



**MANCHESTER
CITY COUNCIL**

Julie Roscoe

Director of Planning, Building
Control and Licensing

PO Box 532
Town Hall
Manchester M60 2LA

Campbell Risdon
Ramboll
240 Blackfriars Road
London
SE1 8NW

Contact: Emily Booth
Tel: 0161 234 4193
Fax: 0161 274 0014
Email: emily.booth@manchester.gov.uk

5th January 2026

Our reference: EB/DMN/EIASCO/25/012

Dear Mr Risdon,

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

SCOPING REQUEST UNDER PART 4 REGULATION 15(1)

**'SITE OFF LORD STREET, MANCHESTER' – DEVELOPMENT OF A 23
STOREY TOWER PROVIDING 221 RESIDENTIAL UNITS ("THE PROPOSED
DEVELOPMENT")**

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

Thank you for your request dated 20 November 2025 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 *'Request for Scoping Opinion'* prepared by yourselves, on behalf of the Applicant Manchester City Council, 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, Section 10 (Urban Development Projects) of the EIA Regulations as an 'Urban Development Project' which has the potential to have significant effects on the environment. In accordance with Schedule 2, 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.
- (d) the environmental features likely to be significantly affected by the development.

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

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

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

Your report of November 2025 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 -

- Daylight/Sunlight:
 - o Assessment of the impact on residential accommodation, including impact on Daylight and Sunlight Amenity of habitable rooms and Sunlight Amenity of identified external amenity spaces
- Wind
- Socio- Economic and Human Health:
 - o Housing
 - o Open Space, Leisure and Play
 - o Employment and Income - increase
 - o Built Environment
- Climate Change and Greenhouse Gases
- Townscape and Visual Impact:

- Height/Scale, massing, grain and skyline contribution
- Visual amenity of the public realm
- Heritage-related views
- Cumulative Visual/Townscape Effects

Scoped out -

- Daylight and Sunlight:
 - Impact on residential buildings not identified in the report and on commercial buildings.
- Socio- Economic and Human Health:
 - Risk Taking behaviour
 - Diet and Nutrition
 - Employment and Income – increase or reduce opportunities
 - Transport modes
 - Relocation
 - Community identity, culture, resilience and influence
 - Social participation, interaction and support
 - Education and training
 - Air Quality
 - Water Quality
 - Land Quality
 - Radiation
 - Crime and Community Safety
 - Climate Change
 - Health and Social Care Services
- Townscape and Visual Impact:
 - Views beyond 1km
 - Private interior views
 - Glare/Reflectivity Studies Transport and Access
- Ecology:
- Water Resources and Flood Risk
- Ground Conditions
- Transport
- Noise and Vibration
- Materials and Waste
- Aviation
- Archaeology
- Major Incidents and Disasters

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.

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)
- Historic England
- United Utilities
- Cadent Gas
- City Council Highway Services
- City Council Environmental Health
- City Council Flood Risk Management
- City Council Arborist
- City Council City Centre Regeneration
- City Council Housing Strategy
- 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 site is bound by Cheetham Hill Road to the west, Lord Street to the north and Fernie Road to the east and by a Texaco Petrol Station to the south.

The development site is approximately 0.18 hectares. It is a rectangular site containing vacant derelict land with one disused building and has been most recently occupied by seven commercial units.

The area is dominated by commercial premises, residential use, and offices associated with the Strangeways Warehouse district.

HMP Manchester lies approximately 330m to the west of the site. To the south of the site is Park Place, and the building at 25-31 Cheetham Hill Road is a bank.

The Green Quarter, a residential development, is located close to the site and is a primarily residential area with buildings that are 8-16 storeys tall.

The nearest listed buildings to the Site are the Roman Catholic Church of St Chad and Presbytery (and churchyard walls) on Cheetham Hill Road (Grade II), the former synagogue at 19 Cheetham Hill Road (Grade II) and various structures associated with HMP Manchester (Strangeways) (Grade II)

The site is within walking distance of the City Centre where there are many public transport connections. Both Victoria Station and Shudehill Interchange are approximately 10 minutes' walking distance from the site, providing train, tram and bus links.

SENSITIVE RECEPTORS

The development site is located within the Greater Manchester Combined Air Quality Management Area (AQMA) along Cheetham Hill Road.

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

The development site is not located within a Conservation Area and the site does not contain any listed buildings. There are listed buildings close to the development site.

PROPOSED DEVELOPMENT

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

The Proposed Development would consist of the following works:

- Demolition of existing structures and site enabling works
- Erection of a 23-storey building, including a 935sqm basement to form 221 residential apartments, including 4 town houses (Use Class C3a).
- The development would be car free and include cycle parking.

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 be 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 table 4.5 of your Scoping Report 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 and partly scoped out of the ES.

