



**MANCHESTER
CITY COUNCIL**

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12 April 2023

Our reference: JA/DMN

Dear Ms Brown

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

SCOPING REQUEST UNDER PART 4 REGULATION 15(1)

'NORTH STAND MANCHESTER ("THE PROPOSED DEVELOPMENT")

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

Thank you for your request dated 6 March 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 '*North Stand Manchester – EIA Scoping Report*' prepared by yourselves, on behalf of the Applicant Manchester City Football Club, 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 6 March 2023 sets out the proposed chapters that the ES will cover, and the disciplines which you believe should be scoped in and out of the EIA.

These are as follows:

Scoped In

- Air Quality;
- Ground Conditions;
- Noise and Vibration;
- Climate Change;
- Human Health;
- Townscape and Visual Impact;
- Traffic and Transport;
- Water Quality, Drainage and Flood Risk; and
- Wind Microclimate.

Scoped out

- Agricultural circumstances;
- Archaeology;
- Aviation;
- Built Historic Environment;
- Daylight and Sunlight;
- Ecology;

- Television, FM Radio and DAB Radio Reception;
- Lighting; and
- Socio Economic Impacts.

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;
- Canal and River Trust;
- 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 2.19 hectares and comprises the north stand of the Etihad Stadium and associated structural supports, the fan zone with canopies, F&B provision and Club Shop to the north of the Stadium, the landscaped area to the east of the National Squash Centre, the Etihad Stadium Metrolink queuing zone (for the west bound platform) and hardstanding.

The site also includes a vehicular route to connect to Alan Turing Way to the east, which currently comprises surface car parking. A servicing route loops around the Etihad Stadium and runs through the Site east to west to the immediate north of the North Stand.

The site is bound by Joe Mercer Way and the Etihad Campus tram stop to the north. The National Squash centre borders the Site to the west, whilst the area to the east of the site comprises a surface car park. The Site is bounded to the south by the remainder of the Etihad Stadium.

Further to the north is the Ashton Canal, which comprises of towpath and cycle path routes linking the Site to Manchester City Centre, elsewhere in East Manchester and further afield.

To the north of the Ashton Canal is the under-construction Co-op Live arena, which was granted Planning Permission on 23 Oct 2020 and is scheduled to complete towards the end of 2023 (Ref. 126431/FO/2020). The Manchester Tennis and Football Centre is located further to the north-west of the Site, beyond the Ashton Canal.

Philips Park, with Philips Park Cemetery located to the north of the Park, are located to the north-east of the Site and Alan Turing Way and are separated by the River Medlock.

SENSITIVE RECEPTORS

The development site is not located within the Greater Manchester Combined Air Quality Management Area (AQMA) but due to its proximity to Alan Turing Way, which is located in the AQMA, the development is likely to impact on the AQMA both during construction and when the development becomes operational.

The site is not within, nor does it contain, any ecological designations including sites of specific interest (SSSI), sites of biological importance (SBI) or special protection areas (SPA). The Ashton Canal SBI is located 50 m to the north of the Site; separated from the canal by the Metrolink tracks. Clayton Vale Local Nature Reserve is located 734 m to the northeast of the Site but separated by Alan Turing Way.

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

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

1. Ashton Canal Lock Number 6 Immediately East of Forge Lane – Grade II
2. Ashton Canal Lock Keepers Cottage on South Side of Lock Number 7 of Ashton Canal – Grade II

3. Ashton Canal Lock Number 7 with Roving Bridge Immediately East of Mill Street Bridge – Grade II

4. Ashton Canal Bridge Number 9 Over Ashton Canal (Mill Street Bridge) at West End of Lock Number 7 – Grade II

5. Philips Park – Grade II

PROPOSED DEVELOPMENT

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

The Proposed Development would consist of the expansion of the north stand which would increase the capacity of the Etihad Stadium to over 60,000. This is an alternative design to that approved as part of the extant consent 105367/JO/2014/N2 but would not increase the capacity beyond 62,170 which was approved as part of the extant consent. It would also not increase the height previously approved at 117.42 metre AOD (which is also the south stand mast height).

The proposals also consist of an expanded and covered 'City Square' fan zone which would be located adjacent to the north stand with associated development (which could comprise food and drink facilities (up to 3,093 sqm), workspace, a new club shop and club museum (up to 3,505 sqm) and a hotel (up to 15,306 sqm).

No additional car parking is proposed as part of the development. Servicing would take place via the route that currently loops around the Etihad Stadium. In addition, a new vehicular access route would be included from Alan Turing Way to provide a drop off point to support the operations of the hotel.

There would be associated public realm with the proposal which would be used on match and event days as well as non-event days. The pedestrian routes to the development would be along Joe Mercer Way from the north (including from the Etihad Metrolink Stop) with pedestrians likely to have opportunities to directly enter the square or take pathways both left and right leading to entrance points around the rest of the stadium.

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 identified as such in the technical chapters of the ES.

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

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

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

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

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

Cumulative effects

The committed developments summarised in Appendix 2 appears to be acceptable.

Cross references and summarising of the findings

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

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

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

ENVIRONMENTAL MATTERS TO BE SCOPED OUT OF THE ES

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

Agricultural circumstances

The Scoping Report states the site is on brownfield land in an urban environment. There will be no likely significant effects on agriculture and therefore can be scoped out of the EIA.

