



MANCHESTER CITY COUNCIL

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8th July 2022

FAO Rachel Hopkins
Deloitte LLP
The Hanover Building,
Corporation Street,
Manchester,
M4 4AH

Dear Sir / Madam

**Environmental Impact Assessment Regulations, the Town and Country
Planning (EIA) (England) Regulations 2017 (as amended) (the “EIA Regulations”).**

Scoping Request Under Part 4 Regulation 15(1)

Site bounded by Newman Street (formally Brancaster Road) to the north, Sorton Street to the west, Cloak Street to the south and Princess Street to the east (Plot 12 : 3 Circle Square).

Scoping Opinion of Manchester City Council Pursuant to Regulation 15

Further to your request in respect of the above dated 30th May 2022 and subsequent e-mail dated 8th July 2022 (cumulative schemes) and attachments: CIRCLE SQUARE PLOT 12C APPENDIX 4: KEY VIEWS AND PHOTOMONTAGES and 8.1 Viewpoint Location Plan.

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 ”No.3, Circle Square – Full Planning Application Environmental Impact Assessment (EIA) Screening and Scoping Report May 2022 prepared and submitted by yourselves on behalf of the Applicant Bruntwood Circle Square 12 Ltd and 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 the applicant intends to submit with the planning application 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 organizations and bodies that responded to consultation on the Scope of the proposed ES.

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

Your report of May 2022 sets out the proposed chapters that the ES will cover, and the disciplines which you believe should be scoped out of the EIA.

These are as follows:

Scoped In

- Flood Risk and Drainage
- Sunlight, Daylight and Overshadowing
- Townscape and Visual Impact Assessment
- Wind

Scoped out

- Agricultural circumstances;

- Aviation
- Air quality;
- Archaeology;
- Historic Environment;
- Ground Conditions;
- Ecology and nature conservation;
- Electronic Interference;
- Acoustics and Vibration;
- Transport and Access;
- Solar Glare;
- Socio-Economic;
- Human Health; and
- Climate Change.

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

CONSULTATIONS

Regulation 15 (4) of the EIA Regulations require the City Council, as Local Planning Authority, to consult appropriate 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 Archeology Advisory Service (GMAAS);
- Transport for Greater Manchester (TfGM);
- City Council Highway Services;
- City Council Environmental Health;

- City Council Flood Risk Management;

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 planning application process as the development proposal evolves. It is thereby recommended all consultee responses are reviewed by 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 the applicant and should be given due consideration in the planning application process EIA process.

CONTEXT

The site is approximately 0.2 ha and lies within the wider area covered by the Circle Square SRF Masterplan and indicatively set out for an office use. The Site most recently comprised the construction compound for Sisk, the contractors developing the other plots on the Circle Square Masterplan. It is now cleared and hoarded, awaiting development.

To the south west of the Site, which also forms part of the wider Masterplan Site, is the Manchester Technology Centre (Oxford House). This building remains in active use with commercial units located on the ground floor. The 'Hatch' development is located adjacent to the Manchester Technology Centre and beneath the Mancunian Way and provides a range of flexible retail and leisure uses.

The Mancunian Way fly-over is situated along the Circle Square Masterplan southern boundary and creates a barrier between Circle Square and the main University campuses further south. To the north of the Site, on the eastern bank of the River Medlock are a number of residential apartments within Princess House and Montana House, both rising to approximately 12 storeys.

Further to the north of the Site, Charles Street has a mix of building heights and uses, including a number of public houses and bars to the eastern end, and residential uses at its junction with Oxford Road. The Grade II Listed Lass O'Gowrie pub is located north of the Site on Charles Street. Further Grade II and Grade II* Listed buildings are located further north on Princess Street and Whitworth Street West.

To the east of Princess Street boundary is the former UMIST campus, which is now known as the Sackville Street campus (or North Campus) of the University of Manchester. Princess Street bridges the River Medlock, a tributary of the River Irwell.

To the west of the Site is Oxford Road, which contains a mixture of uses and building.

