MANCHESTER
CITY COUNCIL

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28 October 2022

Our reference: JA/DMN

Dear Mr Eyre

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

SCOPING REQUEST UNDER PART 4 REGULATION 15(1)

'GREAT NORTHERN, DEANSGATE TERRACE AND LEISURE BOX REDEVELOPMENT' MANCHESTER ("THE PROPOSED DEVELOPMENT")

SCOPING OPINIONOF MANCHESTER CITY COUNCIL PURSUANT TO REGULATION 15

Thank you for your request dated 7 September 2022 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 *'Great Northern, Deansgate and Leisure Box Redevelopment - Environmental Impact Assessment Screening and Scoping Report'* prepared by yourselves, on behalf of the Applicant Trilogy Real Estate, and the comments from statutory consultees.

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

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

for an EIA and have therefore submitted the Scoping Report for consideration to the City Council, as Local Planning Authority.

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

(a) any information provided by the applicant about the proposed development;

(b) the specific characteristics of the particular development;

(c) the specific characteristics of development of the type concerned; and

(d) the environmental features likely to be significantly affected by the development.

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

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

This Scoping Opinion should not be construed as implying that the City Council, as Local Planning Authority, agrees with the conclusions set out in the Scoping Request regrading 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 7 September 2022 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

- Townscape and Visual Impact;
- Historic Environment;
- Air Quality;
- Noise and Vibration;
- Wind Microclimate;
- Sunlight, Daylight and Solar Glare;
- Socio economic;
- Human Health;
- Climate Change.

Scoped out

- Agricultural circumstances;
- Archaeology;

- Aviation;
- Ecology;
- Ground Conditions;
- Broadband connectivity;
- Telecommunications;
- Water resources; and
- Transport.

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

CONSULTATIONS

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

Having regard to Regulation 2 of the EIA Regulations, the following consultees were consulted who have specific environmental responsibilities and which the City Council, as Local Planning Authority, considers are likely to have an interest in the development proposal.

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

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

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

Any subsequent ES submitted with a planning application should reflect the points raised by the consultation bodies where this reflects the requirements of the

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

CONTEXT

The development site is approximately 3.01 hectares and is located in Manchester City Centre, adjacent to the Castlefield and St John's Strategic Regeneration Areas. The site is bounded by Deansgate to the west, Peter Street to the north, Great Bridgewater Street to the south and Watson Street to the east.

The comprises of 3 main buildings:

- Great Northern Warehouse: Grade II* Listed former goods warehouse that was converted into a car park in the 1990s on the upper floors. The ground and first floors include a casino, gym, event spaces, food and beverage operators.
- Deansgate Terrace: a Grade II Listed row of ground floor shop frontages comprising retail, food and beverage operators below office, storage and further retail space.
- Leisure Box: a cinema complex with three floors of existing car parking space below.

SENSITIVE RECEPTORS

The development site is located within the Greater Manchester Combined Air Quality Management Area (AQMA) due to its proximity to major roads within the City Centre.

The site is not within, nor does it contain, any ecological designations including sites of specific interest (SSSI), sites of biological importance (SB1) or special protection areas (SPA). The closet special area of conservation (SAC) and sites of special scientific interest (SSSI) Is the Rochdale Canal SSSI and SAC.

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

The development site is located adjacent to several Conservation Areas, including the Castlefield Conservation Area to the south west, St John Street Conservation Area to the west, and St Peter's Square Conservation Area to the north east. The northern edge of the Site falls within the Deansgate / Peter Street Conservation Area.

There are four listed assets within the development boundary:

- Great Northern Warehouse: The warehouse is Grade II* Listed, which reflects the outstanding national importance of the building, being considered, in its day, to be one of the most advanced railway goods exchanges in the country. The warehouse forms an important group with, and is an integral part of, the adjoining Grade II Listed Deansgate terrace;

- 223-233 Deansgate Terrace and 235-291 Deansgate Terrace (with Former Goods Yard Entrance): The terrace of 34 shop units is Grade II Listed in two separate parts: No's 223-233 and No's 235-291. The listed status of the terrace reflects its national importance architecturally and historically. The arched

entrance into the former goods yard at the junction of Peter Street and Deansgate falls in part within the southern boundary of the Peter Street Conservation Area.

- Manchester & Salford Junction Canal Tunnel is located underneath the site and is Grade II Listed.