Archaeology

The Scoping Report concludes that although there is evidence of remains, this would be of local to regional significance only and unlikely to be of national significance. Accordingly, Archaeological can be scope out of the ES on the basis that a detailed archaeological desk based assessment is submitted with the planning application.

Aviation

The Scoping Report acknowledges that consultation would be required with Manchester Airport Group (MAG) and NATS. I concur with your conclusion that aviation would not result in any likely significant impacts that would warrant consideration by an EIA and can therefore be scoped out of the ES provided that appropriate consultation takes place.

Built Historic Environment

The Scoping Report acknowledges the hisotirical context of the development site and concludes that it would be appropriate to assess the impact of the development on this through the Townscape and Visual Impact Assessment. I concur with your conclusion that built historic environment would not result in any likely significant impacts that would warrant consideration by an EIA and can therefore be scoped out of the ES provided that appropriate consultation takes place.

Daylight and Sunlight

The Scoping Report concludes the impacts in this regard would not be significant provided the planning application is supported by appropriate evidence, I can confirm

that Daylight and Sunlight can be scoped out of the ES on the basis that a detailed assessment is submitted with the planning application.

Ecology

The impact on ecology is considered to be of no more than local significance. The protected species interest in the development site is low with the main impacts being the loss of vegetation and habitats. I accept that an ecological assessment is capable of being scoped out of the ES and can instead form part of the supporting documents to the planning application and should include measure to improve the nature conservation value of the this urban area including biodiversity net gain.

Television, FM Radio and DAB Radio Reception

The Scoping Report notes that a baseline of the local conditions would be established which would allow reassessment once the development is complete and mitigation devised if necessary. I can confirm that Telecommunications can be scoped out of the ES provided that the planning application is supported by an appropriate report which support these conclusions.

Lighting

There are likely to be no significant effects which would require consideration by an EIA in respect of lighting. I confirm lighting can be scoped out of the ES provided the planning application is supported by an appropriate report which supports these conclusions.

Socio Economic

Whilst I note that you consider socio economic impacts can be scoped out of the ES, I could that it should be scoped in on the basis that the development would have effects in this regard which are of more than local significance.

Summary

I agree that some of the matters you have identified to be scoped out of the ES are appropriate. I am of the opinion, however, that Socio Economic should be part of the ES.

The planning application must be supported by appropriate documentation, including any mitigation, to minimise any effects as a result of the Proposed Development from the matters capable of being scoped out. The City Council reserves the right to reconsider this position following a more detailed consideration of the reports which will accompany the planning application.

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.

- Air Quality;
- Ground Conditions;

- Noise and Vibration;
- Climate Change;
- Human Health;
- Townscape and Visual Impact;
- Traffic and Transport;
- Water Quality, Drainage and Flood Risk; and
- Wind Microclimate.

As highlighted above, you should also include Human Health within relevant chapters within the ES.

General Comments

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

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

Air Quality

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

Ground Conditions

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

Noise and Vibration

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.

Human Health

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

Townscape and Visual Impact

The comments within your Scoping Report are noted and are acceptable in terms of their consideration in the ES. You should note the comments from the Canal and River Trust who have requested a further viewpoint from lock 6.

Traffic and Transport

The Scoping Report states that the effects of construction and operational traffic will be assessed in consideration of the predicted net change in traffic flows by comparing the

likely trip generation of construction and operational traffic against future baseline traffic conditions based on the following IEMA Guideline rules:

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

Any road links that meet these criteria indicate the potential for significant effects and will be scoped into the assessment, however at this stage, the volume/distribution of development traffic for the construction and operational phases (and list of committed developments) are not yet confirmed and are subject to the outcomes of the Transport Assessment (TA) scoping.

At this stage, it is therefore not to determine with certainty which links could experience traffic volumes in excess of the IEMA thresholds. It is therefore proposed to scope in all of the potential environmental effects relating to Traffic and Transport into the ES and assess the magnitude of traffic increases against the IEMA thresholds at the outset of the ES Chapter.

The Scoping Report states that the assessment for the TA will focus on the impact of the commercial uses (office and hotel). As it is not proposed to increase parking provision, the volume of traffic accessing the stadium would not increase from that already assessed/approved under previous applications. It is however requested that the EIA assesses the full development proposals (regardless of extant permissions) in order to ensure the full effects of the proposals in terms of Traffic & Transport are assessed and appropriate mitigation measures are taken forward.

Whilst the proposals will have no additional parking provision, the operational phase would still generate a number of daily vehicular trips associated with servicing/deliveries, taxis/drop-offs (utilising the potential new drop-off provision) and car trips with drivers utilising alternative nearby car-parks which should also be taken into consideration.

Other highways impacts (including multi-modal trip generation and accessibility) would be assessed further within the submitted TA, with mitigation measures where necessary and measures to promote access by sustainable modes identified within a supporting Travel Plan.

There will be a requirement management and coordination of construction activities with reference to ongoing/imminent construction works in the locality within the supporting Construction Environmental Management Plan/Construction Management Plan with the cumulative effects of construction considered in terms of other construction activity occurring concurrently as part of the Traffic & Transport ES chapter.

The following points should also be taken into consideration as part of the Traffic & Transport assessment:

- Assessment should not only consider construction trip generation but also traffic redistribution impacts associated with any required traffic management/temporary road closures during the construction phase; and
- Assessment should consider any required traffic management/temporary road closure impacts on pedestrians during the construction phase.

