whilst this is not an issue for the purpose of the scoping report and forthcoming ES chapter, wider to any relevant reporting produced by the HIF project team, we advise that early action is taken to ensure that all necessary information / data required to assess comprehensively ground conditions and determine subsequent remedial requirements is achieved / obtained. Undertaking such action early will prevent the creation of delays and complications at later stage in proceedings. We welcome the opportunity to discuss further with the applicant / developer ground investigation / remedial requirements and in association with this note ongoing work relating to 'Application 5'.

We welcome the recognition made within the scoping report that additional investigative works and minor remedial actions may be required post 'Application 2' works to ensure the site is suitable for its intended use and does not cause an unacceptable risk to sensitive receptors (see paragraphs 9.21 and 9.22 of the scoping report for reference).

Due to the former historic industrial land use(s), soil and/or groundwater contamination that currently exists within the development area in question, we would like to take this opportunity to provide the following general advice / guidance / informatives.

To ensure the associated risks to controlled waters are addressed, we recommend that the developers should:

- Follow the risk management framework provided in Guidance on Land contamination risk management (LCRM) [Land contamination risk management \(LCRM\) - GOV.UK \(www.gov.uk\)](#), when dealing with land affected by contamination
- Refer to our [Guiding principles for land contamination](#) for the type of information that we require in order to assess risks to controlled waters from the site - the local authority can advise on risk to other receptors, such as human health
- Consider using the [National Quality Mark Scheme for Land Contamination Management](#) which involves the use of competent persons to ensure that land contamination risks are appropriately managed
- Refer to the [contaminated land](#) pages on gov.uk for more information

- Refer to [‘The Environment Agency’s approach to groundwater protection’](#)

All investigations of land potentially affected by contamination should be carried out by or under the direction of a suitably qualified competent person and in accordance with BS 10175 (2001) Code of practice for the investigation of potentially contaminated sites. This is in line with guidance outlined under paragraph 183 of the National Planning Policy Framework (NPPF).

Water Framework Directive (WFD) / Water Quality

We acknowledge and welcome the recognition of the Water Framework Directive (WFD) within the ‘Flood Risk and Drainage’ chapter of the scoping report and intention for this topic matter to be ‘scoped-in’ the forthcoming ES (including reference to relevant legislative context and consideration within the existing baseline conditions of controlled water resources).

We advise that the River Basin Management Plans (RBMPs) which outline the objectives of achieving the objectives of the WFD have recently been updated (December 2022), the latest iterations of WFD reporting should be considered within forthcoming assessments. For further details on this topic matter see: [River Basin Management Plans: Updated 2022](#)).

Further to the above, we welcome the intention to complete a WFD Screening and Scoping study to support the forthcoming planning applications. We will continue to engage with the applicant / developer to determine further detailed WFD Assessment requirements for each of the applications. In virtue of the outline nature of Application 4, we anticipate that detailed WFD assessment will form part of wider, phased, pre-commencement conditional requirements specified on any subsequent planning permission granted.

Echoing the earlier contents of this response letter, we advise the assessment approach and impacts for ‘Application 4’ and ‘Application 5’ are detailed individually within the forthcoming ES to ensure various different development factors (e.g. surface water outfall) are appropriately accounted for and assessed.

We would recommend that water quality as well as ecology is actively considered within the scheme given the interaction of the proposed development with the River Irk within the Red Bank Neighbourhood. Under the WFD, the Irk (Wince to Irwell) in this location is a Heavily Modified waterbody (WFD ID: GB112069061131) and is classified as having a ‘moderate’ overall WFD status (ecological: moderate / chemical: fail). This is overall classification is accounted to being the result of the historical physical modifications made to the waterbody and the impacts of both point-source and diffuse pollution.

New development proposals should aim to offer contribution / improve the status of WFD waterbodies (contributing to the attainment of ‘Good Ecological Potential / Status’). In accordance with Regulation 33 of [The Water Environment \(Water Framework Directive\) \(England and Wales\) Regulations 2017](#), it should be ensured that new development proposals do not cause detriment to WFD classifications and do not act to prevent the attainment of ‘good’ status in any category.

As part of any WFD assessment undertaken, we advise acknowledgement is made as to how proposed developments complies with the [Water Framework Regulations 2017](#) and, in this instance, the associated [North West River Basin Management Plan](#)

(RBMP).