- Ecology:
- Water Resources and Flood Risk
- Ground Conditions
- Transport
- Noise and Vibration
- Materials and Waste
- Aviation
- Archaeology
- Major Incidents and Disasters
- Daylight and Sunlight:
 - o Impact on residential buildings not identified in the report and on commercial buildings.
- Socio- Economic and Human Health:
 - o Risk Taking behaviour
 - o Diet and Nutrition
 - o Employment and Income – increase or reduce opportunities
 - o Transport modes
 - o Relocation
 - o Community identity, culture, resilience and influence
 - o Social participation, interaction and support
 - o Education and training
 - o Air Quality
 - o Water Quality
 - o Land Quality
 - o Radiation
 - o Crime and Community Safety
 - o Climate Change
 - o Health and Social Care Services
- Noise and vibration:
 - o ground-borne noise
 - o tranquil areas
 - o vibration during operation only
 - o traffic noise during operation only.
- Townscape and Visual Impact:

- Views beyond 1km
- Private interior views
- Glare/Reflectivity Studies Transport and Access

Air Quality

Air quality can be scoped out of the EIA as the Scoping Report submitted includes an Air Quality Assessment prepared by Redmore dated 16th October 2025 and referenced 9835r1. The content of this report can be agreed, and this report should be submitted as part of the planning application. The construction management plan for the development should include the mitigation measures within table 15 for control of fugitive dust emissions during the demolition and construction process. This CMP should also be submitted as part of the application.

Archaeology

Archaeology can be scoped out of the EIA as a 2016 archaeological assessment was produced as has informed the scoping report. The planning application should be supported by a suitable desk-based assessment. The need for intrusive archaeological investigation can be determined in due course once the design has been finalised and these works can be secured by a planning condition.

Ecology/Biodiversity

Ecology/Biodiversity can be scoped out of the EIA. The planning application should be supported by a suitable ecological assessment and a BNG Statement. Potential ecological issues including bats, nesting birds, and biodiversity net gain/ecological enhancements. A robust assessment of environmental impacts and opportunities based on relevant and up to date environmental information should be undertaken prior to a decision on whether to grant planning permission.

Ground Conditions

Ground Conditions can be scoped out of the EIA. The planning application should be supported by a suitable assessment.

Noise

Noise and Vibrations can be scoped out of the EIA subject to clarification. The planning application should be supported by a acoustic assessment and recommendations with regard to building insulation to address noise break in to the residential units from external noise and noise transfer from the ground floor and mezzanine commercial units. An AVO overheating assessment will also be required for the residential apartments. Assessment of noise breakout from the commercial and mezzanine units will be required and assessment of noise from any plant associated with the commercial units and also noise from the building ventilation system with regard to our noise criteria and recommendations providing for any insulation/ mitigation measures required. Please see the Environmental Health comments in full which are appended to this letter.

Transport

It is not agreed that Highways can be scoped out of the EIA. The statement shall include the information required by Highway Services within their comments that are attached to this letter.

Water Resources, Drainage and Flood Risk

Flood Risk and Drainage can be scoped out of the EIA. A Flood Risk Assessment and Drainage Strategy must be submitted to support the Planning Application. This should demonstrate design compliance with national and local policy.

Proposals for surface water attenuation are to align with the Manchester, Trafford and Salford Strategic Flood Risk Assessment. For brownfield sites a minimum of 50% betterment is required for reduction in runoff rate compared to the existing rates with the aim of reducing to the Greenfield runoff rates.

Heritage

Heritage cannot be scoped out of the EIA. Given the magnitude of the development the impact on the significance of the nearby heritage assets is required to be assessed.

Townscape and Visual Impact

Townscape and Visual Impact must be scoped into the EIA. It is however agreed that views beyond 1k, private interior views and glare/reflectivity Studies Transport and Access can be scoped out with all other relevant assessments scoped in to understand the full impact on the rich character surrounding the site.

Socio- Economic and Human Health

It is also proposed to scope the following assessments out of this section of the EIA:

- Risk Taking behaviour
- Diet and Nutrition
- Employment and Income – increase or reduce opportunities
- Transport modes
- Relocation
- Community identity, culture, resilience and influence
- Social participation, interaction and support
- Education and training
- Water Quality
- Land Quality
- Radiation
- Crime and Community Safety
- Climate Change
- Health and Social Care Services

Climate change cannot be scoped out of the EIA. Given the magnitude of the development all climate change issues are required to be assessed.

All of the other above Socio- Economic and Human Health assessments can be scoped out, but the following information would be required as part of the application.

- A completed Local Labour template for the construction period
- An Energy Statement
- A Crime Impact Statement

Daylight and Sunlight

The following can be scoped out of this section of the EIA:

- Impact on residential buildings not identified in the report and on commercial buildings.

Materials and Waste

Materials and waste can be scoped out of the EIA on the basis of the IEMA Guidance (Ref 8.1) (page 14).

The planning application should be supported by a description of the materials. These materials should be sought from as local suppliers as possible.

Waste management will be expected to comply with City Council requirements and waste will be required to be disposed of as sustainably as possible.

Aviation

Aviation can be scoped out of the EIA due to the distance between the site and Manchester Airport and flight paths.

