

15 December 2022

Planning Department
Manchester City Council
Town Hall
Albert Square
Manchester
M60 2LA

FAO Jennifer Atkinson

Dear Jennifer,

Site Improvement Works, Etihad Stadium Application for Full Planning Permission

Introduction

On behalf of the applicant, Manchester City Football Club, please find enclosed an application for Full Planning Permission for Site Improvement works adjacent to the Etihad Stadium North Stand and adjoining land. The extent of the proposed works is shown on the enclosed red line application drawing and at Figure 1 overleaf, within this letter.

The site improvement works are required in order to validate previous remediation activity on the site and ensure that any outstanding risks associated with the historic coal mining activity have been identified and fully addressed. The works have been scoped and planned in accordance with the Ciria Guide C758D Abandoned Mine Working Manual. Initially, the proposals will therefore involve a process of site investigation and validation, undertaken by probing at regular intervals. Where required and depending on the site conditions identified in the initial investigation, a process of grouting will then be undertaken across a radial grid of between 3m and 6m and to an assumed depth of 30m.

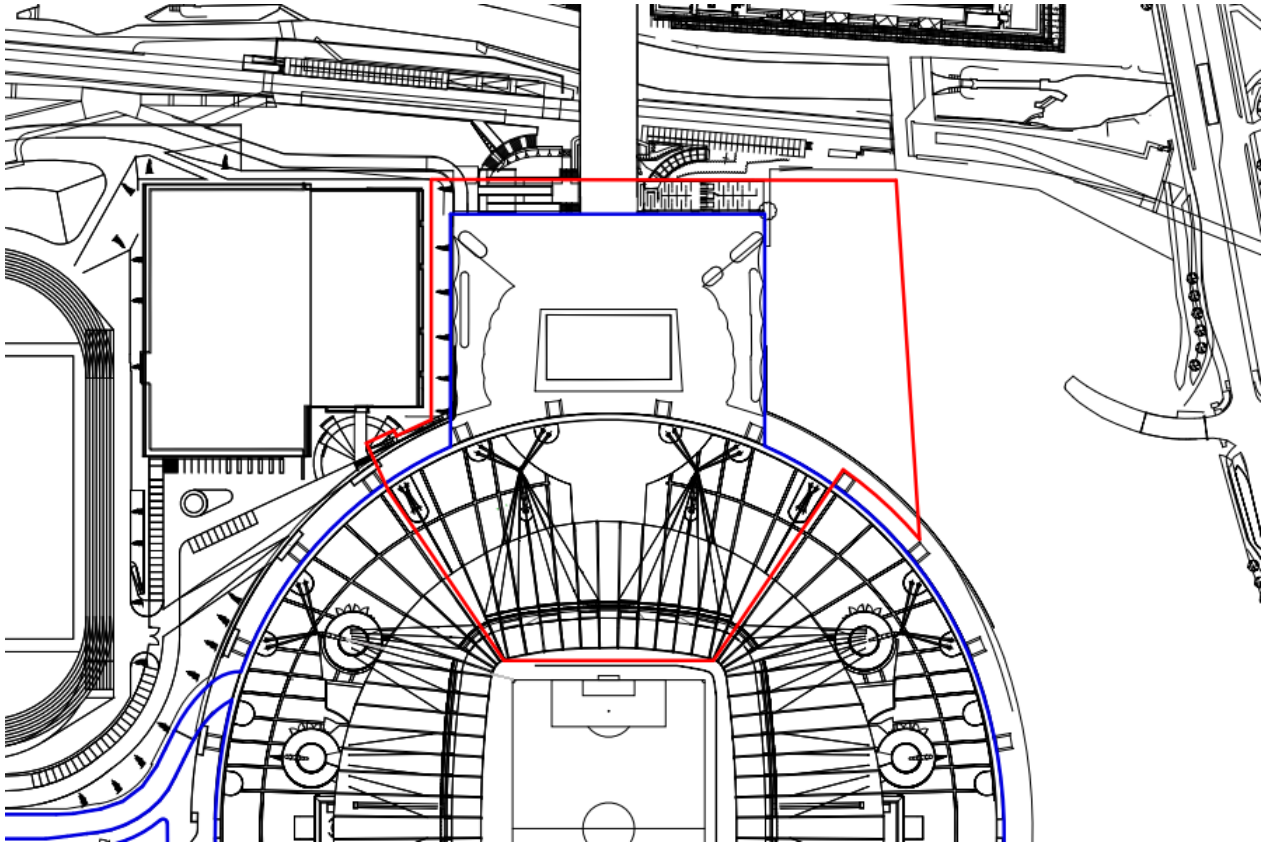
The proposals also include the decommissioning of an existing substation and diversion of existing services and drainage provisions. They will also include the careful removal of existing structures, including the existing Club Shop, and will also temporarily affect the fan zone with canopies and F&B provision, in order to facilitate the site improvement works. Temporary works are also proposed to be put in place to maintain safe access around the work area and to all Campus venues whilst the site improvement works take place. Proposals for a replacement Club Shop will be brought forward via a separate submission.

Against this context, the remainder of this letter further explains the proposals in context and assesses them relative to the development plan and other material considerations, in accordance with the requirements of Section 38(6) of the Planning and Compulsory Purchase Act 2004. We also addresses the requirements of the 2017 EIA Regulations in respect of EIA Screening of the Proposed Development.

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Figure 1: Site Location Plan (Source: Populous, 2022) with the Etihad Stadium in middle top of the image, Joe Mercer Way extending middle tip and Alan Turing Way to the right of the plan.



Application Context

The application proposals sit within the context of a longstanding programme of works to regenerate this part of Manchester over the last 30 years and will continue to process of improving this part of the City.

This is all consistent with both the well established Eastlands Vision and builds on the significant investments in the area over this time.

Eastlands Vision

Since the Commonwealth Games in 2002, the broad vision for Eastlands has remained consistent for decades – to become an attractive place for people to live, work and visit – to benefit the local population and the city-wide and regional economy.

Manchester City Council, through successive Regeneration Frameworks, has identified the Etihad Campus as the place to drive forward Eastlands regeneration via a globally competitive sport, leisure and recreation offer.

Since 2008, City Football Group and partners have overseen over £700m of investment into the Etihad Campus and East Manchester:

- The Etihad Stadium's occupation by Manchester City Football Club and the subsequent investment in its training facilities and south stand expansion strengthened the footballing anchor of the Etihad Campus.
- The City Football Academy transformed 80 acres of reclaimed land into the world's leading training ground and expanded the Etihad Campus.
- Significant progress around the focus on sport has also been made, including the development of the Beswick Hub and the Manchester Institute of Health & Performance, and an increasing collection of National Governing Bodies of Sport, with Rugby Football League recently relocating its headquarters to the Etihad Campus.
- Co-op Live, current under construction, will see the UK's biggest and most sustainable indoor arena opening on the Etihad Campus in approximately twelve months.