Under 'Application 2', we recognise the intention to include interventions to enhance the River Irk, such as, the removal of walls along the watercourse and landscaping to enhance the riparian corridor. We advise that any proposals or interventions along the riparian corridor within 'Application 4' seeks, where possible, to integrate effectively with any known final interventions planned as part of 'Application 2' to maximise the opportunities for enhancement of the River Irk corridor in this area. The retention of a continuous unobstructed watercourse corridor is an essential requirement for the preservation of wildlife habitat, flood flow conveyance and future watercourse maintenance / improvements.

We note paragraph 10.28 of the scoping report states that the EA are currently developing flood risk management schemes within the area and therefore, 'the future of flood risk' is not known and so will need to address further within future reporting. To offer clarification on this matter, the EA, working in partnership with key stakeholders, is involved in the 'Bringing the River Irk to Life' (BRIL) Project whereby the focus is to restore and enhance the River Irk in line with overarching WFD objectives. For details on BRIL see: <https://naturalcourse.co.uk/projects/irk-vision-bringing-the-river-irk-to-life-bril-c15-2/>.

We recommend the applicant / developer studies the opportunities identified under the BRIL project and that these are recognised and accounted for within any design proposals for the riparian corridor made within Application 4 and 5. Although it is acknowledged that the Red Bank Neighbourhood planning boundary only covers a limited section of the River Irk, we advise that any riparian corridor proposals / designs / interventions are supportive to the aims WFD and BRIL - seeking to enhance the formal status and quality of the River Irk.

Given the proposals' proximity to sensitive surface and groundwater receptors (the River Irk and underlying aquifers), careful consideration will need to be given as to how any surface or groundwater arising from construction from the development will be managed. Any new surface water flows generated during construction or during the development's operational phase should be attenuated and treated, where appropriate / necessary, using SUDs solutions (i.e. attenuation ponds, swales etc.) prior to discharging into the River Irk.

Consideration will also need to be given as to how any surface water (further to the matter of discharge rates) arising from the completed development will be appropriately disposed of. Therefore, we advise adopting a multifunctional surface water drainage strategy, based on SuDS management principles outlined in CIRIA C753 guidance which includes good practice development examples already adopted in UK. This is to ensure water and ecological quality does not deteriorate and is potentially enhanced as part of scheme proposals.

Further guidance and information on this topic matter can be found here: [SuDS Manual C753 Chapter List \(ciria.org\)](#).

Biodiversity Net Gain

We welcome the inclusion of the 'Ecology and Nature Conservation' topic which has been 'scoped-in' to the forthcoming ES. We recognise it is the intention to deliver a minimum 10% Biodiversity Net Gain (BNG) uplift across Applications '1' to '5' as part of the Victoria North regeneration scheme, whereby a high-level landscape masterplan

has been produced in support of 'Application 2' to demonstrate how this could potentially be achieved.

We note the EIA Scoping Report states it is the intention to use Biodiversity Metric 3.0 to ensure consistency with previous reporting and supporting information for Applications '1' and '2'. However, from subsequent email correspondence held between the EA and the FEC project team (dated 22 February 2023, 16:42), it is our further understanding that it is now the revised intention of the applicant / developer to use the latest BNG metric developed by Natural England (Metric 3.1). We would advocate for this latter approach utilising the latest metric developed.

Whilst it is noted and acknowledge that the utilisation of the latest BNG metric will result in the variation of biodiversity unit values versus previous BNG assessment undertaken (utilising the former metric), such an approach will ensure the BNG strategy further developed for Applications 4 and 5 can achieve full accordance to latest good practice guidance for this topic matter. Given the existing features situated within / in proximity of the development site (i.e. St. Catherine's Wood and the River Irk riparian corridor), 'Application 4' in particular presents a unique opportunity to create a localised, high quality, integrated green and blue infrastructure network.

Flood Risk

We welcome confirmation provided within the scoping opinion report that a Flood Risk Assessment (FRA) will be prepared and submitted as part the 'Flood Risk and Drainage' chapter for future planning application ES submission(s). We also acknowledge the intention, in conjunction with this, to complete an updated flood modelling exercises enabling the determination of baseline conditions and the subsequent effective assessment of potential future flood risk.

Guidance on the content of a site-specific FRA can be found here:

<https://www.gov.uk/guidance/flood-risk-assessment-for-planning-applications>.

As highlighted in the previous sections, we request individual assessment approaches for 'Application 4' and 'Application 5' are detailed within the final ES prepared.