Whilst it is noted that a number of the IEMA environmental effects would be considered within other technical assessments of the ES (including noise, vibration, visual impacts, air pollution, dust and dirt, ecological impact and heritage and conservation), appropriate traffic data should be provided to inform the associated assessments.

The following receptors have therefore been identified as having the potential to be subject to likely significant effects: severance, driver delay, pedestrian delay, pedestrian amenity, fear and intimidation and accidents and safety which is acceptable.

The raw data and calculations for the distribution and turning counts (once collected) will need to be provided for review. Strategic model flows should NOT be used for any of the assessments.

- The scoping information provided states that, *"It has been agreed with MCC and TfGM officers that any traffic modelling can be limited to the local junctions used to access the site from the A6010 Alan Turing Way (i.e. Gate 2 and Gate 3). This modelling will utilise existing traffic survey data collected in 2019 as part of the Campus Strategy Transport Assessment."*

It should be highlighted that whilst the junctions to be assessed have been agreed, the traffic flows used in the modelling has not. Therefore, the suitability of the 2019 flows should be demonstrated. Any existing data sources should be used to justify the use of the 2019 flows. Please note that TfGM have an ATC on Pottery Lane near the Sports City Way junction.

- Although signal timings have not been changed since the 2019 application, advice regarding correctly modelling the appearance of demand dependent stages has changed. TfGM are able to provide FOC signal monitoring logs for the two sites to ensure that the junctions are modelled as correctly as possible.
- The 'busiest' evening peak should be used for the non-event test. This can be determined from the TfGM ATC and not based on an assumption.
- With respect to Paragraph 2.7, mitigation is welcome, however this should help address existing problems with the walking route (reflecting the mitigation provided for the Co-Op Arena).
- Management of events by the TfGM travel teams is made more difficult by lack of visibility from the TfGM control room. It is suggested that extra TfGM CCTV cameras are funded to help better manage events.

There is no mention in the scoping document of the management of events; reference to the existing Traffic Management plan and implementation should be referred to and addressed.

The existing pre- and post- event conditions for transport to and from the stadium should be provided. This should particularly cover the walking and cycling trips to and from the stadium to the city centre.

It would be hoped that the application to extend the stadium provides the potential to significantly improve the walking and cycling trips to and from the stadium. The mitigation should address the existing problems.

It should be highlighted that since 2014 the frequency of the tram service has increased and hence the interaction between the tram and walking trips has increased.

With respect to Paragraph 2.1, the guidance used in the TA should include changes in design guidance for cycling facilities issues by DfT in 2020 – LTN1/20.

The ES chapter should also include the following:

- A description of current baseline traffic conditions in the area.
- 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.
- 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.
- 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.
- 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.
- 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).
- An understanding of the likely impacts of the proposed development considered alongside any other nearby committed developments.
- 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
- 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.
- 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.
- 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.

- 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.
- A swept path analysis should be provided for any vehicular access.
- A review of Traffic Regulation Orders on the surrounding streets in the vicinity of the development.
- 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.

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

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.

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.

Water Quality, Drainage and Flood Risk

I have not yet received comments from the City Council's Flood Risk Management Team. I will provide these in due course.

Wind Microclimate

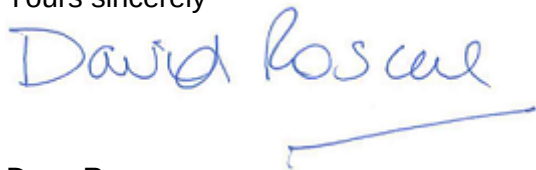
The comments within your Scoping Report are noted and are acceptable in terms of their consideration in the ES.

FURTHER INFORMATION

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

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

Yours sincerely

A handwritten signature in blue ink that reads "Dave Roscoe". The signature is written in a cursive style. Below the signature is a horizontal line, also in blue ink, which appears to be a flourish or a separator.

Dave Roscoe

Deputy Director of Planning

Date: 13 March 2023
Our ref: 425043
Your ref: Etihad North Stand



Manchester City Council
BY EMAIL ONLY

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

T 0300 060 900

Dear Sir or Madam

Environmental Impact Assessment Scoping consultation (Regulation 15 (4) of the Town and Country Planning EIA Regulations 2017): Request for Scoping Opinion Etihad North Stand Manchester.

Location: Etihad Stadium Manchester

Thank you for seeking our advice on the scope of the Environmental Statement (ES) in the consultation dated 08 March 2023 ,received on 08 March 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 faithfully

Julian Clarke
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 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.

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](#)

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

[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
Town Hall Albert Square
Manchester
Lancashire
M2 5DB

Our ref: SO/2023/122998/01-L01
Your ref: EIA Etihad North Stand
Date: 13 March 2023

FAO: Jennifer Atkinson

Dear Jennifer,

THE TOWN AND COUNTRY PLANNING ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2017, PART 4, REGULATION 15:

ENVIRONMENT AGENCY ENVIRONMENTAL IMPACT ASSESSMENT (EIA) SCOPING OPINION REQUEST - ETIHAD NORTH STAND EXTENSION, MIXED-USE

ETIHAD STADIUM, ASHTON NEW ROAD, MANCHESTER M11 3FF

Thank you for requesting an EIA scoping opinion from the Environment Agency (EA) for the proposed redevelopment/extension of the north stand of the Etihad Stadium / City of Manchester Stadium in accordance with Regulation 15, Part 4, of the Town and Country Planning 'EIA Regulations' 2017.