There are no designated heritage assets (Scheduled Monuments, Grade I, II* and II Listed Buildings, Conservation Areas, Registered Parks and Gardens or Registered Battlefields) within the site boundary. There are a number of listed buildings in the vicinity, including

Grade II listed Lass O'Gowrie pub on Charles Street and Grade II* Palace Hotel on Oxford Road. The Grade II listed Dancehall Theatre located on Oxford Road overlooks the broader Masterplan Site from the West. The Site is not within a Conservation Area but the border of the Whitworth Street Conservation Area lies to the north of on Whitworth Street.

There are no trees located on or adjacent to the Site.

The Site is identified for redevelopment within the endorsed The Former BBC Strategic Development Framework (BBC SRF) (2013). The area which is the subject of this Scoping Opinion is located in the south eastern portion of the SRF Area.

The site lies within a highly accessible City Centre location accessible by a variety of public transport including Metrolink, bus and rail.

SENSITIVE RECEPTORS

The site is located within the Greater Manchester Combined Authority Air Quality Management Area (AQMA). 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 site is not located in an Area of Outstanding Natural Beauty (AONB) or any other area designated for its landscape value. The closest watercourse to the site is the River Medlock located adjacent to the sites northern border.

The Site, is located within Flood Zones 1 and 2 and The proposal is within 20m of a main river. The site is situated within the Manchester, Salford and Trafford Critical Drainage Area (CDA).

Vita Living Blocks 5,6,7 and 8 Century Buildings to the north west of the site is a residential building. Vita Blocks 9, 10 and 11 are serviced apartments. There are also a number of hotels within the immediate vicinity of the Site on Oxford Road, Including the Palace Hotel and the Holiday Inn Express.

PROPOSED DEVELOPMENT

The Proposed Development would involve the erection of a new 15 storey building (approx.70 m lowest ground floor level to top of lift overrun) comprising 14 floors of office (Class E) above a floors of commercial space and associated landscaping.

ASSESSMENT OF THE SCOPING REPORT

I have now had a chance to consider your scoping request alongside the consultation responses received and I outline my response below.

Overall I can confirm that the content of the submitted 'Formal Scoping Opinion Request' is considered to be appropriate and will form a generally appropriate structure for the Environmental Statement. This is also reflected in the nature of the consultation responses issued with this letter. You should note the specific points I have made below within the specific discipline areas which reflect the comments of the consultees and particularly regard must be given to these 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.

No alternatives for consideration have been detailed within the scoping report and these will have to be considered alongside an indication of the main reasons for the option chosen, including a comparison of the environmental effects within the ES.

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 in a manner which is comprehensible to the specialist and non-specialist alike. The ES should be concise with supporting technical information placed in appendices

Mitigation

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 in this manner within each of 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 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.

Cross references and summarising of the findings

All specialist chapters should be cross-referenced to other relevant disciplines (for example air quality impacts on ecology, 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 just 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 this topic area can be scoped out of the EIA.

Aviation

The overall scale of the Proposed Development does not exceed the aviation safeguarding threshold resulting in no significant effects on the aviation environment. I therefore accept that aviation can be scoped out of the ES.

Air Quality

The comments within your scoping report are noted. It is accepted that subject to an Air Quality Assessment being submitted as part of the supporting documents to the planning application to include the following details:

- An assessment for future receptors (ground floor receptors and upper floor residential) and include PM10 and PM2.5 as well as NO2.
- Assessment of fugitive dust emissions and mitigation measures during the demolition and construction phase. Reference to IAQM best practice measures shall be made and adopted through the development. Details of clean air filters should be provided where required along with their location on the building and maintenance / replacement requirements.

that Air Quality can be scoped out of the ES.

Archaeology It is noted that there are no designated heritage assets, such as listed buildings, within the Site and there are no below-ground archaeological remains that are afforded statutory protection as designated heritage assets that would require preservation in-situ. The Scoping Report notes that the Circle Square Masterplan area was subject to archaeological work between 2015 and 2016 as part of an enabling works development under application reference 109647/FO/2015/C1. The area included the Plot 12 No.3 Site. During that phase of work an archaeological evaluation was implemented which included investigations within the area of No.3.