We acknowledge the reference made to the assessment of the 'peak flood level' as an example to determine the magnitude of impact of the development on flood risk. Whilst we recognise a separate 'Climate Change' chapter has been 'scoped-in' to the ES to take into account the impacts of development on extreme weather events (i.e. extreme rainfall), we advise that the design flood level, which takes the impacts of climate change into account (1% AEP plus appropriate climate change allowance), is also considered in the 'Flood Risk and Drainage' chapter to determine the effects on flood risk and suitable flood risk mitigation measures to be embedded within the development proposals.

Further guidance on the latest climate change allowances for both peak rainfall and peak river flow can be found here:

[Flood risk assessments: climate change allowances - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances).

It is noted that the design event flood levels will be established from the flood modelling exercise intended to be undertaken to support the forthcoming planning applications. In addition, we recommend that a range of return periods are included and considered within the assessment of flood risk. Of note, the FRA undertaken for the individual development proposals should demonstrate how residual flood risk (i.e. the 0.1% AEP

event) is anticipated managed to ensure appropriate mitigation / emergency planning is in place in line with the 'Flood Risk and Coastal Change' section of the Planning Practice Guidance.

Please note, the acceptability of flood evacuation / emergency plans is for the Emergency Planners of MCC to determine as these are not expertise held by the EA.

Further to the above, we would advise that the forthcoming planning applications should, as a minimum, include indicative plans / details of schemes to:

- Dispose of foul drainage
- Dispose of surface water
- Install oil and petrol separators where necessary
- Install trapped gullies where necessary
- Include roof drainage – sealed at ground level
- Treat and remove suspended solids from surface water run-off during construction works (usually presented with a Construction Environmental Management Plan).

Design considerations for the above schemes should not only be isolated to dealing with the management of flood risk but also demonstrate how proposals contribute to enhancing the wider environment, such as, considerations of WFD objectives (as outlined above) and implementation of ecological enhancement where possible.

Flood Risk Activity Permit

The River Irk is designated 'main river' within the boundary of the Red Bank Neighbourhood and therefore, proposed activities on / near the watercourse may require an Environmental Permit granted by the EA. The Environmental Permitting (England and Wales) Regulations 2016 require a permit or exemption to be obtained for any activities which will take place:

- on or within 8 metres of a main river (16 metres if tidal)
- on or within 8 metres of a flood defence structure or culverted main river (16 metres if tidal)
- on or within 16 metres of a sea defence
- involving quarrying or excavation within 16 metres of any main river, flood defence (including a remote defence) or culvert
- in a floodplain more than 8 metres from the river bank, culvert or flood defence structure (16 metres if it's a tidal main river) and you don't already have planning permission

The granting of planning permission does not necessitate the grant of an environmental permit or vice versa. Therefore, we advise consultation is sought with the EA at the earliest opportunity to determine any flood risk activity permitting requirements for the proposed development application(s). For further guidance on this topic matter please also refer to: <https://www.gov.uk/guidance/flood-risk-activities-environmental-permits>.

Waste on-site

The CL:AIRE Definition of Waste: Development Industry Code of Practice (version 2) provides operators with a framework for determining whether or not excavated material arising from site during remediation and/or land development works is waste or has ceased to be waste. Under the Code of Practice:

- Excavated materials that are recovered via a treatment operation can be reused on-site providing they are treated to a standard such that they are fit for purpose and unlikely to cause pollution.
- Treated materials can be transferred between sites as part of a hub and cluster project.
- Some naturally occurring clean material can be transferred directly between sites.

Developers should ensure that all contaminated materials are adequately characterised both chemically and physically, and that the permitting status of any proposed on-site operations are clear. If in doubt, the Environment Agency should be contacted for advice at an early stage to avoid any delays.

For further guidance on this topic matter, we recommend that developers should refer to:

- The [position statement](#) on the Definition of Waste: Development Industry Code of Practice
- The [waste management](#) page on GOV.UK

Waste to be taken off-site

Contaminated soil that is (or must be) disposed of is waste. Therefore, its handling, transport, treatment and disposal are subject to waste management legislation, which includes:

- Duty of Care Regulations 1991
- Hazardous Waste (England and Wales) Regulations 2005
- Environmental Permitting (England and Wales) Regulations 2016
- The Waste (England and Wales) Regulations 2011

Developers should ensure that all contaminated materials are adequately characterised both chemically and physically in line with British Standard BS EN 14899:2005 'Characterization of Waste - Sampling of Waste Materials - Framework for the Preparation and Application of a Sampling Plan' and that the permitting status of any proposed treatment or disposal activity is clear.

If in doubt, the Environment Agency should be contacted for advice at an early stage to avoid any delays.