There are a further 34 listed assets within 250m of the application boundary, including 34 Grade II Listed Assets and 4 Grade II* Listed Assets. The Grade II* Listed Assets comprise the Free Trade Hall to the north east, Manchester Central to the east, with the Central Library and Midland Hotel located on Peter Street to the north and east. Slightly further beyond this 250m boundary to the north, the Manchester Town Hall and Albert Memorial, are both Grade I Listed.

The development site is located in an area of significant change which includes the following developments:

- Viadux - 40-storey residential development and office building adjacent to the Deansgate-Castlefield Metrolink stop;
- Beetham Tower, a 47-storey residential and hotel building;
- Great Jackson Street and Deansgate Square, containing a cluster of the UK's towers (South Tower 64 storeys, East Tower 50 storeys, North Tower 37 storeys and West Tower 44 storeys); and
- First Street, comprising an area that now comprises a mix of commercial office and leisure buildings.

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 for Trinity Islands would consist of the renovation of the Great Northern Warehouse and conversion and alterations to the Deansgate Terrace to provide circa 221,338 sq ft of office space, 58,437 sq ft of ground floor retail and leisure uses (Use Class E) including retained areas.

The proposal would also include the redevelopment of Great Northern Square to provide new public realm and ancillary facilities along with the creation of new pedestrianised areas.

The Odeon Cinema would been demolished with the car parking retained and remodelled. 750 new apartments (available for rent) would be built in three buildings ranging for 19, 28 and 34 storeys in height.

I also note it is envisaged that 992 car parking would be created along with 1160 cycle spaces. 145,379 sq. ft of public realm would also be created.

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 industrial 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), Barton Aerodrome 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.

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.

Ground Conditions

The Scoping Report concludes that although there is evidence of previous contamination, there is nothing unusual or complex about the ground conditions at the proposed development site. As a result, there will be no significant effects which would require consideration by an EIA. I confirm that ground conditions can be scoped out of the ES provided the planning application is supported by an appropriate report which supports these conclusions.

Broadband Connectivity

The Scoping Report concludes that there would be sufficient internet services available at the proposed location given the built up nature of the local environment. I confirm that Broadband Connectivity can be scoped out of the ES provided the planning application is supported by an appropriate report which supports these conclusions.

Telecommunications

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.

Water Resources

The Scoping Report concludes that the main risk of flooding site the site would be from surface water run off and that no significant risks are likely. I can confirm that Water Resources can be scoped out of the ES provided that the planning application is supported by an appropriate report which support these conclusions.

The following details must be covered appropriately within the document including mitigation.

The proposed flood risk assessment and drainage strategy should include a description of the “Manchester & Salford Junction Canal Tunnel” asset which is indicated to be beneath the development, but its modern-day functionality is unspecified. This should also identify the asset owner, detail any consultation required, and any embedded design required to protect the asset.

Surface water management needs to follow the drainage hierarchy:

- Infiltration into ground
- Connection to the watercourse
- Connection to surface water sewer and as a last resort;
- Connection to the combined sewer.

SuDS should be designed to control surface water as close to its source as possible. Well-designed sustainable drainage systems also provide opportunities to:

- reduce the causes and impacts of flooding,
- remove pollutants from urban run-off at source,
- combine water management with green space with benefits for amenity, recreation and wildlife.

The Council is encouraging use of green roofs, green walls, tree planting and other forms of green infrastructure to allow for the adaptation to climate change in heavily urbanised area. New Green infrastructure provision should be an exemplar of best practice and innovation in terms of both its design and management.

The use of SuDS should also help achieve the sustainability objectives of the PPF.

Surface water should be managed to ensure there is no increased surface water from the proposed development and runoff from extreme events should be retained within the site such that the adjacent third party land is not affected.

Hydraulic calculations and drawings to support the design need to be provided along with proposed standards of operation and maintenance.

Transport

The Scoping Report provides a detailed account of the approach to the transport assessment, travel planning and car parking. I can confirm that Transport can be scoped out of the ES provided that the planning application supported by appropriate reports.

The following details must be covered appropriately within the document including mitigation.

The Transport Assessment should review the potential impact of the loss in spaces and reduction of publicly available car parking spaces in the city centre of Manchester.

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

As part of the previous planning application on-site parking surveys were undertaken to understand the NCP usage. The survey took place over a six-week period. It is requested that a new survey is undertaken to reflect existing conditions.