The investigations identified no remains of archaeological significance within the area of No.3. Elsewhere remains within the wider site were identified, and mitigation works were undertaken in agreement with the Greater Manchester Archaeological Advisory Service (GMAAS).

Subsequent reports documented the archaeological work across the site, and the results have been consolidated by Pre Construct Archeology (PCA) and published within a peer reviewed journal, approved by GMAAS, in 2021. This represents the last requirement for work under archaeological planning conditions attached to the enabling works consent. These reports will be submitted in support of the planning application.

As No.3 is within a wider site which has now been sterilized of archaeology under a previous planning consent, it is accepted that archaeology can be scoped out of the EIA. An agreement to this is being sought currently with GMAAS.

Climate Change

I consider climate change (with the exception of social value) cannot be scoped out of the ES for the reasons set out below.

Ecology and nature conservation

The comments within your scoping report are noted. The site currently comprises made ground and areas of amenity grassland. There are no structures within the site footprint which had suitability to support roosting bats. Suitability for any nesting birds was also very limited. The site supports common species typical of urban and brownfield habitats. The site is currently of very low ecological value and there are no opportunities for bat roosting within the site at the time of survey.

On this basis I accept that an ecological assessment can be scoped out of the ES and can instead form part of the supporting documents to the planning application.

Notwithstanding this the following should be submitted to support the application:

- A Phase 1 Habitat Survey, which may help to inform any proposals to improve the nature conservation value of the site / area.
- A Bat survey
- Details of measures to be taken to prevent any potential impacts of the development proposal on the adjacent River Irwell.

- The Ecology Report should use an appropriate biodiversity metric such as Biodiversity Metric 3.0 together with ecological advice to calculate the change in biodiversity resulting from proposed development and demonstrate how proposals can achieve a net gain.

The metric should be used to:

- assess or audit the biodiversity unit value of land within the application area
 - calculate the losses and gains in biodiversity unit value resulting from proposed development
 - demonstrate that the required percentage biodiversity net gain will be achieved
- Biodiversity Net Gain outcomes can be achieved on site, off-site or through a combination of both. On-site provision should be considered first. Delivery should create or enhance habitats of equal or higher value. When delivering net gain, opportunities should be sought to link delivery to relevant plans or strategies e.g. Green Infrastructure Strategies or Local Nature Recovery Strategies.

Opportunities for wider environmental gains should also be considered.

It should be noted should the planning submission be delayed beyond survey season 2022 then the survey would need to be revisited.

Electronic Interference / TV and Telecommunications

The comments within your scoping report are noted. It is accepted that subject to a television, FM Radio and DAB radio reception assessment being submitted as part of the supporting documents Electronic Interference / TV and Telecommunications that Electronic Interference / TV and Telecommunications can be scoped out of the ES.

Ground conditions

The comments within your scoping report are noted. It is accepted that subject to a Phase 1 Preliminary Site Assessment (PRA) being submitted as part of the supporting documents to the planning application that ground conditions can be scoped out of the ES.

Notwithstanding the above it should be noted that site was formerly used as a church so there is the potential for a burial ground to be present, if any graves/human remains are found then the Ministry of Justice will need to be contacted.

Made ground is likely to be present due to former uses on the site including a school, church and residential. More recently the site has been used as a car park and construction compound.

Historic Environment

The Site does not contain any listed buildings or sit within a conservation area therefore there will not be any direct impacts caused any heritage assets on the Site itself. The comments within your scoping report are noted. On the basis that a Heritage Assessment is submitted with your application it is accepted that Historic Environment can be scoped out of the ES.

Human Health

The comments within your scoping report are noted. On the basis that any applicable impacts associated with Human Health will be considered within the Climate Change Chapter (see section below) and that any mitigation is captured within that Chapter it is agreed that Human Health can be scoped out of the ES.

Noise and Vibration

There are no comments within your scoping report in relation to this topic. The Report indicates that the proposed development is to be office accommodation.