If the total quantity of hazardous waste material produced or taken off-site is 500kg or greater in any 12 month period, the developer will need to register with us as a hazardous waste producer. Refer to the [hazardous waste](#) pages on GOV.UK for more information.

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We trust you will find the contents of this letter beneficial. However, should you have any queries or questions, then please do not hesitate to get in contact.

Yours sincerely,

Ms Anne-Marie McLaughlin
Planning Advisor

Direct dial [REDACTED]

Direct e-mail [REDACTED]

EIA Scoping Request - Red Bank Neighbourhood - Ecology response

Derek Richardson [REDACTED]

Tue 21/02/2023 08:50

To: Jennifer Atkinson [REDACTED]

Cc: Samuel Bolton [REDACTED]

Dear Jennifer

Thank you for consulting the Ecology Unit on the above EIA Scoping Request. I would broadly be in agreement with the content of the Scoping report prepared by the applicant with regards to Ecology, although I do have the following additional comments.

Biodiversity Net Gain

The Scoping Report states -

"in order to achieve 10% biodiversity net gain, it is anticipated that off-Site compensation would be agreed upon to make up for the biodiversity unit deficit. This exact nature and location of the mitigation will be determined through subsequent dialogue with MCC and other relevant stakeholders"

I would recommend that, by the time an EIA is provided to the Council as part of a planning application, dialogue will have progressed so that a better idea can be provided of the off-site compensation areas and options available. If the applicant is unable to be more specific about the potential for off-site biodiversity enhancements available to achieve a 10% net gain in biodiversity, it is possible that the Council will not be able to give a fully balanced view on the overall biodiversity impacts of the proposals in any future planning decision. I am aware that the Planning Policy section of the Council is working to identify biodiversity off-set sites within the City.

Green Infrastructure

The development represents an excellent once-in-a-lifetime opportunity to introduce high quality Green Infrastructure and Public Realm improvements to the area. I would advise that a comprehensive, holistic, area-wide Green Infrastructure Strategy is prepared as part of any future planning application.

Invasive Plant Species

Invasive plant species, particularly Himalayan Balsam, Giant Hogweed and Japanese Knotweed, are endemic in this area, and particularly along the river course. I would advise that, as part of any future EIA, a method statement is prepared giving details of the measures to be taken to at least control the spread of these plants, and at most to attempt eradication, in the area. The control of these invasive plants would be a significant environmental benefit for the area.

Yours

Derek Richardson

Derek Richardson

Principal Ecologist

Planning

Planning and Transportation

Place

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Dukinfield Town Hall | King Street | Dukinfield | Tameside | SK16 4LA

Tel. [REDACTED]

Mobile. [REDACTED]

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Red Bank Neighbourhood - EIA Scoping (Archaeology)

Ian Miller [REDACTED]

Tue 28/02/2023 08:07

To: Jennifer Atkinson [REDACTED]

Good morning Jen

RE: Red Bank Neighbourhood - EIA Scoping

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

The applicant has submitted an EIA Scoping Report, prepared by Avison Young in January 2023, which acknowledges that the proposed development falls within Schedule 2 (10b) 'Urban Development Projects' of the EIA Regulations. Archaeology and Heritage considerations are afforded a dedicated chapter in the Scoping Report (Section 8). This comprehensive document cites a Historic Environment Desk-based Assessment (HEDBA) that was compiled by WSP in October 2021, and whilst this is not included as an appendix to the Scoping Report, GMAAS was supplied with a copy in November 2022.

The HEDBA is a comprehensive and useful document that provides a thorough assessment of the archaeological resource, its potential significance and the harm of development to that significance. Whilst GMAAS returned a few comments on the HEDBA in November 2022, the report nevertheless proposes an appropriate strategy to offset the harm to any below-ground archaeological remains through a programme of intrusive investigations and recording, the scope of which can be determined in consultation with GMAAS in due course. It is difficult to perceive what value further assessment of the archaeology as part of the EIA process will add to the HEDBA.

Much of the archaeological interest in the application area lies to the north of the River Irk, and is currently subject to detailed consideration as part of the Red Bank Neighbourhood Infrastructure scheme (Application 133143/VO/2022). Archaeological interests are secured by a condition attached to consent (Condition 6), and a WSI that sets out an appropriate scheme of archaeological investigation has been agreed. Whilst there is some archaeological interest in those parts of the Red Bank Neighbourhood project that extend beyond the boundary of the Infrastructure scheme, the potential harm of development to this interest is less than significant.