Referral for this EIA scoping opinion request was received on the 8th March 2023. To inform our scoping opinion/position set out below, we have undertaken a review of the following EIA scoping report provided (via email) by Manchester City Council:

- EIA Scoping Report – North Stand Manchester. Prepared by Deloitte on the behalf of Manchester City Football Club Ltd. Dated March 2023.

As detailed within the section 1.3 of the EIA scoping report provided, we note and acknowledge the final development subject of this scoping opinion request has not yet been determined/decided. In virtue of this current limitation, we further note and acknowledge the stated intention (section 1.4) of the developer's agent, Deloitte, to seek EIA scoping opinion determination from Manchester City Council (MMC) based on the current understood maximum potential quantum of the proposed development; with acknowledgment that should the current maximum potential quantum be exceeded that a revised EIA scoping opinion would likely be warranted.

For the purpose of this EA scoping opinion, please be advised that we understand the maximum potential quantum of the proposed development to be expansion to the North Stand of the Etihad Stadium (facilitating an additional 60,000 spectators/attendees) and also the creation of a permanent mixed-use entertainment and leisure destination (with associated infrastructure) within the development area specified under Appendix 1 of the EIA Scoping Opinion report provided/outlined above. Should our understanding of the maximum potential development quantum prove to be incorrect, then we ask that clarification is provided at the earliest possible opportunity. However, we also advise that our opinion statement set out below is unlikely to alter provided the development area in question remains unaltered.

Further to the above, we also advise our (the EA's) awareness of the fact that the

Environment Agency
Richard Fairclough House Knutsford Road, Warrington, WA4 1HT.
Customer services line: 03708 506 506
www.gov.uk/environment-agency

Cont/d..

proposed development area is currently the intended subject of preliminary/advanced site preparation works under planning application 135764/FO/2022 (currently pending planning determination). In virtue of this application (135764/FO/2022) being undetermined/unimplemented at the time of this scoping opinion consultation, we advise that this has not been a material consideration in our assessment of the EIA scoping opinion report's contents / proposals for addressing significant environmental constraints.

Environment Agency Scoping Opinion – Etihad North Stand Expansion

As detailed under section 1.9 of the EIA scoping report submitted, we note the proposed development is considered by the planning agent to meet the development criteria of Schedule 2, 10(b) of the EIA Regulations 2017, exceed the relevant thresholds for EIA defined development and, in turn, acknowledgement of the likely need to prepare an Environmental Statement (ES) for the final intended development proposals. We do not seek to dispute this determination and/or the intention to prepare an ES for the final proposed development.

From Section 5 of the EIA scoping report we note the following technical chapters, relevant to the remit and environmental focus of the EA, have been 'scoped-in' to the forthcoming ES:

- Ground Conditions
- Climate Change
- Water Quality

We do not seek to dispute the intended contents of the forthcoming ES and/or determination of 'significant' environmental factors. We are also satisfied, from the wider contents of the EIA scoping report and for matters within EA remit/focus, that the topics/chapters 'scoped-in' should be adequately addressed through any subsequent ES produced in accordance with the EIA scoping report (listed above).

--

Should you have any queries or questions regarding the contents of this letter, then please do not hesitate to get in contact.

Yours sincerely,

Mr Andy Davies
EA Green Growth Team Project Manager

Direct e-mail [REDACTED]

EIA Scoping Request - Etihad North Stand - Archaeology

Ian Miller [REDACTED]

Thu 09/03/2023 08:23

To: Jennifer Atkinson <jennifer.atkinson@manchester.gov.uk>

Good morning Jen

RE: EIA Scoping Request - Etihad North Stand

Thank you very much for consulting GMAAS on the above request for a Scoping Opinion.

The applicant has submitted an EIA Scoping Report, prepared by Deloitte in March 2023, which identifies that the proposed development falls within Schedule 2 (10b) of the EIA Regulations. The Scoping Report includes a short section on archaeology (paragraphs 4.4 – 4.8), which summarises the previous archaeological input into the application site. It also notes, quite correctly, that a Written Scheme of Investigation (WSI) for an archaeological watching brief has been agreed recently and will be implemented as part of the current Site Improvements Works. This will be focused on the area around the North Stand, as no other parts of the site have any potential to contain archaeological remains of interest.

In view of the watching brief that has been secured by the Site Improvements Works, GMAAS is happy to advise that archaeology can be scoped out of the EIA.

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

T: [REDACTED] / M: [REDACTED]



SCHOOL OF
**SCIENCE, ENGINEERING
& ENVIRONMENT**

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

Our ref TRA/22/475

Your ref:

29th March 2023

Dear Sir / Madam

Location: **Etihad North Stand**

Proposal: The feasibility study is considering a potential mix of uses- expanded North Stand which could increase capacity of the Etihad Stadium to over 60,000; expanded and covered 'City Square' fan zone adjacent to the North Stand with associated development components (which could comprise food and drink facilities (up to 3,093 sq. m), workspace, a new club shop and club museum (up to 3,505 sq. m), and a hotel (up to 15,306 sq. m)) to support activity levels and the wider amenity offer of the Etihad Campus

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 the proposed expansion of the North Stand at the Etihad Stadium.