The submitted Acoustic Assessment will need to include the following details and considerations:

- I. Internal noise levels need to meet the criteria set out in MCC's Planning Noise Guidance document (included in the link below) and consider details of the maximum internal noise level permissible to not exceed the external levels recommended, details of façade / glazing / door performance, details of any lobbied door system and performance / specification.
- II. In terms of noise from the external terrace the assessment should confirm the distance to the receptors. It will need to confirm and agree the proposed number of patrons / terrace capacity and hours of use for the external areas, especially as the assessment refers to over 600 people using the external roof terrace which would be far too excessive with residential nearby. The assessment can be based on 50% of people talking as included in the scoping report. The use of external speakers or music of any kind in the external terraces would not be supported and the use would not be supported beyond 23:00 (shorter hours may be recommended once the full details are known).
- III. Any plant to be installed will need to be selected and designed and subsequently be assessed against MCC's Planning Noise Guidance document (including kitchen extraction). The representative background noise has been provided which is accepted (North and East Elevation 54dB day and 51dB Night, and South and West elevations 51dB and 48dB night). However, the proposed limits do not seem to correspond to the background noise levels and the 5dB below criteria as they appear to be higher than the criteria and this needs to be reviewed.
- IV. Construction noise impacts will be assessed and managed through measures in the CEMP and noise and vibration control measures including site noise and vibration levels will need to be agreed by MCC.

See link to Guidance below:

http://www.manchester.gov.uk/info/500207/planning_and_regeneration/1962/additional_planning_guidance/3

On the above basis Noise and Vibration can be scoped out of the ES.

Socio-economic impacts

The comments within your scoping report are noted. On the basis that any Socio Economic Impacts associated with the development are considered within a supporting

Economic Statement (and that any mitigation is captured within that Report) and that impact on the economy and job creation and the contribution that this will make to the ongoing regeneration within this part of the City will be addressed within the Planning Statement it is agreed that Socio-economic impacts can be scoped out of the ES.

Solar Glare

The comments within your scoping report are noted and on this basis it is accepted that solar glare can be scoped out of the ES. Consideration of this matter and any mitigation required should however be included within the Sunlight and Daylight Report to be submitted with the application or as a section within the Planning Statement.

Transport and Access

The comments within your scoping report are noted. I consider that Transport and Access does not need to be included as part of the EIA and on the basis of these it is agreed that Transport and Access can be scoped out of the ES. The application should however be supported by a Transport Assessment (TA). The TA should consider the impact of the development on the existing public transport networks in terms of extension of bus services, additional person trips. Mitigation measures should be considered where appropriate. (further guidance on the content of the TA is given in the attached comments from MCC Highways and TFGM)

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

Lighting

There are no comments within your scoping report in relation to lighting however it is accepted that Lighting is capable of being scoped out of the ES but information on this should form part of the supporting documents to the planning application.

Waste

There are no comments on this within your scoping report. The approach to waste management should cover management of commercial waste with a waste assessment and a completed waste proforma will need to be provided with the application to demonstrate that the commercial waste storage and collection regime will comply with the requirements of GD04. Subject to this detail and a Site Waste Management Plan ('SWMP') forming part of the supporting documents to the planning application, Waste can be scoped out of the ES.

Accidents and disasters

There are no comments on this within your scoping report however it is considered that the nature of the proposed development is such that it not considered to pose risk of major accidents and/or disasters. As such, accidents and disasters can be scoped out of the ES.

Summary

I agree that some of the matters you have identified to be scoped out of the ES are appropriate with the addition of Noise and Vibration, Accidents and Disasters, Lighting and

Waste. I am of the opinion, however, that Climate Change Impacts (with the exception of social value) (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.

- Flood Risk and Drainage;
- Sunlight, daylight and Overshadowing;
- Townscape and Visual Impact;
- Wind

As highlighted above, you should also include Climate Change, within relevant chapters within the ES.

General Comments

The scoping report identifies the development site as being located within Manchester City Centre. For planning purposes, the development site is located in the Regional Centre (policy EC3) as defined within the Manchester Core Strategy (2012).

The significance of the site in regional terms should be reflected throughout the ES. The Environmental Chapters must therefore consider the impacts of the Proposed Development on the local context 'Regional Centre' together with Manchester City Centre, the North West Region and the national context (where appropriate) in order to determine any wider significant environmental impacts.

