



MANCHESTER CITY COUNCIL

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Your reference:

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19th May 2022

FAO Ed Britton
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 Cardinal House, St Mary's Parsonage , Albert Bridge House (car
park) and the River Irwell.**

Scoping Opinion of Manchester City Council Pursuant to Regulation 15

Further to your request in respect of the above dated 25th February 2022 and your
subsequent e-mail dated 21st April 2022 (Highways) and your agreement of an extension
of time to issue this Scoping Opinion.

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 " *Alberton House, 30 St Mary's Parsonage, Manchester
Environmental Impact Assessment (EIA) Screening and Scoping Report
February 2022*" prepared and submitted by yourselves on behalf of the Applicant
Bruntwood RB 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 February 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

Townscape and Visual;
Heritage;
Ground Conditions;

Scoped out

- *Agricultural circumstances;*
- *Aviation*
- *Air quality and dust;*

- *Archaeology;*
- *Daylight and Sunlight;*
- *Ecology and nature conservation;*
- *Electronic Interference;*
- *Noise and Vibration;*
- *Transport and Access;*
- *Flood Risk and Drainage;*
- *Wind Microclimate;*
- *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.

- Historic England;
- 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;
- Manchester Airport Group Safeguarding.

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 0.298ha and is part occupied by a building known as Alberton House a partially vacant office building, part 12, part 4 storey office building, which has an L-shaped footprint with its main entrance set back from the street edge of St Mary's Parsonage. The 12 storey part of the building abuts the River Irwell on its north western edge and back of house servicing access is provided off St Mary's Parsonage along the Site's south western edge where there are areas of hard and soft landscaping adjacent to the River Irwell.

The Site is identified for redevelopment within the endorsed St Mary's Parsonage Strategic Regeneration Framework ('the SRF') (August 2020). Immediately adjacent to the service access route, to the west of the existing building, is the access to the pedestrian footbridge (Trinity Bridge), which provides a key connection between Salford and Manchester City Centre. The existing footbridge access off St Mary's Parsonage is positioned between the Albert Bridge House car park and the Alberton House service road.

To the south of the Trinity Bridge pedestrian access is Albert Bridge House, an 18 storey 1950's commercial office building. To the south east is 3 St Mary's Parsonage and Reedham House, which are each four storey Grade II listed buildings. To the north of the Site is Cardinal House, which is a ten storey commercial office building, built in the 1970's. All three of these neighbouring sites are identified within the SRF as having potential for complete or partial redevelopment, although no formal proposals have been submitted for the sites to date

The area which is the subject of this Scoping Opinion is located in the south eastern portion of the SRF Area. The Site is not located within a Conservation Area, although it is situated just outside of the boundary of the Parsonage Gardens Conservation Area within the setting of a number of listed buildings (as identified below as sensitive receptors).

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 Irwell located adjacent to the sites northern border.

The Site, is mainly located in Flood Zone 1 and this portion of the Site is of a low risk of flooding (indicating a less than 1 in 1,000 annual probability of flooding). The north western boundary of the Site is located within Flood Zone 3 (indicating a high probability of flooding of 1 in 100 or greater, this part of the Site is within an area with a high probability of flooding. The site is situated within the Manchester, Salford and Trafford Critical Drainage Area (CDA).

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 15 built heritage assets within a 250m radius of the site. The closest heritage assets to the site are:

- Grade II Listed Century Buildings, located to the north east of the site;
- Grade II Listed 3 St Mary's Parsonage, located adjacent to the east of the site;
- Grade II Listed 31 & 33 King Street West located to the south east of the site;
- Deansgate/ Peter Street Conservation Area located to the south east of the site; and
- St Mary's Parsonage Gardens Conservation Area, located adjacent to the sites eastern border.

Due to the high level of built form around the Site it is considered this radius is proportionate for the purposes of this assessment.

Century Buildings to the north east of the site is a residential building.