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

TfGM previously provided guidance in respect of the scoping proposals on the 8th November 2022, and these comments are therefore maintained and reiterated below, along with a copy of the previous scoping note provided for reference:

- The raw data and calculations for the distribution and turning counts (once collected) will need to be provided to TfGM for review. Strategic model flows should NOT be used for any of the assessments.
- The scoping information provided states that, *“It has been agreed with MCC and TfGM officers that any traffic modelling can be limited to the local junctions used to access the site from the A6010 Alan Turing Way (i.e. Gate 2 and Gate 3). This modelling will utilise existing traffic survey data collected in 2019 as part of the Campus Strategy Transport Assessment.”*

It should be highlighted that whilst the junctions to be assessed have been agreed, the traffic flows used in the modelling were not agreed. Therefore, the suitability of the 2019 flows should be demonstrated. Any existing data sources should be used to justify the use of the 2019 flows. Please note that TfGM have an ATC on Pottery Lane near the Sports City Way junction.

- Although signal timings have not been changed since the 2019 application, UTC advice regarding correctly modelling the appearance of demand dependent stages has changed. TfGM are able to provide FOC signal monitoring logs for the two sites to ensure that the junctions are modelled as correctly as possible.
- The 'busiest' evening peak should be used for the non-event test. This can be determined from the TfGM ATC and not based on an assumption.
- With respect to Paragraph 2.7, mitigation is welcome, however this should help address existing problems with the walking route (reflecting the mitigation provided for the Co-Op Arena).
- Management of events by the TfGM travel teams is made more difficult by lack of visibility from the TfGM control room. It is suggested that extra TfGM CCTV cameras are funded to help better manage events.

- There is no mention in the scoping document of the management of events; reference to the existing Traffic Management plan and implementation should be referred to and addressed.
- The existing pre- and post- event conditions for transport to and from the stadium should be provided. This should particularly cover the walking and cycling trips to and from the stadium to the city centre.
- It would be hoped that the application to extend the stadium provides the potential to significantly improve the walking and cycling trips to and from the stadium. The mitigation should address the existing problems.
- It should be highlighted that since 2014 the frequency of the tram service has increased and hence the interaction between the tram and walking trips has increased.
- With respect to Paragraph 2.1, the guidance used in the TA should include changes in design guidance for cycling facilities issues by DfT in 2020 – LTN1/20.

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. 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.
- XII. 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.

- XIII. A swept path analysis should be provided for any vehicular access.
- XIV. A review of Traffic Regulation Orders on the surrounding streets in the vicinity of the development.
- XV. 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]

Manchester City Council
By email planning@manchester.gov.uk

Our ref: DC/23/806
Date: 27-MAR-23

Dear Planning Team,

Location: Etihad North Stand, Manchester

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

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

The key areas for consideration by the applicant in the detailed design process and in the preparation of a planning application can be summarised as follows:

- **Asset protection** for existing water and wastewater infrastructure which is located within or close to the proposed redline boundary including water and wastewater assets;
- **Easements** crossing the proposed development site;
- The delivery of sustainable **foul and surface water drainage proposals**;

We deal with the above matters in further detail below.

Asset Protection

We would like to draw the applicant’s attention to the various water and wastewater assets and legal easements that lie within and adjacent to the application site. Following our review of the proposed development’s location contained within the scoping report, we have concern the new development is in close proximity or directly over these assets.

It is important to note that we will not permit development over or in close proximity to our assets. These assets impacted by the proposed works may need to be diverted and/or protection measures put into place during the works. The location of the assets will be material to the development proposals so it is deemed to be in the applicants’ interest to clarify the exact position and condition of these assets prior to the submission of any formal planning application.

All of our assets will need to be afforded due regard as serious complications could arise if they are not given due consideration. We would recommend the LPA uses their access to [Safe Dig](#) to confirm the indicative location of any water and wastewater assets. We also recommend that the applicant engages with us at the earliest possible opportunity to identify the assets which may be impacted by these proposals. Our assets will need to be fully considered as part of the design process, with the potential impacts identified at an early stage and suitable mitigation and protection measures and/or diversions incorporated into the design, construction and ongoing operation of the application site. If the applicant hasn't already done so, they can take advantage of our free pre-development service by visiting our website <https://www.unitedutilities.com/builders-developers/your-development/planning/pre-development-guidance/>.

Where United Utilities assets exist, the level of cover to United Utilities pipelines and apparatus must not be compromised either during or after construction and there should be no additional load bearing capacity on pipelines without prior agreement from United Utilities. This would include earth movement and the transport and position of construction equipment and vehicles.

Consideration should also be applied to United Utilities assets which may be located outside the applicant's red line boundary. Any construction activities in the vicinity of our assets must comply with our 'Standard Conditions for Works Adjacent to Pipelines', a copy of which can be found on our website, and national building and construction standards. It is the applicant's responsibility to ensure that United Utilities' required access is provided within their layout and that our infrastructure is appropriately protected. The developer would be liable for the cost of any damage to United Utilities' assets resulting from their activity.