Daylight, Sunlight and Overshadowing

The assessment scope within your scoping report are noted. It is noted that the Symphony Square amenity area is close to the site and as such, an overshadowing assessment is required.

On the above basis the scope of consideration of Daylight, Sunlight and Overshadowing is acceptable in terms of consideration in the ES.

Water Resources (including Drainage and Flood Risk)

The comments within your scoping report are noted and are generally however the following should be noted:

Significant effects identified should show mitigation where applicable.

- The proposed development is situated within Flood Zone 1 and 2. The Flood Map for Rivers and Sea can be viewed at: <http://maps.environment-agency.gov.uk/>. The proposal is within 20m of a main river. The flood risk assessment should adhere to national policy. The Environment Agency should be consulted on the proposal. The Sequential approach to the proposed development and finished floor levels should be agreed with the Environment Agency.
- The site is largely at low risk of surface water flooding. The Flood Map for Surface Water can be viewed at: <http://maps.environment-agency.gov.uk/>.
- The proposed development is within an area at low susceptibility to groundwater flooding.

We recommend that the application is supported by a Manchester City Council data screen. This is a service that screens our databases of asset registers and historic flood incidents. This £150 service can be arranged on request by contacting floodriskmanagement@manchester.gov.uk

The Scoping Statement states '*drainage infrastructure has been installed under previous phases to accommodate for this phase*'. Further detail should be provided in the submission for this application.

Should there be any new proposed drainage, surface water management needs to follow the drainage hierarchy:

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

The area is situated within a Critical Drainage Area and in accordance with the Manchester City Council SFRA, any new drainage should provide at least a 50% reduction in surface water runoff should be provided through SUDS as part of any brownfield development with the aim of reducing to the Greenfield runoff rates.

The Government has strengthened planning policy on the provision of sustainable drainage systems (SuDS) for 'major' planning applications which was introduced on 6 April 2015 (Paragraph 103 of National Planning Policy Framework and Ministerial Statement on SuDS). As per the guidance issued by the Department of Communities and Local Government (DCLG), all 'major' planning applications being determined from 6 April 2015, must consider sustainable drainage systems.

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. Greater Manchester is the first city-region in the UK to develop a Natural Capital Investment Plan designed to encourage investments in natural capital that deliver financial as well as social returns.

The use of SuDS should also help achieve the sustainability objectives of the National Planning Policy Framework (NPPF).

The suitability of sustainable drainage systems should be assessed in accordance with paragraphs 051, 079 and 080 of the revised NPPF Planning Practice Guidance for Flood Risk and Coastal Change (<http://planningguidance.planningportal.gov.uk/blog/guidance/flood-risk-and-coastal-change/>).

Sustainable drainage systems should be designed in line with national Non-Statutory Technical Standards for SuDS (https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/415773/sustainable-drainage-technical-standards.pdf) and local policies EN08, EN09, EN14, EN15 and EN17 of the Core Strategy.

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 in accordance with paragraph 081 of NPPF Planning Practice Guidance.

Management and maintenance plan for the lifetime of the development which shall include the arrangements for adoption by any public body or statutory undertaker, or any other arrangements to secure the operation of the sustainable drainage scheme throughout its lifetime shall be submitted.

Townscape and Visual Impact

The comments within your scoping report and the CIRCLE SQUARE PLOT 12C APPENDIX 4: KEY VIEWS AND PHOTOMONTAGES and 8.1 Viewpoint Location Plan are noted and are acceptable in terms of their consideration in the ES.

It is essential that the ES considers the cumulative impacts of other developments in order to full understand the likely impacts of the Proposed Development and a scoping exercise will be required in relation to the following in this respect:

121252/FO/2018: Great Marlborough Street Car Park, Great Marlborough Street Manchester

Partial reconfiguration of existing Multi-Storey Car Park (MSCP), including temporary access off Great Marlborough Street, construction of 5 storey external ramps, closure of vehicular access to top level; and construction of new facade; and partial demolition of the surplus part of existing MSCP and erection of a part 55, part 11 storey, part 4 storey mixed-use building comprising 853 Purpose Built Student Accommodation units (sui generis), ancillary amenity space and support facilities, and 786sqm (GIA) SME incubator workspace (Use Class B1), including public realm improvements and other associated work;

Wind Microclimate

The assessment scope within your scoping report is noted and on this basis the scope of consideration is acceptable in terms of the consideration of Wind and Microclimate issues in the ES.