The dimension of car parking spaces, these should all accord with MCC's standard minimum requirement.

It is recommended that standard parking bay dimensions be a minimum of 2.4m x 4.8m and disabled parking bay dimensions a minimum of 3.6m x 6.0m. This should also

include a 6-metre aisle width to allow vehicles to safely manoeuvre within the car park with formal demarcation of all spaces.

It is requested that the Transport Assessment provide details of the proposed level of EV Charge to be provided for each use class and justification should be provided. It should also be ensured that ducting infrastructure is installed to allow future EVC installation. There should also be a commitment to monitoring usage within the Travel Plan and increasing the provision when necessary.

Safe and secure cycle parking should be in place for the use of staff and visitors. It is requested that the applicant review MCC Core Strategy Parking Standards and that the cycle parking spaces for each use is detailed, and justification is provided. 100% cycle parking is requested for the residential developments. 1 space should be provided per 200sqm (minimum of 2 spaces) for office use, 1 space per 20 seats (minimum of 2 spaces) for cinemas, theatres and conference facilities or 1 space per 140sqm for other leisure facilities depending on the proposed leisure use.

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

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.

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.

It should be ensured that the proposed access meets design standards and can accommodate HGV movements where necessary. Dropped kerbs and tactile paving should also be installed at the crossing point.

It is requested that the Transport Assessment demonstrate that the appropriate stopping sight distance can be achieved from the access.

A review of Traffic Regulation Orders on the surrounding streets in the vicinity of the development is required to determine if any changes are required to ensure potential overflow car parking from the development does not impact highway operation/safety.

Waste Management details should be provided for the development site within the submitted Transport Assessment. The information should include the number of collections and location of collection points.

Swept path analysis should be provided of a 11.5m refuse vehicles within the development site. The swept path should demonstrate that the refuse vehicle can enter and exit in forward gear and manoeuvre around the site safely. If the development site proposes private waste collection then it is requested that details of this are provided.

It is requested that servicing is undertaken outside of the network AM and PM peak periods. It is also requested that a Service Management Strategy is in place.

Swept path analysis should be provided for the largest expected service/delivery vehicle within the development boundary. The number of deliveries and location of the delivery points should also be provided.

For any projects that require a S278 and/or S38 highway agreement a Stage 1 Road Safety Audit (RSA 1) is requested to inform the preliminary design at the pre-planning stage - prior to planning approval being granted. This ensures that any underlying highway safety issues have been identified and mitigation is proposed accordingly. The scope and study area of the RSA1 will be agreed on a site by site basis however, as a minimum, it is expected to include the following:

5 years of accident history

- Audit of key pedestrian routes (crossing points, footway widths, condition etc.)
- Audit of key cycling routes (ASLs, cycle lanes etc.)
- Highway layout including, but not limited to (visibility assessments, speed limits, TROs, traffic calming etc.)

The CEMP should detail any impacts on the highway e.g. the phasing and quantification / classification of vehicular activity associated with planned construction, evidence (including appropriate swept-path assessment) of satisfactory routeing both within the site and on the adjacent highway, site hours, details of contractor parking, wheel wash facilities etc. Dilapidation surveys are requested, this should include photographs and commentary on the condition of carriageway / footways on construction vehicle routes surrounding the site.

Dilapidation surveys are requested, this should include photographs and commentary on the condition of carriageway / footways on construction vehicle routes surrounding the site.

This is to protect MCC and the contractors to verify (prior to construction) the condition of the carriageway.

The applicant is advised that any requirements for licensing, hoarding / scaffolding and any associated temporary traffic management arrangements will need discussion and agreement with MCC Highways Applications and Network Resilience teams via Contact Manchester (Tel. 0161 234 5004) Email - highwaylicences@manchester.gov.uk

Should there be any basement excavations proposed adjacent to the highway structural drawings and calculations for the temporary and permanent support works must be submitted for checking (for a fee) to MCC Bridges/Structures Section. The applicant is advised to contact highways.structures@manchester.gov.uk.

The document should also consider contractor parking and ongoing construction works in the locality. It is recommended that the above is conditioned and attached to any planning permission that may be granted.

A full travel plan should be provided.

S**ummary**

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 Human Health (further details provided below) 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 re-consider 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.

- Townscape and Visual Impact;
- Historic Environment;
- Air Quality;
- Noise and Vibration;
- Wind Microclimate;
- Sunlight, Daylight and Solar Glare;
- Socio economic;
- Human Health;
- Climate Change.