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

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

Email: WastewaterDeveloperServices@uuplc.co.uk

Email: DeveloperServicesWater@uuplc.co.uk

United Utilities Legal Easements

According to our records there are easements crossing the proposed development site which is in addition to our statutory rights for inspection, maintenance and repair. The following easements, Z1465, Z1465A and Z1589 contain restrictive covenants that must be adhered to. It is the responsibility of the developer to obtain a copy of the document, available from United Utilities Legal Services or Land Registry and to comply with the provisions stated within the document. Under no circumstances should anything be stored, planted or erected on the easement width. Nor should anything occur that may affect the integrity of the pipe or United Utilities' legal right to 24 hour access.

The applicant should contact our Property Services team to discuss how the easements referenced below affect the proposals and that any variations required can be considered at the earliest opportunity. It's advised the applicant contacts PropertyGeneralEnquiries@uuplc.co.uk

Foul and Surface Water Drainage Strategy

We would strongly recommend that a detailed site-wide foul and surface water drainage strategy is prepared to inform any future planning application at this site. This strategy should fully assess site topography, infiltration potential, all forms of flood risk, existing water features and naturally occurring flow paths to identify where water will naturally accumulate and determine whether pumping may be required. Please note we would wish to limit the number of pumping stations on site in the interests of sustainable development. Any surface water strategy should be integrated throughout the development and comprise multi-functional sustainable drainage at the surface level unless underground infiltration is discounted. Green infrastructure and SuDS requirements should be integrated and we would not wish to see a predominance of traditional underground piped storage systems, in the interests of high quality place making and to ensure development is resilient to the challenge of climate change.

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

If the delivery of the proposed development is to be phased, the strategy for infrastructure should demonstrate how each phase interacts with subsequent phases. United Utilities would like to understand the proposed programme and the phasing of the development to best inform the drainage strategy and the delivery of other associated infrastructure. As development progresses and future phases are brought forward, the overarching drainage strategy must be updated and agreed with the local planning authority to reflect any changing circumstances as each phase of the development comes forward.

Other Matters for Consideration

Wastewater Adoption – Including SuDS

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

Water Efficiency, Supply and Metering (if applicable)

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

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

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

Contacts

We wish to highlight our free pre-application service for developers to discuss and agree drainage strategies and water supply requirements. We cannot stress highly enough the importance of developers contacting us as early as possible. Enquiries are encouraged by contacting:

Website

For detailed guidance on water and wastewater services, including application forms and the opportunity to talk to the Developer Services team using the ‘Live Chat’ function, please visit:
<http://www.unitedutilities.com/builders-developers.aspx>

Email

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

Water mains and water supply, including metering - DeveloperServicesWater@uuplc.co.uk
Public sewers and drainage - WastewaterDeveloperServices@uuplc.co.uk

Telephone - [0345 072 6067](tel:0345 072 6067)

Property Searches (for asset maps):

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

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

The position of the underground apparatus shown on asset maps is approximate only and is given in accordance with the best information currently available. United Utilities Water will not accept liability for any loss or damage caused by the actual position being different from those shown on the map.

Summary

Moving forward, we respectfully request that the Council continues to consult with United Utilities for all future planning applications associated with this application site. We are keen to continue working in

partnership with all relevant stakeholders to ensure the proposals are delivered in the most sustainable way and that our existing water and wastewater assets, including the existing operational wastewater treatment works, are given due consideration at this early stage in the planning application process.

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

We would be grateful if you could send a copy of this letter to the applicant.

Yours faithfully

Planning, Landscape and Ecology Team

Manchester City Council
PO Box 532
Town Hall
Manchester
M60 2LA

Your Ref Etihad North Stand

Our Ref CRTR-PLAN-2023-38478

Tuesday 28 March 2023

Dear Jennifer Atkinson

Proposal: Etihad North Stand

Location: Etihad Stadium, Ashton New Road, Manchester

Waterway: Ashton Canal

Thank you for your consultation.

We are the charity who look after and bring to life 2000 miles of canals & rivers. Our waterways contribute to the health and wellbeing of local communities and economies, creating attractive and connected places to live, work, volunteer and spend leisure time. These historic, natural and cultural assets form part of the strategic and local green-blue infrastructure network, linking urban and rural communities as well as habitats. By caring for our waterways and promoting their use we believe we can improve the wellbeing of our nation. The Trust is a statutory consultee in the Development Management process.

The Trust owns and maintains the Ashton Canal which passes to the northern of the development site, with the Metrolink tracks on the intervening land. The Trust would wish to see any potential impacts on; our waterway users (boaters, towpath users and wildlife); infrastructure (the canal, bridges, culverts, embankments or cuttings etc); or the habitats that our waterway support; fully identified and addressed within the Environmental Statement and supporting application documents. It would be important to maintain our waterways and navigational safety along the canals both during construction and operation of the development. In relation to the specific topic areas that might be assessed within an Environmental Statement.

Ground conditions

The document at page 33 considers the canal as a potential receptor to contaminants, but notes the Metrolink on the intervening land and considers that pathways for contaminants is unlikely. We would agree that the risk to the canal via run-off from the site would be very low. The main potential risk to the canal would be via dust and material being blown towards the canal. These concerns could be addressed via a Construction Environment Management Plan. It would be important that any watercourses that pass through or adjacent to the site are protected from silty run-off/contamination.

Biodiversity

The waterway potentially supports rich biodiversity, and the development could have an adverse impact on the ecology of the waterway. As highlighted, water quality must be protected during and post works, with

Canal & River Trust

Fradley Junction, Alrewas, Burton-upon-Trent, Staffordshire DE13 7DN

T 0303 040 4040 E canalrivertrust.org.uk/contact-us W canalrivertrust.org.uk

consideration given to protecting the wildlife corridors along and to the canal from, water pollution, air pollution and light pollution during construction and during the operation of the development.