Climate Change

It is considered that the climate change impacts of the Proposed Development are significant (including the need to evaluate and consider the whole life cycle carbon implications of the sites redevelopment) and require assessment through the EIA process with the exception of social value (subject to this socio economic consideration being addressed within the planning application (e.g. via local labour agreement and delivering wider regeneration objectives)).

The Proposed Development is likely to give rise to significant environmental impacts on the climate which should be considered and evaluated through the ES. The ES should consider the impact of the Proposed Development on climate change both through the construction and operational phases of the development and the significance of these impacts needs to be considered.

A broad approach and methodology for assessing the impact on climate change should be considered. The climate change chapter should assess human health within a climate change resilience assessment as by considering the vulnerability/resilience of the proposed development, this assessment will by implication also consider the resilience of on-site and surrounding receptors in respect human health. Human health should also be considered in the in-combination climate change assessment by considering the additive impacts of climate change to those effects identified in the other technical assessment chapters.

Impacts and potential mitigation from the other technical chapters should feed into this assessment particularly around management of surface water, waste management, green and blue infrastructure, biodiversity and ecology, travel planning and efficiency of the building fabric, an assessment of the lifecycle of the building (including management of embodied carbon) and use of renewable energy as part of promoting a low carbon development and reducing emissions and the likely environmental impacts of this.

Cumulative impacts

It is noted that you do not intend to include assessment of cumulative schemes within the ES as all the relevant nearby planning permissions have been implemented. They therefore form the baseline. However the following consents within the vicinity of the site

have potential to have cumulative impacts of developments in this part of the City Centre and should be considered in such an assessment:

121252/FO/2018: Great Marlborough Street Car Park, Great Marlborough Street Manchester

Partial reconfiguration of existing Multi-Storey Car Park (MSCP), including temporary access off Great Marlborough Street, construction of 5 storey external ramps, closure of vehicular access to top level; and construction of new facade; and partial demolition of the surplus part of existing MSCP and erection of a part 55, part 11 storey, part 4 storey mixed-use building comprising 853 Purpose Built Student Accommodation units (sui generis), ancillary amenity space and support facilities, and 786sqm (GIA) SME incubator workspace (Use Class B1), including public realm improvements and other associated work;

132600/FO/2021 : Plot 9 First Street, Manchester, M15 4FN

Erection of a nine-storey building with rooftop plant and basement comprising office accommodation (Use Class E(c)) with ancillary facilities for occupiers including roof top terrace, winter gardens, gym/ yoga studio, basement car parking (26 spaces) and cycle parking (130 spaces) landscaping and other associated works

It is noted that the following developments have been implemented and that they are included in the baseline:

125799/FO/2019 : John Dalton West / John Dalton Tower, Chester Street, Manchester

Demolition of existing John Dalton West Building and associated structures, and erection of a new 7 storey education building (Use Class D1) for the Faculty of Science and Engineering (comprising teaching and research spaces, academic offices, social learning areas, catering/kitchen facilities and an energy centre), physical connections to and external refurbishment of the John Dalton Tower, hard and soft landscaping works, car and cycle parking and associated works.

125573/FO/2019: Plot 11 First Street Comprising Land Bound By Hulme Street To The North, Wilmott Street To The East, The Unite Parkway Gate Development And Mancunian

Construction of four buildings of heights varying from 10 storeys to 45 storeys together comprising Co-living bedspaces (use class sui generis) and associated amenity facilities, with ground floor commercial units (Use classes A3 (Café / Restaurant and D2 (Gym)), private amenity space and public realm comprising hard and soft landscaping, car parking and cycle facilities and other associated works;

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.

This letter also confirms the matters within part I of Schedule 4 to the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 that need to be covered within the Environmental Statement.

If you wish to discuss the above please contact Angela Leckie on the above number.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Julie Roscoe', enclosed within a thin black rectangular border.

Julie Roscoe

Head of Planning (attachments sent by e-mail)