PROPOSED DEVELOPMENT

The Proposed Development would involve the demolition of existing building and erection of a new 20 storey building (approx. 117 AOD) comprising 16 floors of office (Class E), 2 floors of retail (Class E) and a two storey rooftop pavilion comprising an ancillary wellness centre to directly serve the commercial office tenants (Sui Generis) with landscaping and public realm; and other associated works

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.

The alternatives detailed within the scoping report are considered to be acceptable. The ES should include an indication of the main reasons for the option chosen, including a comparison of the environmental effects.

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 observes that Salford Archaeology, has concluded that the archaeological interest in the Site dates primarily to the eighteenth and nineteenth centuries. Any such remains are likely to be of High Local / Borough significance, pending the extent to which buried physical remains survive in-situ. It is noted that further investigation to confirm the presence, extent and significance of the archaeological resource across the Site has been agreed and will be implemented prior to any development works.

It is accepted that Archaeology can be scoped out of the ES provided the planning application is supported by a comprehensive archaeological desk-based assessment to assess the potential impact of the Proposed Development on the sub-surface archaeological resource.

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.

Daylight, Sunlight and Overshadowing

Due to the scale of the Proposed Development, the preliminary review of the likely effects relating to daylight, sunlight and overshadowing has revealed that due to the distance and orientation of the Proposed Development from any existing surrounding residential receptors, it is considered that there is no potential for significant environmental impacts. The closest residential receptor, Century Buildings, only has very limited windows overlooking the Proposed Development, and research indicates that these windows serve a dual aspect room, with an alternative window facing away from the Proposed Development.

I accept that a daylight, sunlight and overshadowing assessment is capable of being scoped out of the ES provided an appropriate report, including mitigation should this be required, accompanies any future planning application. On this basis, a Daylight and Sunlight chapter is not considered necessary, and will be scoped out of the EIA.

Ecology and nature conservation

The comments within your scoping report are noted. The site currently comprises an office building Alberton House which fronts onto St. Mary's Parsonage in central Manchester and the rear of the building looks out onto the River Irwell close to Spinningfields and Deansgate. There are two building blocks forming an 'L'-shape of five and eleven storeys

faced with red brick and flat roof. There are areas of formal planting at the front of the building and, at the back, a balcony over slabbed sloping ground that runs down to a narrow wooded corridor on the banks of the River Irwell which are of limited ecological value and any potential impact on ecology is considered to be of no more than local significance. There is negligible potential for roosting bats to be present within the building, and no evidence of roosting was found during the building inspection. The habitats on Site were of low value to foraging and commuting bats, although the woodland area next to the River Irwell corridor offered some forage habitat. No evidence of other protected species was found during the survey. Potential for nesting birds is identified within the denser shrub planting and within trees/woodland areas. The ecological value of the development site is low with the main potential impact being on the River Irwell and it is noted that there is the potential to enhance ecology and biodiversity in this area.

Demolition is recommended to be outside the bird breeding season (March – August inclusive). If this is not the case then a pre commencement survey should be included and should encompass an assessment for breeding black redstart (Schedule 1 Wildlife & Countryside Act 1981).

Given the number and proximity of black redstart records (GMLRC), it is recommended that enhancement measures are included for this species (Greater Manchester Biodiversity Action Plan Species). This could include consideration of construction of a green or brown roof.

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 Air Quality can be scoped out of the ES.

Human Health

The comments within your scoping report and e-mail of 21st April 2022 are noted. On the basis that any impacts associated with Human Health will be considered within the Climate Change 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

The comments within your scoping report are noted. 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 I agree that Noise and Vibration can be scoped out of the ES.

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)

You should note that Highways and Curtins have discussed the proposed loading bay design. Two options are proposed (Drawing 80058-CUR-XX-00-D-TP-75002-P01_Loading Bay Option1 and Drawing 80058-CUR-XX-00-D-TP-75003-P01 Loading Bay Option2). Both these options have been subject to an independent road safety audit which found no concerns with the design but detailed concerns of the lack of traffic calming proposed on St. Marys Parsonage southbound.