The report notes the Ashton Canal SBI is located 50m to the north of the Site and Rochdale SAC. We note the Ecological survey are included in Appendix 4 of the document which appear to suggest there would be no impact on the ecology of the canal. Increased traffic movements associated with the expansion of the stadium should be considered and assessed.

We note the shading study which has been submitted which does show some shading of the canal in winter months when the sun is low.

Archaeology and Cultural Heritage

In terms of heritage, the report notes that the Historic environment would be scoped out of the Environmental Statement. We note that a number of canal related assets are noted within the report including:

- Ashton Canal Lock Number 6 Immediately East of Forge Lane – Grade II
- Ashton Canal Lock Keepers Cottage on South Side of Lock Number 7 of Ashton Canal Grade II
- Ashton Canal Lock Number 7 with Roving Bridge Immediately East of Mill Street Bridge – Grade II
- Ashton Canal Bridge Number 9 Over Ashton Canal (Mill Street Bridge) at West End of Lock Number 7 – Grade II

We note that the impact on the setting of the canal related assets would be assessed within a Heritage Impact Assessment. The canal corridor should be assessed as a non-designated heritage asset in its own right as part of this assessment.

Landscape and Visual Impacts

There are potentially significant temporary and permanent visual effects to the area during and post construction which would affect the current character, tranquillity and experience of the waterways as well as permanent visual effects following completion of the development. This should be fully considered and addressed within the Environmental Statement.

The fact that the development is immediately adjacent to the canal corridor means it should still be fully considered in any impact assessment. The waterway and its users (boaters and towpath users) should be recognised as visual receptors with high sensitivity within the LVIA.

Appendix 6 on page 172 includes the TVIA with viewpoint 2 noted as being from the Lock Keepers Cottage, this is really more a view from the highway as opposed to the canal corridor. Really viewpoint 4 is the only assessment from the canal view to assess the potential impact for canal users in the immediate environs of the site. Ideally a further viewpoint would be assessed from Lock no.6 directly to the east of Forge Lane.

The above comments are given without prejudice to any further comments or concerns that may be raised by the Trust in our capacity as a statutory consultee during the application process.

Please do not hesitate to contact me with any queries you may have.

Yours sincerely,

Tim Bettany-Simmons MRTPI
Area Planner

Tim.Bettany-Simmons@canalrivertrust.org.uk

<https://canalrivertrust.org.uk/specialist-teams/planning-and-design>

Canal & River Trust

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North Stand Manchester

EIA Scoping Report – MCC Highways Response – 27th March, 2023

Context:

It is noted that the proposals are at a feasibility stage and the final design, mix of uses and quantum of floorspace has not yet been finalised.

A key component of the potential proposals is an expanded North Stand which could increase stadium capacity to over 60,000. An alternative design to that approved as part of the extant consent (105367/JO/2014/N2) is currently being explored, albeit it at a stadium capacity that does not exceed the approved capacity (62,170).

The feasibility study is also exploring an expanded and covered 'City Square' fan zone with associated development components including food and drink facilities (up to 3,093 sq. m), workspace, a new club shop and club museum (up to 3,505 sq. m), and a hotel (up to 15,306 sq. m).

It is stated that the proposals will be supported by a sustainable transport strategy including a Framework Travel Plan and no additional car parking is proposed at the campus as part of the proposals.

A new vehicular access route could be included from Alan Turing Way, to provide a drop-off point as required for the operation of the hotel.

A pre-application meeting was held with the Applicant and appointed Transport Consultant on 14th February, 2023 which focused on sustainable access options and scope of works associated with the Transport Assessment (TA). The EIA scope was not discussed in detail.

Traffic and Transportation - EIA Scoping Response:

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

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

Any road links that meet these criteria indicate the potential for significant effects and will be scoped into the assessment, however at this stage, the volume/distribution of development traffic for the construction and operational phases (and list of committed developments) are not yet confirmed and are subject to the outcomes of the Transport Assessment (TA) scoping.

It is therefore recognised by MCC Highways that it is not possible to determine with certainty which links could experience traffic volumes in excess of the IEMA thresholds. It is therefore proposed to scope in all of the potential environmental effects relating to Traffic and Transport into the ES and assess the magnitude of traffic increases against the IEMA thresholds at the outset of the ES Chapter.

The Scoping Report states that the assessment for the TA will focus on the impact of the commercial uses (office and hotel). As it is not proposed to increase parking provision, the volume of traffic

accessing the stadium would not increase from that already assessed/approved under previous applications. It is however requested that the EIA assesses the full development proposals (regardless of extant permissions) in order to ensure the full effects of the proposals in terms of Traffic & Transport are assessed and appropriate mitigation measures are taken forward.

Whilst the proposals will have no additional parking provision, the operational phase would still generate a number of daily vehicular trips associated with servicing/deliveries, taxis/drop-offs (utilising the potential new drop-off provision) and car trips with drivers utilising alternative nearby car-parks which should also be taken into consideration.

Highways note that other highways impacts (including multi-modal trip generation and accessibility) would be assessed further within the submitted TA, with mitigation measures where necessary and measures to promote access by sustainable modes identified within a supporting Travel Plan.