In view of the archaeological works that have been implemented as part of the Infrastructure scheme and the significance of the archaeological resource beyond that scheme area, it is GMAAS' opinion that archaeology can be scoped out of the EIA, contrary to the conclusion drawn in the Scoping Report. I anticipate that the HEDBA will be updated in the light of any additional information deriving from progress of the Infrastructure scheme and submitted in support of a future planning application for the Red Bank Neighbourhood. The Scoping Report suggests that pre-determination evaluation of the archaeological assets is required, and whilst this would represent best practice in line with the NPPF and local planning policy, GMAAS will be content to secure archaeological interests as a condition attached to a future consent, not least as some of the sites of archaeological interest in the application area are not currently accessible for intrusive investigation.

The above advice relates to the below-ground archaeological interest. In terms of the built heritage, the Scoping Report proposes that detailed consideration should only be afforded to designated heritage assets that lie within the site boundary, which comprises a single Grade II listed bridge. The Conservation & Urban Design Team at Manchester City Council is better placed to comment on the approach to assessing potential impacts on the historic built environment and the setting of designated heritage assets, although GMAAS would be content to see this aspect also scoped out of the EIA.

There are a couple of minor points on the Scoping Report that ought to be noted. In particular, is disappointing that the authors of the Archaeology and Heritage chapter (and the associated HEDBA) fail to make the crucial distinction between the 'Post-medieval Period' (1530s – mid-18th century) and the 'Industrial Period' (mid-18th-century – c. 1914), and erroneously refer to several sites of 19th-century origin as 'post-medieval'. In doing so, the Resource Assessment and the Research Objectives for the Industrial Period set out in the current North West Historic Environment Research Framework have been overlooked (<https://researchframeworks.org/nwrf/industrial/>), which is a serious omission.

Kind regards

Ian



University of
Salford
MANCHESTER

Ian Miller BA FSA

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



SCHOOL OF
**SCIENCE, ENGINEERING
& ENVIRONMENT**

T: [REDACTED] / M: [REDACTED]

Manchester City Council
P O Box 532
Town Hall
Manchester
M60 2LA

Our ref TRA/23/042

Your ref:

3rd March 2023

Dear Sir / Madam

Location: Red Bank Neighbourhood, area of land to the northeast of Victoria Station and to the south of Red Bank, Victoria North, Manchester

Proposal: Residential-led, mixed-use development for the Red Bank Neighbourhood project. This includes, but is not limited to, residential dwellings, commercial / retail uses, cafes, restaurants, community uses, employment uses, and social infrastructure (including a primary school, nursery and health centre) (hereafter referred to as ‘the Proposed Development’)

Thank you for consulting Transport for Greater Manchester (TfGM) on the above scoping proposals. The following comments are offered as advice on transport issues for you to balance against other factors and are made in the context of TfGM’s role in the planning process, as set out in the footnote below.¹

Background

TfGM scoping advice has been requested from Manchester City Council in respect of a residential-led development alongside commercial / retail / food & drink / leisure and educational uses, located within the Red Bank Neighbourhood.

¹TfGM does not have any planning powers and is not a statutory consultee in the planning process. The purpose of the advice offered is to suggest the best way to improve land use / transport integration through the development proposals. Advice is based on the information provided by the applicant, and it is not TfGM’s role to undertake detailed verification unless specifically commissioned to do so. ²TfGM control and manage the traffic signals in Greater Manchester, as such any schemes that alter signalised junctions need to be agreed with TfGM. Additionally, where developments impact on signalised junctions, TfGM have a duty of care to ensure that these impacts are satisfactorily mitigated as part of the planning process.

1. Site Specific Comments

- The EIA document refers to a transport scoping note but this is not available to view.
- Strategic Models should not be used in the determination of base flows.
- Traffic modelling should be undertaken using demand flows to ensure that results are realistic and representative of existing conditions. For congested junctions, demand flows can be derived using traffic count and queue survey data.
- A trip generation and distribution exercise should be provided to the Local Highway Authority (LHA) and TfGM at the earliest possible convenience to inform the scope of the assessment work.
- The TA should review the impact of displacement car parking within and around the site, should the development be reliant upon the use of existing car parks. This should encompass the level of potential displacement of existing trips to surrounding car parks, and / or the impact of new development trips if the existing car parks are full.