This investment and the broad range of participants have enabled the Etihad Campus to become a primary economic driver and anchor for significant regeneration that has taken place across East Manchester.

Today, the Etihad Campus is no longer just the home for one of the most successful global football brands. It has become a beacon of community achievement and development and an economic engine for Manchester for the benefit of the wider region and nationally. Local people, alongside elite athletes, develop their sporting skills, receive care, and innovate in some of the best facilities in the world. The community has access to new education, leisure facilities, and other public services around the Etihad Campus. Crucially, it is a place where all residents can share in the area's long-term success.

Around the Etihad Campus, new local leisure and educational developments are part of an integrated approach to the area's transformation, which has supported approximately 14,000 jobs since 2008.

Today, the Etihad Campus has the capacity and momentum to respond to and host significant new opportunities for a globally competitive leisure and recreation offer. In accordance with the long-held vision for Eastlands, this offer can advance the vision for the Etihad Campus, create sustained employment opportunities for the local community, and deliver against recognised regeneration priorities

Site's Immediate Context

The Site is bound by Joe Mercer Way and the Etihad Campus tram stop to the north and associated fan queue zones. The Metrolink stop is on the Ashton-under-Lyne to Eccles/MediaCityUK Metrolink line.

Beyond this and 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 in the other (eastwards) direction.

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 are located further to the north-west of the Site, beyond the Ashton Canal.

A large surface car park for the Etihad Campus occupies the land to the north between the former gasholder and Sportcity Way, which provides access to Alan Turing Way. An additional gasholder is located further west of the Site and the railway line. Beyond the gasholder to the north, the raised railway line acts to separate the residential neighbourhood in Miles Platting from the Etihad Campus and also the industrial uses to the east of Alan Turing Way and north of Philip's Park cemetery.

Given the nature of the former use of these gasholders and as they will not be brought back into active use in the future, the two associated Control of Major Accident Hazards Regulations (COMAH) zones, associated with the gasholders have been removed following confirmation from the Secretary of State.

The National Squash Centre borders the Site to the west. Beyond this is the Manchester Regional Arena, with the railway line segregating this from the industrial estate further to the west.

The area to the east of the Site comprises a surface car park and construction compound associated with the construction of Co-op Live. Alan Turing Way provides a hard border to the Etihad Campus to the east and comprises a four-lane boulevard with segregated cycle lanes.

To the east of Alan Turing Way are two nine storey residential apartment buildings, with a number of two-storey residential properties located beyond this in Clayton. The Eastlands District Centre is located further to the south-east, adding a positive contrast to and supporting the clusters of sports and entertainment facilities in this area.

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.

The Site is restricted to the south by the Etihad Stadium. Ashton New Road bounds the wider Etihad Campus to the south, with the area beyond this comprising a number of residential properties in Bradford and Beswick.

The Site is located within Ancoats and Beswick Ward. Clayton and Openshaw Ward is located to the east of the Site along Alan Turing Way, whilst Miles Platting and Newton Heath Ward is located circa 400m to the north of the Site.

Coal Mining Risk and Relevant Planning History

A Coal Mining Risk Assessment (CMRA) has been prepared by Buro Happold for the Site.

The CMRA identifies that the Etihad Campus is located within the Central Manchester Coalfield (CMC) and has a long history of coal mining. Early mine workings date as far back as the 1590s, where shallow coal was extracted from thin seams via a method known as 'bell pits.'

There are several coal seams that sub-crop across the Etihad Campus area, including Openshaw Mine, Charlotte Mine, Three Quarters Mine and Bradford Four-foot Mine. The Site is also indicated to lie within an area where coal deposits have been worked at shallow depth in the past but for which no plans exist.

The Etihad Campus has been subject to coal mining mitigation in the form of site investigation and grouting works in the past. A Mining Treatment Plan is appended to the CMRA and provides further information to provide context to the text below.

In January 1999, Planning Permission Ref. 055791/VO/NORTH2/98 approved enabling works including the grouting of coal seams, mineshaft capping and trial piling prior to the Stadium's original construction.

Subsequently, in 2000 and as part of the Stadium development, grout works were concentrated around the Charlotte Coals and the Openshaw seams, which comprised a 6m grout grid pattern reducing locally to 3m in areas. It is assumed that the grid pattern was locally reduced to 3m as a result of increased grout take suggesting the potential for voids having been encountered in these areas.

In 2002, Van Elle then completed grout treatment works to the southeast of the Stadium, targeting the Charlotte lower leaf and Charlotte upper leaf.

A further programme of investigation and remediation was undertaken in 2010 under Planning Permission Ref. 092380/FO/2010/N2 for works including the removal of underground structures, processing and treatment of excavated material and site works including installation of water attenuation tanks, archaeological works, new boundary fencing and demolition of the existing visitors' centre.

The coal mining validation and treatment works undertaken in 2010 are shown on the Mining Treatment Areas Plan appended to the CMRA and are summarised below:

- Validation Area D: This was completed to validate the area covered by Van Elle, an area of approximately 900m² located to the southeast of the Stadium, targeting the Charlotte seams. There were a total of 9 holes on a 12m grid to depths of 30m. Each hole was backfilled with grout upon completion of drilling. It was concluded that no voids remain in Validation Area D and the area has been sufficiently treated.
- Treatment Area D: Located to the southeast of the Stadium, targeting the Charlotte seams. Twelve holes within the grid were subject to grouting treatment.
- Treatment Area E: Located to the south of the Stadium, targeting the Openshaw Coal seams. The work involved drilling and grouting 140 holes on a primary 6m grid to a depth of 30m to 33m.

The 2010 investigations were unable to identify Shaft H as shown on drawing ref. ETC-BHE-ZX-XX-DR-YG-1001 appended to the CMRA.

An application for engineering works to facilitate diversion of services around the Etihad Stadium including associated site preparation works and erection of a 2.4 metre high fence was then approved in January 2014 (Ref. 104318/FO/2013/N2).