Highways would also require management and coordination of construction activities with reference to ongoing/imminent construction works in the locality within the supporting Construction Environmental Management Plan/Construction Management Plan with the cumulative effects of construction considered in terms of other construction activity occurring concurrently as part of the Traffic & Transport ES chapter.

Whilst the outline approach is accepted by MCC Highways, the following points should be taken into consideration as part of the Traffic & Transport assessment taken forward:

- Assessment should not only consider construction trip generation but also traffic redistribution impacts associated with any required traffic management/temporary road closures during the construction phase; and
- Assessment should consider any required traffic management/temporary road closure impacts on pedestrians during the construction phase.

Whilst MCC Highways accept that a number of the IEMA environmental effects would be considered within other technical assessments of the ES (including noise, vibration, visual impacts, air pollution, dust and dirt, ecological impact and heritage and conservation), appropriate traffic data should be provided to inform the associated assessments.

The following receptors have therefore been identified as having the potential to be subject to likely significant effects: severance, driver delay, pedestrian delay, pedestrian amenity, fear and intimidation and accidents and safety which is accepted by MCC Highways.

Scoping Opinion - Etihad expansion

Laura Miller [REDACTED]

Tue 04/04/2023 10:09

To: Jennifer Atkinson <jennifer.atkinson@manchester.gov.uk>

Hi Jennifer,

I have read through the scoping report and agree with their recommendation to scope in Ground Conditions, Air Quality and Noise & Vibration, as well as their proposals for further investigation as part of the planning application.

Kind Regards

Laura

Laura Miller (MRes, MA, BSc(Hons))

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

Environmental Protection Officer
Environmental Protection Section
Environmental Health
Neighbourhoods Directorate
Manchester City Council

email: [REDACTED]

website: www.manchester.gov.uk

Telephone: [REDACTED]

Internal: [REDACTED]

We are now on Twitter, for latest news and updates follow us [@EnvHealthMcr](https://twitter.com/EnvHealthMcr)

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RE: EIA Scoping Request - Etihad North Stand

Westley Robinson [REDACTED]

Wed 08/03/2023 15:13

To: Jennifer Atkinson <jennifer.atkinson@manchester.gov.uk>

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)."

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:** 08 March 2023 14:50**To:** Westley Robinson [REDACTED]**Subject:** Fw: EIA Scoping Request - Etihad North Stand

Kind Regards

Work and Skills Team
Growth and Development Directorate
Manchester City Council
Town Hall Extension, Albert Square,
Manchester, PO Box 532,
M60 2LA

Sign up for The Work and Skills Bulletin here <https://public.govdelivery.com/accounts/UKMANCHESTER/signup/19569>

For the latest support and information about the coronavirus visit
<https://secure.manchester.gov.uk/info/500361/coronavirus>

Direct Number - [REDACTED]
Follow us on Twitter- @MCCWorkSkills
Email: [REDACTED]
Web: <http://www.manchester.gov.uk>

From: Planning <Planning@manchester.gov.uk>
Sent: 08 March 2023 12:45
To: Jennifer Atkinson <jennifer.atkinson@manchester.gov.uk>
Subject: Re: EIA Scoping Request - Etihad North Stand

Further to the email below, an alternative link to the document that is open to access for people inside MCC -  [FINAL Project NS - EIA Screening Scoping .pdf](#)

Regards
Anthony
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: 0161 234 4516

Please consider the environment before printing an e-mail.

From: Planning <Planning@manchester.gov.uk>
Sent: 08 March 2023 12:24
To: Jennifer Atkinson <jennifer.atkinson@manchester.gov.uk>
Subject: EIA Scoping Request - Etihad North Stand

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

Etihad North Stand

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.

 [FINAL Project NS - EIA Screening Scoping .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 29 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: 0161 234 4516

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RE: EIA Scoping Request - Etihad North Stand

Diane Jackson [REDACTED]

Mon 13/03/2023 09:14

To: Planning <Planning@manchester.gov.uk>; Jennifer Atkinson <jennifer.atkinson@manchester.gov.uk>

Hi Jennifer,

Thank you for consulting with the aerodrome safeguarding authority about the proposed Etihad North Stand development.

We recently carried out a pre-app assessment for the developer and concluded that we would have no objections to the development.

We did draw attention to the procedures for crane and tall equipment notifications, please see:

<https://www.caa.co.uk/Commercial-industry/Airspace/Event-and-obstacle-notification/Crane-notification/>

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 <Planning@manchester.gov.uk>**Sent:** 08 March 2023 12:21**To:** Jennifer Atkinson <jennifer.atkinson@manchester.gov.uk>**Subject:** EIA Scoping Request - Etihad North Stand**The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended) (the "EIA" Regulations) - Request for Scoping Opinion****Etihad North Stand**

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, which sets out what they believe the scope of the Environmental Impact Assessment (EIA) should be, can be downloaded from the following link: <https://we.tl/t-q1MISAKR4w>

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 29 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: 0161 234 4516

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Limited, a private limited company, registered in England under Company Number 02078271, with the Registered Office at East Midlands Airport, Pathfinder House, Castle Donington, Derby, East Midlands, DE74 2SA; Manchester Airport Group US Holdings Inc, 100 N LaSalle St, Suite 900, Chicago, IL 60602.

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