2. General Comments

- I. A description of current baseline traffic conditions in the area.
- II. An analysis of injury accidents during a recent five-year period, commenting on whether there are any underlying patterns of injury accidents that might be affected by the development.
- III. Traffic surveys and queue surveys (weekdays) - scope to be agreed with the Local Highway Authority (LHA), TfGM UTC and HFAS. TfGM UTC can be contacted in respect of the availability of any traffic counts in the area that could be used for the assessment.
- IV. A clear estimate of the level of new traffic likely to be associated with the development, based on an inspection of similar (and similarly-located) developments across the UK (excluding London) via the TRICS (or similar) database. The assessment work should be undertaken using a person-trip approach and applying the appropriate modal share percentages from local Census data. Other methodologies to determine trip rates are acceptable but these should be fully explained in the TA.

- V. A clearly defined methodology for determining the distribution / assignment of development trips onto the network i.e. understanding of where such new traffic is likely to distribute to/from, based on data sources such as Census Journey-to-Work statistics and/or vehicle turning proportions at nearby junctions.
- VI. An assessment of traffic levels and impacts at the specified year of opening of the development, and at a future year at least five years later, with due regard for traffic growth (if any).
- VII. An understanding of the likely impacts of the proposed development considered alongside any other nearby committed developments.
- VIII. In the relevant TA, clear diagrams should be provided illustrating the following elements, each individually:
- Base Flows
 - Committed Development Flows
 - Proposed Flows
 - Proposed Distribution
 - Base plus Committed plus proposed development
 - Future plus Committed plus proposed development
- IX. TfGM HFAS recommends an increase of about 30vehs/hr at a junction as an appropriate threshold for considering the necessity of a traffic impact assessment; this is in preference to a percentage-increase threshold, which tends to favour development in already heavily-trafficked areas.
- X. The scope of the junctions to be assessed by detailed modelling should be agreed with TfGM (UTC) and the LHA in advance and will depend upon the outcome of the trip assessment and distribution exercise. For this reason, TfGM would advise that a trip generation and distribution exercise should be issued before submission of the planning application. Once this is undertaken it will be possible to finalise TfGM requirements in terms of the TA. This will largely depend on the amount of trip generation.
- XI. Clear details of proposed vehicular access arrangements including general servicing arrangements. An engineering drawing should be supplied showing the changes to the road network to fully understand the impact of the proposed development.
- XII. A swept path analysis should be provided for any vehicular access.

- XIII. A review of Traffic Regulation Orders on the surrounding streets in the vicinity of the development.
- XIV. An assessment of the likely environmental/traffic impacts of HGVs during the construction process.

3. Site Accessibility by Sustainable Modes

Walking and cycling should form the natural mode choice for shorter trips, and also provide a viable option to facilitate longer trips through providing easy access to public transport. New developments should connect with, and enhance, existing walking and cycling networks in their vicinity, and also provide high quality facilities and networks for walking and cycling within development sites.

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

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

The catchment area for cycling, walking and public transport should be captured in maps. The quality of the routes for pedestrians and cyclists should be described and this should include a description of any signing for cycle routes as appropriate.

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

The TA should include a plan clearly showing details of the proposed pedestrian and cycle access points serving the site and linkages into the surrounding area. Connectivity with local public transport networks should be highlighted. The applicant should consider measures to encourage access by sustainable modes.

Possible measures include but are not limited to the provision of pedestrian crossings, cycleways, cycle parking, new/improved footway ensuring that there are linkages into existing cycle and pedestrian facilities, as well as upgrades to existing bus stops (where appropriate).

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

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

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

4. Mitigation Measures

Impacts of the development should be identified through the above assessment work. The applicant 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 the LHA 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.

5. Travel Plan

A Framework Travel Plan for the development should accompany any future planning application.

6. Other

If there are any changes planned for bus infrastructure, for example relocation of existing bus stops or the creation of new bus parking areas, TfGM would request that the applicant liaise directly with TfGM's bus infrastructure which can be contacted at Shelters@tfgm.com.

7. Suggested Useful Guidance

In relation to walking, the importance of providing and maintaining good quality footways, free from obstruction and wide enough for when they are at their

busiest, is critical to encourage and maximise walking levels associated with new developments. Useful guidance on street layouts which encourage walking is provided in Manual for Streets (Department for Transport, 2007). MfS provides guidance on lightly trafficked residential streets, and Manual for Streets 2 (CIHT, 2010) further develops the principles of the first Manual for Streets for application in wider circumstances on busier streets, including town and district centres.