Shortly after, an application for the expansion of the Etihad Stadium was approved in February 2014 (Ref. 104315/FO/2013/N2), as follows:

104315/FO/2013/N2: alterations to the Etihad Stadium, including increasing the overall height of the South and North stands and associated elevational alterations, to allow an increase to each stand capacity by up to 6,250 seats respectively and up to 2,000 additional pitch side seats creating a total match day capacity of up to 62,170 seats (from 47,670), expansions of concourse facilities, alteration to public realm including changes to car parking layout, landscaping and boundary treatments and associated infrastructure works

CCG subsequently completed some ground investigation in 2020, where Made Ground was encountered to a depth of 42m below ground level; however, the investigations indicated the potential presence of a mine shaft. As detailed in the CMRA, the zone of influence surrounding Shaft H encroaches onto the Site.

The potential presence of unknown structures (between mid-1800s and mid-1900s) cannot therefore be discounted at this stage. Historical ground investigation data to the northeast/east and west of the Site evidence several occurrences of voids within a broad depth of between 33m-65m below ground level.

Extensive grouting treatment has taken place across the southwest of the Etihad Campus associated with the Stadium construction. Other grouting has taken place to the north associated with the Metrolink construction. There has been no evidence of subsequent subsidence post-treatment, concluding grouting treatment has been successful across these areas. Validation of the grout works on site has therefore, nevertheless, been recommended.

The area to the north and northeast of the site has not been subject to grout treatment work. Further investigation is therefore required to determine the need for, and scope of further grout treatment works in these areas and to identify Shaft H as shown on drawing ref. ETC-BHE-ZX-XX-DR-YG-1001 appended to the CMRA.

Please refer to drawing ETC-BHE-ZX-XX-DR-YG-1003 appended to the CMRA to see the extent of the grout treatment work.

Ground Conditions and UXO

The Etihad Campus has also been subject to ongoing works for the remediation of contamination as part of the ongoing process of regeneration and renewal.

As part of the Etihad Stadium expansion application approved in February 2014 (Ref. 104315/FO/2013/N2), an assessment of the impacts on ground conditions was undertaken and presented within Geotechnical and Geo-environmental Desk Study Reports. The reports concluded that the site has been well characterised by numerous previous investigations and has been subject to remediation (both contamination and geotechnical related) prior to the stadium's original construction. As such, it is unlikely that ground conditions other than those already identified would be encountered. It also states that prior to construction of the original stadium, contamination works were undertaken which improved the ground conditions both from a contamination and geotechnical standpoint.

Condition 16 of Planning Permission Ref. 104315/FO/2013/N2 therefore stipulated that prior to the submission of a detailed preliminary risk assessment and remediation strategy, a watching brief should be maintained on commencement of the development. Within two months of commencement of the development a report (the Preliminary Risk Assessment) to identify and evaluate all potential sources and impacts of any ground contamination, groundwater contamination and/or ground gas relevant to the site then needs to be submitted to and approved in writing by the City Council as local planning authority.

Buro Happold subsequently prepared a preliminary Risk Assessment in 2014 and submitted against Condition 16 which was subsequently discharged.

A Ground Engineering Desk Study has now been prepared by Buro Happold which seeks to establish the environmental, geological, hydrological and hydrogeological conditions present at the site that may result in potential contamination risks in connection with any proposals for the future expansion of the facilities

current provided on the site. Table 1 below provides a summary of the potential risks identified in the Report associated with ground conditions.

Table 1: Summary of Potential Ground Conditions Risks (Buro Happold, 2022)

Receptor	Source	Potential Risk
Investigation and construction workers	Made Ground on site and within the surrounding area Infilled land / Coal Measures / Made Ground [Hazardous ground gas and mine gas]	Moderate / Low
Future Site users / visitors (guests and maintenance)	Infilled land / Coal Measures / Made Ground [Hazardous ground gas and mine gas]	
Buildings/services - permeation of water supply pipework, degradation of concrete	Made Ground on Site and within the surrounding area	

The risks associated with UXO (Unexploded Ordinance) for the development had initially been assessed as Moderate. Accordingly, a detailed UXO Assessment has been completed by 6 Alpha Associates, the conclusion of which is that the Site is at Low risk from UXO.

A Ground Investigation Report is in the process of being completed. The report would include recommendations on the need for and scope of any remediation. A Groundwater Risk Assessment will also be prepared and provided to Manchester City Council in good time during the determination of the planning application.

Table 2 below highlights those documents to be prepared and submitted during the determination period.

Other Relevant Planning History

Temporary Planning Permission was granted in January 2022 for 34 catering/retail/activation units around the ring road of the Etihad stadium, as well as in the City Square area to the North of the stadium, for a period of 5 years (Ref. 132161/FO/2021).

The Site is also subject to a number of further temporary planning permissions as follows:

- **109476/FO/2015/N2** | Installation of 8 single storey catering units around the perimeter of the Etihad Stadium for a temporary period of 3 years.
- **093509/FO/2010/N2** | Creation of a 'fan zone' for Sportcity events and football matches in the form of access, public realm, lighting and environmental improvement works to the City Of Manchester Stadiums northern gateway along Joe Mercer Way, including the construction of new canopies, a gateway feature, resurfacing the area along Joe Mercer Way and around city store,

means of enclosure for licensing areas, new toilet facilities, the installation of three outdoor TV screens and the relocation of existing car parking spaces.

- **092547/FO/2010/N2** | Creation of "Fan Zone" for Sportcity events and football matches in the form of a Market Place to be called "City Street" to include various stalls and 3 metre high wind break.

These temporary permissions have now expired and will be dismantled under the site improvement proposals in accordance with conditionality of those consents.

It is anticipated that the structures will be dismantled using a wheeled excavator (so as not to damage the existing Macadam surface) with a mechanical jaw attachment. Alternatively, in the event that the structures are to be maintained in good condition for re-use, they will be dismantled utilising craneage and man access equipment.

The removal of these structures are not anticipated to produce excessive levels of dust during dismantling, and as such damping down is not envisaged. Nor is it anticipated that excessive noise levels will be generated, but both will be closely monitored and addressed as required if the need arises.

All structures have been built relatively recently and as such asbestos or asbestos related products will not be present following their use being made prohibitive prior to this development taking place.

The proposed temporary works to the Etihad Stadium tram stop queue zones also do not fall within the remit of requiring planning permission.

The Proposals

The proposed description of development as shown on the Application Form is as follows:

"Full planning permission for site improvement works comprising (1) site investigation and remediation activity in respect of historic coal mining activity, including trial piling and grouting of coal seams (2) demolition of the club shop (3) service and drainage diversions and (4) associated temporary works to maintain safe access around the stadium."