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 Manchester City Centre adjacent to significant regeneration areas.

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

Townscape and Visual Impact

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

Historic Environment

The comments within your Scoping Report are noted and are acceptable in terms of their consideration in the ES. Please note that the City Council has yet to received the comments of Historic England and reserves the right to comment on this in due course.

Air Quality

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

The City Council, as Local Planning Authority, recommends that the ES must take account of the following additional matters with reference to impacts on air quality.

Six months, starting June 2022, of additional diffusion tube monitoring at 11 tube locations around the site, is acceptable and should provide sufficient data to annualise it for a year. There is also a net reduction in parking spaces which is betterment compared to the current number of spaces, but the statistics on the car park use in the scoping report are out of date as they are based on 2016 data. This should be updated for the purposes of the Air Quality chapter of the ES.

A updated traffic survey is suggested in the Scoping Report and is also required in this regard.

Noise and Vibration

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

The City Council, as Local Planning Authority, recommends that the ES must take account of the following additional matters with reference to impacts on Noise and Vibration.

The noise monitoring scope/locations and approach with regards to overheating has been discussed directly with the City Council's Environmental Health Team. The noise assessment should also include construction noise and external plant in line with MCC guidance which can be found at our website.

Wind Microclimate

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

Sunlight, Daylight and Solar Glare

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

Socio economic

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

Human Health

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

Climate Change

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

FURTHER INFORMATION

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

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

Yours sincerely



Dave Roscoe

Deputy Director of Planning

Historic England

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

Direct Dial: 0161 2421442

Our ref: PL00791507

7 November 2022

Dear Ms Atkinson

Re: Great Northern, Deansgate Terrace and Leisure Box Redevelopment Environmental Impact Assessment (EIA) Scoping Report

Thank you for your letter of 24th October 2022 consulting us about the above EIA Scoping Report.

This development would have an impact on a number of designated heritage assets within the site boundary, as well as on the setting of assets within and around the site. In line with the advice in the National Planning Policy Framework (NPPF), we would expect the Environmental Statement to contain a thorough assessment of the likely effects which the proposed development might have upon those elements which contribute to the significance of these assets.

The methodology and the proposed scope of the assessment have been set out in paragraphs 5.19 to 5.25 of the EIA Scoping Report. Both appear to be appropriate. However, given the heights of the structures associated with the proposed development, it is likely to be visible across a large area and could, as a result, affect the significance of heritage assets at some distance from this site itself. We would therefore expect the assessment to clearly demonstrate that the extent of the proposed study area is of the appropriate size to ensure that all heritage assets likely to be affected by this development have been included and can be properly assessed.

It is important that the assessment is designed to ensure that all impacts are fully understood, both those which physically affect the assets and those that affect their setting. Section drawings and techniques such as photomontages can be a useful means to demonstrate the extend of these.

We would also expect the Environmental Statement to consider the potential impacts on non-designated features of historic, architectural, archaeological or artistic interest, since these can also be of national importance and make an important contribution to the character and local distinctiveness of an area and its sense of place. This information is available via the local authority Historic Environment Record (www.heritagegateway.org.uk) and relevant local authority staff.

Historic England is subject to both the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any Information held by the organisation can be requested for release under this legislation.

We would strongly recommend that you involve the Conservation Officer(s) of Manchester City Council and the archaeological staff at the Greater Manchester Archaeological Advisory Service in the development of this assessment. They are best placed to advise on: local historic environment issues and priorities; how the proposal can be tailored to avoid and minimise potential adverse impacts on the historic environment; the nature and design of any required mitigation measures; and opportunities for securing wider benefits for the future conservation and management of heritage assets.

The assessment should also take account of the potential impact which associated activities (such as construction, servicing and maintenance, and associated traffic) might have upon perceptions, understanding and appreciation of the heritage assets in the area. The assessment should also consider, where appropriate, the likelihood of alterations to drainage patterns that might lead to *in situ* decomposition or destruction of below ground archaeological remains and deposits, and can also lead to subsidence of buildings and monuments.

If you have any queries about any of the above, or would like to discuss anything further, please contact me.

Yours sincerely,

Richard Broadhead
Inspector of Historic Buildings and Areas
Richard.Broadhead@HistoricEngland.org.uk

Historic England is subject to both the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any Information held by the organisation can be requested for release under this legislation.