In relation to cycling, infrastructure should be designed in accordance with current Greater Manchester Cycling Design Standards, the latest version of which is available from the TfGM website or by emailing cycling@tfgm.com. In particular, connections to/from and within developments should be designed in accordance with the Key Design Criteria of Safety, Coherence, Directness, Attractiveness and Comfort. A general principle is that infrastructure should be designed to be attractive to those who do not currently cycle, in order to drive the increase in cycling's mode share.

The Bee Network will be the largest joined-up system of walking and cycling routes in the UK and has been developed with all 10 Greater Manchester local authorities. More information on this is available on <https://www.tfgm.com> and TfGM would encourage the applicant to review the map online to determine whether there is an opportunity for this development to connect into the proposed Bee Network.

I hope you find these comments useful in the scoping process. Should you wish to discuss any matter further please do not hesitate to contact me.

Yours faithfully

Claire Smallman
Infrastructure Development Officer
Email [REDACTED]

Red Bank EIA – March 2023

MCC Highways support the comments made by Transport for Greater Manchester (TfGM) in their scoping response dated 03 March 2023.

In relation to EIA scoping, we can support the scoping in of the following items as detailed within table 11.1 in the scoping report document:

- Active travel
- Public transport
- Road safety
- Traffic impact
- Highway connectivity
- Car and cycle parking
- Access arrangements for emergency vehicles
- Servicing including access arrangements for waste collection vehicles

Reb Bank Neighbourhood scoping opinion

Graeme Souter [REDACTED]

Mon 20/02/2023 15:23

To: Jennifer Atkinson [REDACTED]

Jen

I have reviewed the scoping opinion and I have the following comments:

Section 9 – Ground Conditions

We can accept the construction phase has been scoped in based on potential residual contamination and the operational phase will be scoped out of the EIA and will be dealt with under condition stage

Section 12 – Air Quality

This section has been scoped in which we can accept. The relevant policy and guidance documents have been referenced but the applicant will also need to include reference to the MCC guidance document for developers and take note of the Air Quality guidance document which should be used to inform the assessment and recommendations. The applicant / consultant should also take note of the requirements with regards to EV charge points.

Section 13 – Noise and Vibration

We can accept the proposals for which elements are to be scoped in and out with just operational vibrations being scoped out of the EIA. Section 13.12 refers to commercial and fixed plant assessment in order to protect existing and future residents. The applicant and consultant will need to be aware that any plant associated with the residential properties as part of the development such as ASHP / GSHP/Ventilation etc will also need to be considered within these noise sources as well as the commercial and fixed plant referred to in the document. In addition, other buildings such as commercial or office will also need to be considered as sensitive receptors with regard to the criteria and not just existing and proposed residential uses.

The applicant / consultant will need to be aware AVO overheating assessment will be required and assessment / recommendations will be required to ensure the internal noise criteria will be met without residents relying on openable windows for ventilation. Assessment of any alternative scheme of ventilation will also be required and also assessment and recommendations with regard to insulation of any façade penetrations for air intake / extract for example.

In addition to the above and for information, the applicant will need to be aware that there will be other conditions to address as part of the full application once at that stage which will include but possibly not restricted to conditions relating to Fume and Odour from any commercial kitchen extraction equipment, construction management plan, hours of use for commercial / retail uses, restrictions of delivery hours including waste collections to commercial retail uses, Lighting /illuminated signage restrictions regarding any external areas associated with any commercial premises such as hours of use and no music / speakers in external areas, Refuse provision for both commercial and residential and contaminated land.

Kind regards

Graeme

Graeme Souter
Environmental Protection Officer
Environmental Protection
Environmental Health
The Neighbourhoods Directorate
Manchester City Council

Tel: [REDACTED]

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

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RE: EIA Scoping Request - Red Bank Neighbourhood

Westley Robinson [REDACTED]

Thu 09/02/2023 15:45

To: Jennifer Atkinson [REDACTED]

Cc: Dave Berry [REDACTED]; Gary Lamb [REDACTED]

Hiya Jen,

No comments from Work and Skills in relation to Local Labour, assuming we will be consulted on Local Labour conditional requirements as and when progressing to full planning applications(s).

Dave, Gary, please see for reference you may have to request access.