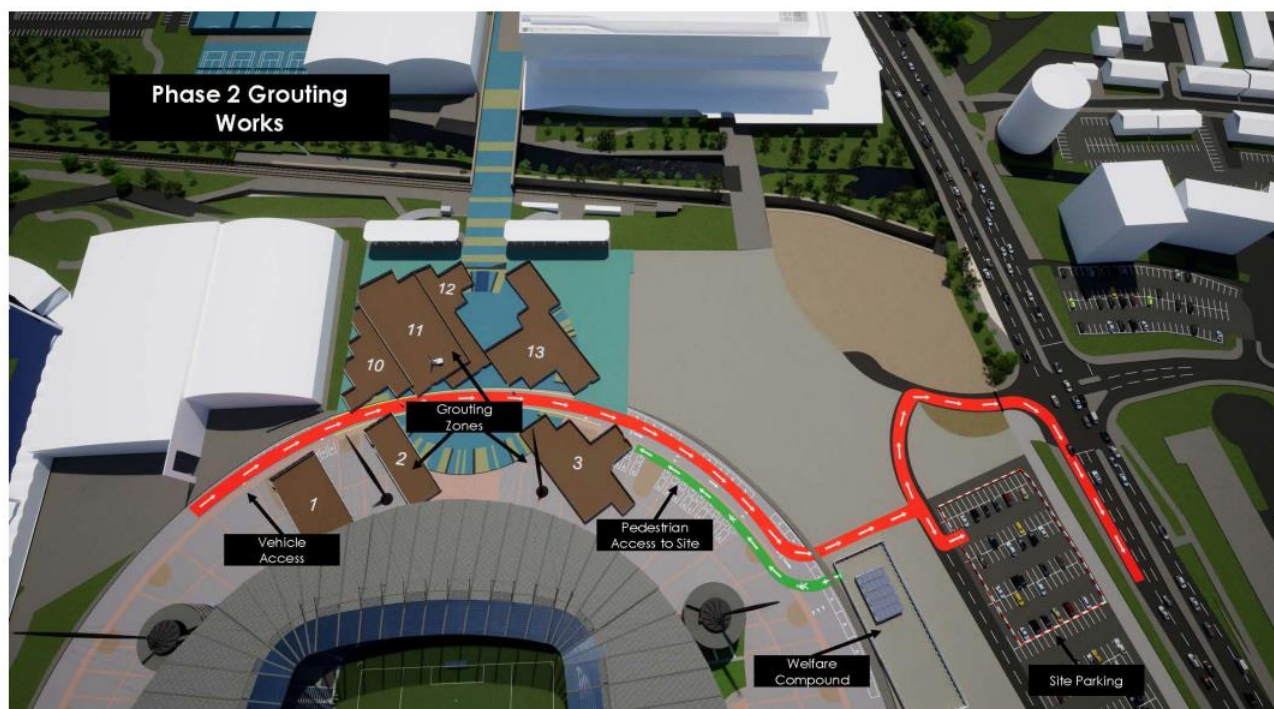
(1) Site investigation and remediation activity

The probing and grouting works have been designed in accordance with Ciria Guide C758D "Abandoned Mine Working Manual" and include the following activities:

- Further investigation to locate or prove the absence of any suspected shafts and/or voids within the shallow seams beneath the Site.
- Identification of suitable location for any future required piling.
- Targeted grouting to stabilise the ground and infill any suspected shafts and/or voids.

The mine grouting works will follow a zonal approach, on either a 6m or 3m grid – to a total depth expected to be in the region of 30m. The area subject to grouting works and the phasing of grouting activity are shown in Figure 2 below.

Figure 2: Grouting Works Area and Phasing



A grouting plant will be established, consisting of a material silo, water silo, mixing units and pumping units. Delivery of the plant and equipment will be scheduled to reduce the traffic impact on the area. A small handling crane will be used to remove the plant from the transport vehicle.

The grouting works will be conducted using a mini-piling rig which will drill bore holes to infill the ground with the Grout mixture. Grout will be pumped from a holding tank through to multiple grout hoses which will then fill the predrilled bore hole.

Once grouting works are complete to the relevant zonal area, the surface will then be made good to provide an appropriate walking surface.

This planning application seeks approval for the widest possible scope of activity to fully remediate the Site; however, it is possible once the initial probing investigation is completed that the extent of grouting can be refined and reduced.

The project team proposes to engage in on-going dialogue with the Coal Mining Authority, including through submission of the relevant application for a Coal Mining Permit, to ensure that the scope of works is sufficient to adequately remediate the Site for any planned future development. This would be captured through the use of an appropriately worded planning condition requiring the submission of a Verification Report and the Contractors Foundation Works Risk Assessment.

To facilitate the proposed works, welfare and office facilities will be provided on-site for 20 site operatives and four supervisors / project managers on an area of the Etihad Campus to the south of the Site; this is the area that has been identified within the Detailed Construction Management Plan (CMP) submitted in support of the planning application.

(2) Removal of Existing Structures

The Proposed Development also includes for the demolition of the existing two-storey Manchester City Club Shop as this is located where site investigation and remediation activity is proposed to be.

The existing club shop structure currently houses an electrical transformer that feeds the adjacent structures which all form part of the demolition/removal scope. This transformer also forms part of the network that feeds the National Squash Centre, therefore, requiring the feed to be redirected prior to disconnecting the transformer. This will ensure power is maintained to the National Squash Centre..

Once service isolation has been demonstrated and proven to be safe, with the relevant permits issued, the soft strip of the facility will be carried out. This will include all fixtures, fittings and similar. This will also include the removal of the existing transformer facility which currently feeds the adjacent structures which all form part of the demolition scope.

The building rises only to two storeys and upon satisfactory completion of the soft strip, it will be dismantled utilising a wheeled excavator with mechanical jaw attachment. In a similar manner to the other structures the production of dust or excessive noise is not anticipated but will be closely monitored. All materials will be segregated during the demolition works and removed for recycling wherever possible.

To ensure unobstructed access, should it be required by the club in the future, all foundations will be removed, and voids backfilled. The surface finish will then be applied, and the surface made good to provide safe walking routes. It is anticipated that an excavator with 'pecker' attachment may be required. This is a relatively noisy operation and will be carried out at a time agreed with the club to minimise disruption, albeit within normal working hours, to avoid disruption to members of the public.

(3) Service and Drainage Diversions

A recent Ground Penetrating Radar Survey (GPRS), and ground investigation trenches have verified that several services and drainage runs will need to be diverted. These include:

- Foul and Surface water drainage
- Gas
- Electric
- Water
- Communications

Following agreement with the provider, the services will be located, utilising existing GPRS information, Cat and Genie, and localised excavation by either hand or Vac-Ex. This will include earth works support if deemed necessary following a temporary works review.