Highways would accept either Option 1 or Option 2, but on the condition that traffic calming is proposed on St. Marys Parsonage southbound.

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

In relation to bus infrastructure, for example relocation of existing bus stops or the creation of new bus parking areas, TfGM would request that the developer liaise directly with TfGM's bus infrastructure which can be contacted at Shelters@tfgm.com

Water Resources (including Drainage and Flood Risk)

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

The proposed development is situated within Flood Zone 1&3 low - high probability from the River Irwell. The Flood Map for Rivers and Sea can be viewed at: <http://maps.environment-agency.gov.uk/>.

The proposed development is generally within an area at very 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.

MCC does not hold any recorded incidents of flooding within the site.

The area is situated within the Conurbation Core Critical Drainage Area and in accordance with the Manchester City Council SFRA at least a 50% reduction in surface water runoff should be provided through SUDS as part of any development which is situated on a brownfield site.

Surface water management for the site 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.

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.

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. Due to the size of the development the restriction for implementing SuDS within the site layout is minimal. We would also recommend that SuDS are drawn up within the site layout at the early stages of design.

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://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/415773/sustainable-drainage-technical-standards.pdf) and local policies EN08, EN14 and EN17 of the Core Strategy.

Hydraulic calculations and drawings to support the design need to be provided and updated along with proposed standards of operation and maintenance in accordance with paragraph 081 of NPPF Planning Practice Guidance.

On the basis that the above and any mitigation is captured within the Flood Risk Assessment and Drainage Strategy it is agreed that Water Resources (including Drainage and Flood Risk) can be scoped out of the ES.

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.

Socio-economic impacts

The comments within your scoping report and e-mail of 21st April 2022 are noted. On the basis that any Socio Economic Impacts associated with the development will be 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 Human Health can be scoped out of the ES.

Wind Microclimate

The comments within your scoping report in relation to this topic area are noted. On the basis that a Wind Report is to be submitted with the application and that any mitigation is captured within that Report it is agreed that Wind Microclimate can be scoped out of the ES.

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 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.

- Townscape and Visual Impact;
- Heritage
- Ground conditions

As highlighted above, you should also include Climate Change, Human Health and Socio-Economic Impacts 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.

Ground conditions

The comments within your scoping report are noted and are acceptable in terms of their consideration in the ES subject to a Phase 1 Preliminary Site Assessment (PRA) being submitted as part of the supporting documents to the planning application.

Townscape and Visual Impact

The comments within your scoping report including the Receptors and Key views within Appendix II LVIA Figures 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.

Heritage

The comments within your scoping report (including the intention for consultation to be undertaken with MCC and Historic England to agree the scope of the Chapter) are noted and on this basis are acceptable in terms of their consideration 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.

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. 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. It is however agreed that social value can be scoped out on the basis that this is to be addressed elsewhere in the application as detailed in your e-mail of 21st April 2022.

Cumulative impacts

The list of cumulative sites for assessment has been considered in order to assess any cumulative impacts of developments in this part of the City Centre is acceptable in terms of consideration in the ES with the addition of the following:

App ref no 132429/FO/2021: Two Parcels Of Land Known As "Trinity Islands" Bounded By The River Irwell, Regent Road, Water Street, Trinity Way And The Railway, Manchester M3 4JW

Erection of four towers ranging from 39, 48, 55 and 60 storeys to form a mixed use development comprising 1950 residential apartments (Use Class C3a) and commercial uses (Use Classes E and Sui Generis: Drinking Establishment) (361 sqm) within the podium level together with public realm, car and cycle parking, access arrangements and highway works, and other associated works; and

132199/FO/2021: Plot F, Great Jackson Street, Manchester

Full planning permission for the demolition of existing structures and the erection of two 51-storey residential buildings (Use Class C3) across two phases, including residential amenity facilities, basement car parking, landscaping and public realm, servicing and access arrangements, highways alterations, and 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)