Regards

Westley Robinson
Work and Skills Specialist
Work and Skills Team
Growth and Development Directorate
Manchester City Council
Manchester Town Hall Extension
Manchester
M60 2LA (postal)
M2 5DB (Sat nav)

Mobile: [REDACTED]

Email: [REDACTED]

 [Sign up for the Work and Skills Bulletin](#) manchester.gov.uk/work Follow the Work & Skills team on Twitter @mccworkskills

From: Work Skills Admin [REDACTED]**Sent:** 09 February 2023 14:04**To:** Westley Robinson [REDACTED]**Subject:** Fw: EIA Scoping Request - Red Bank Neighbourhood

Kind Regards

Work and Skills Team
Growth and Development Directorate
Manchester City Council
Town Hall Extension, Albert Square,
Manchester, PO Box 532,

M60 2LA

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

From: Planning [REDACTED]
Sent: 09 February 2023 13:58
To: Jennifer Atkinson [REDACTED]
Subject: EIA Scoping Request - Red Bank Neighbourhood

The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended) (the "EIA" Regulations) - Request for Scoping Opinion

Red Bank Neighbourhood

Under Part 4, Regulation 15 of the above regulations, I am informing you of a request made to Manchester City Council for a Scoping Opinion regarding the above development. A copy of the developer's Scoping request is attached, which sets out what they believe the scope of the Environmental Impact Assessment (EIA) should be.

 [Red Bank Neighbourhood.pdf](#)

The purpose of the request is to enable the City Council to make clear to the developer what it considers the main effects of the proposed development are likely to be and therefore the topics on which the proposed EIA should focus.

I am required, under the Regulations, to remind you of your obligation to make available, if requested, any relevant information in your possession. However, you are only required to provide information that is in your possession and there is no obligation to undertake research or otherwise to take steps to obtain information that you do not already have.

The City Council has five weeks from the date of the request to provide a formal Scoping Opinion. If you wish to make any comments to aid the Council in the formulation of a Scoping Opinion, please can you respond to jennifer.atkinson@manchester.gov.uk no later than 2 March 2023.

Regards
Anthony Moore
Team Lead  [Red Bank Neighbourhood.pdf](#)

Information, Delivery & Support Team
Planning, Building Control & Licensing
Growth & Development Directorate
Postal address: Manchester City Council, P O Box 532, Town Hall, Manchester M60 2LA
Location address: Level 6 Town Hall Extension, Manchester M2 5DB
Tel: [REDACTED]

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RE: EIA Scoping Request - Red Bank Neighbourhood

Diane Jackson [REDACTED]

Thu 02/03/2023 09:25

To: Planning <[REDACTED]> Jennifer Atkinson [REDACTED]

Hi Jennifer / Anthony,

Thank you for consulting Manchester Airport's Aerodrome Safeguarding authority on the proposed Red Bank Neighbourhood development.

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

When considering the type, scale and design of any development within the Red Bank area, we therefore recommend that consideration of the relevant aerodrome safeguarding criteria, consultation procedures with ourselves and NATS, and any potential impacts on aircraft safety are addressed. This will principally relate to the height of buildings at this location and whether there is any potential interference to RADAR operations. We would recommend that the developer includes an aviation impact assessment with the planning application, especially for the very tall building aspect of the proposal. We do endorse the value of promoting early engagement with stakeholders and the only judge of whether there will be a radar interference issue is NATS. We would therefore urge consultation with them to discuss the implications of proposals as they take shape.

Kind Regards,

Diane

Diane Jackson**Group Aerodrome Safeguarding Officer****Stansted Airport | East Midlands Airport | Manchester Airport**

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

m: [REDACTED]

e: [REDACTED]

www.magairports.com

From: Planning [REDACTED]**Sent:** 09 February 2023 13:57**To:** Jennifer Atkinson [REDACTED]**Subject:** EIA Scoping Request - Red Bank Neighbourhood**WARNING:** This email originated outside of MAG.**DO NOT CLICK** links or attachments unless you recognise the sender and know the content is safe.**The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended) (the "EIA" Regulations) - Request for Scoping Opinion**

Red Bank Neighbourhood

Under Part 4, Regulation 15 of the above regulations, I am informing you of a request made to Manchester City Council for a Scoping Opinion regarding the above development. A copy of the developer's Scoping request is attached, which sets out what they believe the scope of the Environmental Impact Assessment (EIA) should be.

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The City Council has five weeks from the date of the request to provide a formal Scoping Opinion. If you wish to make any comments to aid the Council in the formulation of a Scoping Opinion, please can you respond to [REDACTED] no later than 2 March 2023.

Regards
Anthony Moore
Team Lead

Information, Delivery & Support Team
Planning, Building Control & Licensing
Growth & Development Directorate
Postal address: Manchester City Council, P O Box 532, Town Hall, Manchester M60 2LA
Location address: Level 6 Town Hall Extension, Manchester M2 5DB
Tel: [REDACTED]

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