New routes will be excavated, new services installed and backfilled, allowing the completion of the relevant connection of each diverted service. The works will also include installation of appropriate wearing surface to provide safe access once the routes are reopened.

(4) Temporary Works

A series of associated temporary works are required to maintain safe access around the work area and to all Campus venues. This includes alterations to the Etihad Stadium Metrolink queuing zones to ensure safe access to the Metrolink stop and safe queuing during the works. The principles have been established with TfGM and KAM for these alterations. Further dialogue will continue to ensure TfGM / KAM approval to detailed arrangements.

Hoarding will be erected around the Site, which will enable safe pedestrian routes through the Campus in each direction. A temporary platform to facilitate safe pedestrian and emergency vehicle circulation is required over a section of land within the National Squash Centre boundary. Discussions have commenced with MCC, as owners of this facility to agree arrangements for this platform. Further dialogue will continue to ensure MCC approval to detailed arrangement.. The hoarding will firstly be erected for Phase 1 of the site improvement and potential remediation works. Once these works are complete it will be deconstructed and relocated for the Phase 2 works and deconstructed again once these works complete and the Site has been made-good.

A temporary construction compound is proposed to the surface car park to the east of the Etihad Stadium alongside site parking as shown in the Detailed CMP, prepared by Laing O'Rourke and submitted in support of this planning application.

Pre-Application Consultation

The proposals have been the subject of pre-application consultation with the Local Planning Authority and MCC Environmental Health Officer (EHO). Buro Happold has also consulted with the Environment Agency (EA) to outline the proposals and to also establish the need for a Groundwater Risk Assessment.

The contractor will continue dialogue with the Coal Mining Authority through the Coal Mining Permit process, which is due to commence imminently.

A meeting with Ward Councillors was held on 5 December 2022. Information was provided about the proposed site improvement works, as part of that discussion.

Environmental Impact Assessment (EIA) Screening

The EIA process is the mechanism by which development proposals are appraised in terms of environmental criteria, in addition to socio-economic, engineering and technical considerations. The EIA process defines the context of the Proposed Development and examines the issues considered pertinent.

The purpose of the EIA is to establish the nature of the development and the environment on which it is likely to take place to identify likely significant effects on the environment that may arise, by comparing the existing situation at the start of the work (baseline) with the situation once the proposals are in place.

The need for a Screening Opinion has been considered in light of:

- The requirements of the Town and Country Planning (England) (Environmental Impact Assessment) Regulations 2017 (the “EIA Regulations”); and
- National Planning Practice Guidance (May 2020).

In order to determine whether the proposals require formal EIA, regard must be had to the EIA Regulations.

Where a Proposed Development falls within one of the descriptions contained in Schedule 2 of the EIA Regulations, it is prudent to obtain a ‘Screening Opinion’ from the Local Planning Authority to determine whether the Proposed Development is EIA development. This is defined as a development likely to have significant effects on the environment by virtue of factors such as its nature, size or location.

In deciding whether a Schedule 2 development is an EIA development, i.e. it is likely to have significant effects on the environment by virtue of factors such as its nature, size, or location, Regulation 4(6) provides as follows:

"Where a local planning authority ... has to decide under these Regulations whether Schedule 2 development is EIA development the authority ... shall take into account in making that decision such of the selection criteria set out in Schedule 3 as are relevant to the development."

The selection criteria specified in paragraphs 1 to 3 of Schedule 3 of the EIA Regulations refer respectively to the characteristics of the development, the location of the development, and the characteristics of the potential impact. Paragraph 1 provides that the characteristics of the development must be considered having regarded a number of matters.

Paragraph 2, dealing with the location of the development, specifies a number of matters which have to be considered in relation to the environmental sensitivity of geographical areas likely to be affected by the development.

Paragraph 3, dealing with the characteristics of the potential impact, provides that the potential significant effects of the development must be considered having regard to a number of matters.

Screening Assessment

Introduction

In determining whether the Proposed Development constitutes EIA development, the following questions must be answered in accordance with the EIA Regulations 2017 and National Planning Practice Guidance:

- Is the Proposed Development of a type listed in Schedule 1?
- If not, is it listed in Schedule 2?
- If so, is it of more than local significance, located in an environmentally sensitive area or likely to give rise to unusually complex and potentially hazardous effects?
- And/or does it meet any of the relevant thresholds and criteria set out in Schedule 2?

Schedule 1 Projects

EIA is mandatory for projects listed in Schedule 1 of the EIA Regulations. The Proposed Development is not of a type listed in Schedule 1.

Schedule 2 Projects

The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 require that any Proposed Development falling within the description of a 'Schedule 2 development' within the meaning of the Regulations, will be subject to an EIA where such development is likely to have 'significant' effects on the environment by virtue of such factors as its nature, size or location (Regulation 4(2)).

The proposals are for site investigations and remediation works, associated with historic coal mining activity at the Site, would not result in development of a greater scale than the existing use as a hard landscaped area and fan zone, and as such do not fall within any of the Schedule 2 categories of development. Therefore, it is not considered that an EIA is required in support of this planning application.

In addition, for the reasons set out below, it is not considered that the proposals would give rise to significant environmental effects.

Site Specific Planning Considerations

Given the nature of the proposals, it is clearly evidence that there would be no potentially significant environmental effects related to Townscape and Visual Impact, Wind, Daylight/Sunlight – either during the process of undertaking the site improvement works or post completion. This is given that there are no above ground structures proposed as part of these works. With regard to traffic and transportation, waste and climate change, the proposals will be supported by a Detailed Construction Management Plan which will detail how the Proposed Development will be managed and mitigated.

Archaeology

The wider East Manchester area has been subject to a series of archaeological desk-based assessments and investigative work dating back to 2000, in support of the ongoing regeneration of the area.

As part of the 2013 application to extend the Etihad Stadium, an Archaeological Desk Top Assessment was prepared by Oxford Archaeology, and subsequently a watching brief was in place during the remediation of the Etihad Stadium expansion site. During these remediation works it was found that a few sites are considered to be of local, or even borough importance, which may merit preservation by record, should they be damaged or destroyed by future development. In particular, any buried remains of mid-nineteenth-century back-to-back dwellings situated adjacent to the North Stand would potentially be of archaeological interest, as they represent late examples of this type of domestic building in the Manchester area.

A Watching Brief, which included a Written Scheme of Investigation was subsequently submitted to Manchester City Council on the 24 January 2014, in relation to a programme of archaeological works for the expanded stadium. Implementation of the watching brief was secured by a condition attached to planning permission (Condition 18).

Engagement with Greater Manchester Archaeological Advisory Service (GMAAS) was undertaken in December 2022, where it was advised GMAAS will be seeking a watching brief to be secured via condition and for the Written Scheme of Investigation to be submitted as part of this application. The matters raised by GMAAS will be addressed accordingly.

Ground Conditions and Contamination

As previously mentioned, the Site has been well characterised by numerous previous investigations and has been subject to remediation (both contamination and geotechnical related). Nonetheless, a CMRA and a Ground Engineering Desk Study have recently been prepared by Buro Happold for the Site, which identifies the potential risks that historic coal mining activity poses to any future development of the Site and what mitigation measures are likely to be required.

As discussed earlier in this Letter, the potential presence of unknown coal mining structures (between mid-1800s and mid 1900s) cannot be discounted at this stage. Historical ground investigation data to the northeast/east and west of the Site evidence several occurrences of voids within a broad depth of between 33m-65m below ground level.

Validation of the previous grout works on Site is recommended, whilst the area to the north and northeast of the Site has not been subject to grout treatment work. Further investigation is therefore required to determine the need for, and scope of further grout treatment works in these areas.

Please refer to drawing ETC-BHE-ZX-XX-DR-YG-1003 appended to the CMRA to see the extent of the grout treatment work.

A Ground Engineering Desk Study has also been prepared by Buro Happold which seeks to establish the environmental, geological, hydrological and hydrogeological conditions present at the Site that may result in potential contamination risks for the proposed future use.

This Report identifies that during the site improvement works there is a potential for:

- construction workers to be in direct contact with potential contamination in the ground and for ingestion / inhalation of contaminated soils and dusts;
- surrounding site users / occupiers of neighbouring land to be exposed to contamination via migration of dust; and
- migration of contamination into the nearby River Medlock and Ashton Canal via mobilisation of contamination, increased rainwater infiltration and the creation of preferential pathways (e.g. drainage runs/below ground service trenches).

The impact to human health (construction workers and off site users/occupiers) will be limited by the relatively small exposure period during the site improvement works (i.e. relevant to acute rather than chronic exposure) and the adoption of standard Health and Safety precautions.

The River Medlock is located within a culvert over 170m northwest of the Site, the nearest entrance is over 300m west. Ashton Canal is located approximately 30m north, beyond the Metrolink cutting. Migration of mobilised contamination during the site improvement works with the potential to adversely impact the River Medlock and Ashton Canal is considered unlikely owing to the geological conditions (substantial thickness of low permeability Glacial Till), distance to the River Medlock, and groundwater flow direction away from the Ashton Canal (anticipated to be in a south westerly direction).

Based on the above, considering the potential pathways for ground based contamination to impact sensitive receptors, any risks will be mitigated with appropriate site investigation, assessment, design, and adaptation of good working practice.

A CMRA and Ground Engineering Desk Study are submitted in support of this planning application, whilst a Preliminary Risk Assessment is in the process of being prepared and will be used to inform a ground investigation.

The findings of the ground investigation will be assessed within a Generic Quantitative Risk Assessment (including a Groundwater Risk Assessment) and shall inform the need for and scope of a Remediation Strategy. This assessment and mitigation will all be secured through standard planning conditions and will ensure no significant effects arise as a result of the site improvement works.

On this basis, it is considered that the Proposed Development would therefore not give rise to potential significant environmental effects in respect of ground conditions and contamination.

Noise and Vibration

The site improvement works will comprise several activities, all of which are likely to generate temporary and intermittent noise and vibration to some degree. These activities include grout treatment, demolition, and service diversions. It is expected that all the works activities will take place during the daytime only.

The closest noise sensitive receptor to the works is the residential block 'The Cube' off Gibbon Street. Running between the works and the receptor is the A6010 Alan Turing Way dual carriageway, a major source of road traffic noise in the area.

The works will utilise the principle of best practicable means (BPM) to mitigate noise and vibration as far as is practicable, which will include the use of hoarding around the activities to provide a barrier to the

noise they produce, and the selection of methods that generate lower levels of noise and vibration where this is feasible.

A Noise and Vibration Assessment has been prepared by Buro Happold which assesses construction noise and vibration on the nearby sensitive receptors. It concludes that no significant effects will occur as a result of the temporary and intermittent noise and vibration from the site improvement works. The assessment is included within the application submission pack of supporting documents.

Ecology

Helen Hamilton Ecology has undertaken a site visit and assessed the impacts of the Proposed Development upon the Site and surrounding area in respect of ecology. The site visit found the Site comprises previously developed land, all of which is in current use. Habitats on site comprise buildings, hardstanding, and some localised scrub and ephemeral short perennial vegetation. A total of 35 plant species were recorded: all common and widespread and typical of such post-developed sites. No evidence of protected species was noted, and the Site was considered unsuitable for most protected and priority species. Existing buildings were assessed to have negligible potential for bats and no evidence of bird nesting was noted.

The Assessment found a single European Protected Site within 10km of the proposals – Rochdale Canal SAC. This site is too distant to be affected by proposals. No SSSI's or National Nature Reserves were located within 1km of the Site. Clayton Vale Local Nature Reserve is located 734 m to the northeast of the Site but separated by Alan Turing Way. This Site is too distant to be affected by proposals.

Ashton Canal SBI is located immediately adjacent to the Site, to the north. The nature of the Proposed Development is considered to not affect this asset. Two additional SBIs, located further away, are too distant to be affected by proposals.

Two species of bat have been recorded within the 1 km search area, with only common pipistrelle roosts known close to the Site. The nearest are both approximately 250m away and unlikely to be affected by proposals.

Other protected species recorded in the Site's immediate vicinity include peregrine and little ringed plover, but neither were recorded on the Site itself. The peregrine routinely nests elsewhere, and nesting habitats for little ringed plover are not present on Site. Other protected species occurring in the wider 1km search zone include badger, barn owl, black redstart and kingfisher.

Several Priority Species have been recorded locally but not on the Site, including mammals, invertebrates and birds. Only lapwing and linnet have records close to the Site but neither are likely to nest on the Site due to the lack of suitable habitat.

It is therefore concluded that no significant effects will occur with regards to ecology as a result of the site improvement works.

Air Quality

Local authorities are required to declare an Air Quality Management Area (AQMA) for areas where air quality objectives are not likely to be met by the relevant target date. The Greater Manchester Air Quality

Action Plan sets out the measures which will reduce air pollution within Greater Manchester's AQMAs, while supporting the region's sustainable economic growth.

Alan Turing Way located to the east of the site is located within the Greater Manchester AQMA; however, the site itself is not.

For development within the AQMA, developers are expected to take measures to minimise and mitigate the local impact of emissions from traffic generated by the development, as well as emissions created by the use of the development itself, including from Combined Heat and Power and biomass plant. When assessing the appropriateness of locations for new development the Council will consider the impacts on air quality, including cumulative impacts.

The site improvement works will comprise construction activities that may cause air quality impacts. These include demolition, trackout and earthworks activities that may give rise to emissions of construction dust and ambient pollutants. The probing and grouting activities could generate some construction related dust and debris on the Site. There is also potential for emissions associated with construction vehicles accessing the Site.

The closest air quality sensitive receptor to the works is the residential block 'The Cube' adjacent to Gibbon Street. Running between the works and the receptor is the A6010 Alan Turing Way dual carriageway, a major source of air pollution in the area.

The works should implement best practicable means to mitigate air quality impacts which should include measures specific to demolition, trackout and earthworks. A Detailed CMP has been prepared and submitted with the planning application to mitigate any potential temporary impacts to air quality including dust control measures. The Detailed CMP includes details of all the recommended mitigation measures outlined by Institute of Air Quality Management (IAQM) Guidance on the Assessment of Dust from Demolition and Construction (2014) as appropriate to the assessed level of risk, and sensitivity of the local area.

The number of vehicles accessing the Site will be minimal and for a short temporary period of time.

Therefore, with the implementation of the best practice mitigation measures outlined in IAQM Guidance secured within a Detailed CMP, the air quality impact associated with the site improvement works will not be significant.

Water Resources

The Site is situated within the Manchester, Salford and Trafford Critical Drainage Area (CDA), as designated in 2011.

It is understood that there is potential for the following effects from the Proposed Development relating to water resources, flood risk and drainage:

- Potential for dust and debris blowing into nearby waterbodies (i.e., the Ashton Canal and the River Medlock).
- Potential for accidental release of hydrocarbons and oils into the on-site drainage system or directly into nearby waterbodies (i.e., the Ashton Canal and the River Medlock).

- Potential for accidental leaks and spillages of hazardous materials migrating into the on-site drainage system or directly into nearby water bodies (i.e., the Ashton Canal and the River Medlock).
- Flood risk to site workers (human health and safety) and downstream areas during construction.
- Potential temporary effects on the surface water drainage infrastructure during diversion works.
- Potential temporary effects on potable water supply and foul water infrastructure during diversion works.

These potential effects are not considered to be complex or unusual for a scheme of this nature and will be capable of being addressed through typical mitigation measures. These will be informed through the Groundwater Risk Assessment which is to be submitted in support of the application; along with standard mitigation measures which will be contained within the detailed CMP.

Heritage

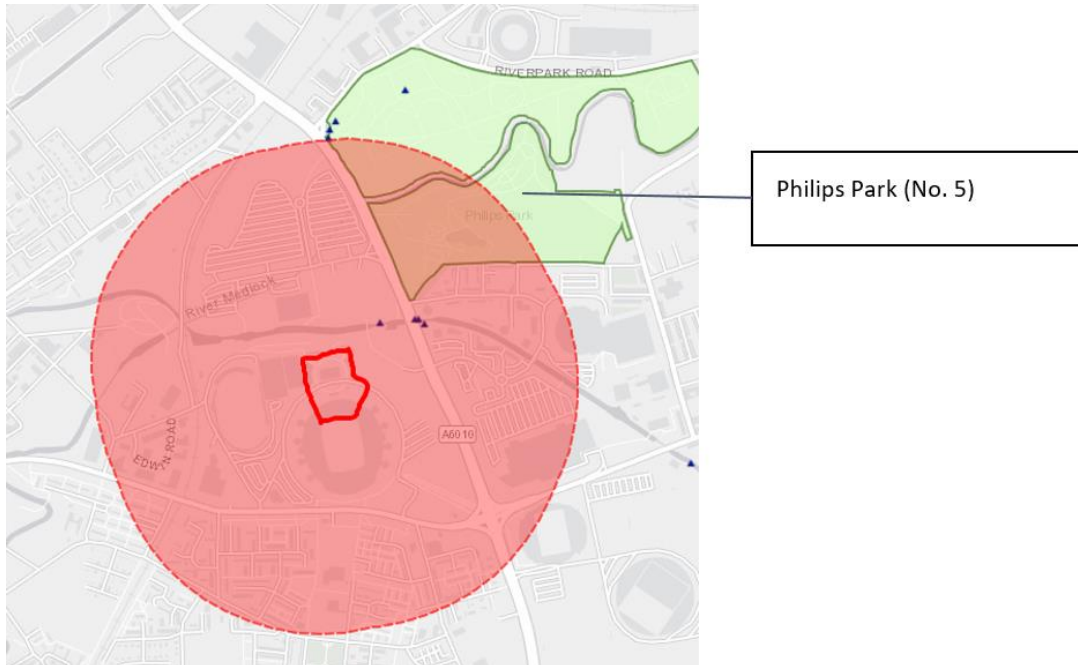
The site is not located within a Conservation Area and there are no Listed Buildings on the Site.

There are a number of listed structures within a 500 metres buffer zone as shown in Figure 1.1 below and listed underneath:

1. Ashton Canal Lock Number 6 (Grade II);
2. Ashton Canal Bridge Number 9 over Ashton Canal (Mill Street Bridge) at West End Of Lock Number 7 (Grade II);
3. Ashton Canal Lock Number 7 with Roving Bridge Immediately East of Mill Street Bridge (Grade II);
4. Ashton Canal Lock Keepers Cottage on South Side of Lock Number 7 of Ashton Canal (Grade II); and
5. Philips Park (Grade II – Park and Garden).

The nature of the proposed works, which relate primarily to below ground engineering activity and temporary construction measures, means that the setting of these heritage assets will not be permanently affected. There will be no physical impacts to the identified heritage assets as a result of the proposed works.

Figure 3: 500m approximate radius of the Site with blue triangles indicating heritage assets (Source: Historic England Map Search Tool, Accessed October 2022)



Construction Management and Traffic

It is anticipated that works will run between April 2023 and January 2024 with minimal works being completed within the concert season, or during any events held at the Etihad Stadium. The proposed construction hours on the Site are as follows:

- Monday to Friday: 07:30hrs to 18:00hrs; and
- Weekend: 08:00hrs to 14:00hrs.

Operatives are likely to arrive and depart the Site circa 30 minutes either side of these times.

The works are to be segregated from the public by means of hoarding erected around the Site. Safe access will be maintained for pedestrians between the Site and the rest of the Etihad Campus with routes created with the erection of such hoarding.

The number of vehicles accessing the Site will be minimal and for a short temporary period of time, so the impact on the local highway network will be limited. Sufficient space is available on the Site for car parking; staff will be encouraged to car share or take sustainable modes of transport.

Conclusion

The site improvement works are required in order to validate previous remediation activity on the site and ensure that any outstanding risks associated with the historic coal mining activity have been identified and fully addressed. Initially, the proposals will therefore involve a process of site investigation and validation, undertaken by probing at regular intervals. Where required and depending on the site conditions identified in the initial investigation, a process of grouting will then be undertaken across a radial grid of between 3m and 6m and to an assumed depth of 30m.

As highlighted above the technical consultants have advised the proposals are not expected to give rise to any significant environmental effects and it is considered an EIA is not required.

We would be grateful if you could provide a Screening Opinion for the Proposed Development within the statutory timescales and look forward to your response.

Planning Policy Assessment

Section 38(6) of the Planning and Compulsory Purchase Act 2004 states:

“If regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise”.

This section of the document identifies that the proposals are in accordance with, and positively contribute to, the aims of planning policy at a national and local level, including the National Planning Policy Framework and the adopted Local Development Plan.

Development Plan Documents

The key Development Plan documents relevant to this application comprise the 2012 Manchester Core Strategy and Saved Policies of the 2006 Manchester Unitary Development Plan (UDP).

Key policies are as follows:

- Core Strategy Policy EC 7 (Eastlands Strategic Employment Location)
- Core Strategy Policy SP 1 (Spatial Principles)
- Core Strategy Policy EN 18 (Contaminated Land and Ground Stability)
- Core Strategy Policy DM 1 (Development Management)
- UDP Saved Policy EM11 (Sportcity)
- UDP Development Control Policy 26 (Noise)

Policy SP 1 of the Manchester Core Strategy outlines that development in all parts of the City should reuse previously developed land wherever possible. The proposed development will facilitate the re-use of previously developed land.

Furthermore, Policy EN 18 (Contaminated Land and Ground Stability) states that the Council will give priority to the remediation of contaminated land in strategic locations as identified within this document. Also, any proposal for development of contaminated shall undertake an assessment of any associated risk to the proposed development and, if necessary, incorporate appropriate mitigation measures to address them.

In this regard, Policy EC 7 references the potential for the site's future development, stating that this location is suitable for a major sports and leisure visitor destination with complementary commercial, retail and hotels. The site improvement works, will support the future expansion of the Etihad Campus, with reference to Policy EC7.

The Site is also located at Sportcity to which Saved UDP Policy EM11 (Sportcity) relates. The Policy promotes the development of the Site for uses which will support the development of a sports/commercial cluster.

Referring back to Policy EN 18, the application is supported by a Ground Engineering Desk Study Report, prepared by Buro Happold, which establishes the environmental, geological, hydrological and hydrogeological conditions present at the site that may result in potential contamination risks / ground related risks for existing and/or potential future uses.

It is also supported by a CMRA, prepared by Buro Happold. The CMRA identifies the risks that coal mining poses to the Site, how these risks influence the development of the Site and the mitigation measures required. The proposals seek to validate earlier remediation through further site investigation and enable the completion of remediation activity to ensure that the Site is suitable for any potential future redevelopment.

Core Strategy Policy DM 1 outlines that all development should have regard to effects on amenity, including privacy, light, noise, vibration, air quality, odours, litter, vermin, birds, road safety and traffic generation.

UDP Development Control Policy 26 states that the Council will consider the effect of new development proposals which are likely to be generators of noise. Where the Council believes that a new proposal might generate potentially unacceptable levels of noise, it will require the applicant to provide an assessment of the likely impact and of the measures he proposes to deal satisfactorily with it.

A Noise and Vibration Assessment has been prepared by Buro Happold and is submitted in support of the planning application. This outlines noise thresholds for the nearest noise sensitive receptors. This Assessment includes several mitigation measures which are proposed to minimise any impact from a noise and vibration perspective.

A Detailed Construction Management Plan has also been prepared which details the proposed mitigation measures in respect of the potential noise, vibration and air quality impacts as detailed in the Site Specific Planning Considerations section above.

With regard to other material considerations, the proposals are consistent with the endorsed Eastlands Regeneration Framework which envisages the improvement and expansion of the Etihad Campus facilities, including the area around the existing stadium.

The extant planning permission from 2014, for the expansion of the south and north stand is also a relevant material consideration and have previously considered the principle of site improvement works encompassing remediation within this part of the site.

The National Planning Policy Framework also support the re-use of previously developed land and remediation activities to be undertaken to a level that is suitable for proposed future uses.

Summary

The proposed works are in accordance with the policies of the Development Plan when taken as a whole and have been assessed to be in accordance with other material considerations.

Application Documentation

The following table details the documents that are submitted in support of this application and those reports which will shortly follow during the determination period:

Table 2: Supporting Documents

Documents Submitted in December 2022	Documents to Follow During Determination
Application Form and Certificates prepared by Deloitte	Grouting Method Statement, prepared by Sub-Contractor
Location Plan, prepared by Populous	Ground Engineering Interpretive Report, prepared by Buro Happold
Existing Site Plan, prepared by Populous	Remediation Strategy, prepared by Buro Happold
Demolition Plan, prepared by Laing O'Rourke	Ground Water Risk Assessment, prepared by Buro Happold
Proposed Site Layout, prepared by Populous	
Coal Mining Risk Assessment, prepared by Buro Happold	
Detailed CMP, prepared by Laing O'Rourke	
Ground Engineering Desk Study Report, prepared by Buro Happold	
Noise and Vibration Assessment, prepared by Buro Happold	

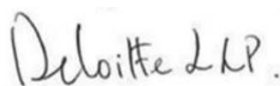
Conclusion

The application has been submitted on the Planning Portal (Ref. PP-11716210). A fee has been paid to MCC for £2,028 in addition to any administrative fees by the Planning Portal, in respect of the requisite application fee.

We trust you will find this application in order and we look forward to receiving written confirmation of its registration.

Please contact Eve Grant (0161 455 6483 / evgrant@deloitte.co.uk) or Rachel Brown (0161 455 6306 / rachebrown@deloitte.co.uk) at the earliest opportunity should you have any queries or require any further information.

Yours sincerely



Deloitte LLP