Major Incidents and Disasters

I note that the proposed development does not pose a risk of major accident and/or disaster. As such, I can confirm that accidents and disasters can be scoped out the ES.

Summary

I agree that the matters you have identified to be scoped out of the ES are appropriate with the exception of heritage and highways.

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.

- Daylight/Sunlight:
 - o Assessment of the impact on residential accommodation, including impact on Daylight and Sunlight Amenity of habitable rooms and Sunlight Amenity of identified external amenity spaces
- Wind
- Socio- Economic and Human Health:
 - o Housing
 - o Open Space, Leisure and Play
 - o Employment and Income - increase
 - o Built Environment
- Climate Change and Greenhouse Gases
- Townscape and Visual Impact:
 - o Height/Scale, massing, grain and skyline contribution
 - o Visual amenity of the public realm
 - o Heritage-related views
 - o Cumulative Visual/Townscape Effects

As highlighted above, you should also include Heritage and Highways within relevant chapters within the ES.

General Comments

For planning purposes, the development site is located in a Strategic Housing Location (policy H2) of the Manchester Core Strategy (2012) together with forming a component of the Great Ducie Street Strategic Regeneration Framework Area.

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.

Climate Change

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

Human Health

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

Sunlight, Daylight and Overshadowing

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

Townscape and Visual Impact

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

Socio economics

Socio economic impacts should be scoped into the EIA.

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 Emily Booth.

Yours sincerely



Dave Roscoe

Deputy Director of Planning

Manchester City Council
Town Hall Albert Square
Manchester
Lancashire
M2 5DB

Our ref: SO/2025/125429/01
Your ref: EIASCO/25/012
Date: 04 December 2025

Dear Emily Booth,

Request for Scoping opinion under Part 4, Regulation 15 of The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended).

Site Off Lord Street Manchester

Thank you for consulting the Environment Agency on the above Environmental Impact Assessment (EIA) Scoping Report, on 27 November 2025.

Environment Agency Comments

We have no comments to make in regards to this EIA Scoping Opinion at this current stage.

Yours sincerely,


Planning Specialist




Application EIASCO/25/012 - Lord Street Manchester - Consultation Response (Archaeology)

From [REDACTED]
Date Tue 12/9/2025 7:22 PM
To Emily Booth [REDACTED]

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Good afternoon Emily

RE: Application EIASCO/25/012 - Request for Scoping Opinion - Site off Lord Street, Manchester

Thank you for consulting GMAAS for a Scoping Opinion on the above proposed scheme.

The application is supported by an EIA Scoping Report prepared by Ramboll in November 2025. This incorporates a section on archaeology (paras 7.9.57 – 7.9.64), which draws on an archaeological assessment of the site produced in 2016 to provide a brief overview of the archaeological baseline. It is concluded that the delivery of the proposed scheme will not have any significant effects on the below-ground archaeological resource and any remains that do exist would be of local importance only. As such, it is proposed that archaeology as a topic can be scoped out of the EIA.

GMAAS is content with this conclusion and agrees that archaeology can be scoped out of the EIA process, especially as an archaeological desk-based assessment has been prepared. The assessment report recommends that further intrusive archaeological investigation should be undertaken in advance of development. The requirement for further archaeological investigation can be determined in due course once the design proposals have been finalised, and secured by a condition attached to planning consent.

With kindest regards



University of
Salford
MANCHESTER

[REDACTED]
Heritage Management Director
Greater Manchester Archaeological Advisory Service
Centre for Applied Archaeology, Peel Building
School of Science, Engineering & Environment
University of Salford, Manchester M5 4WT, UK
[REDACTED]





EIASCO/25/012

From [REDACTED]
Date Thu 12/11/2025 5:07 PM
To Emily Booth [REDACTED]

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Hi Emily,

Thank you for consulting the GMEU of a Request for Scoping Opinion at Site Off Lord Street, Manchester.

I would agree with the submitted EIA scoping report that ecology can be scoped out of any Environmental Impact Assessment that may be required. Potential ecological issues including bats, nesting birds, and biodiversity net gain/ecological enhancements, which can be dealt with through provision of an ecological appraisal and BNG assessment/statement when a planning application is submitted.

Kind regards,

[REDACTED]

[REDACTED]

**Ecology Planning Manager
Greater Manchester Ecology Unit (GMEU)**

Please note that my working days are Tuesday to Friday

[Tameside MBC](#) | [Twitter](#) | [Facebook](#) | [Instagram](#) | [LinkedIn](#)
Dukinfield Town Hall | King Street | Dukinfield | Tameside | SK16 4LA

Tel. [REDACTED]

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Date: 02 December 2025
Our ref: 534774
Your ref: EIASCO/25/012



Emily Booth
Manchester City Council

[Redacted]
BY EMAIL ONLY

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

T 0300 060 900

Dear Emily Booth

Environmental Impact Assessment Scoping consultation (Regulation 15 (4) of the Town and Country Planning EIA Regulations 2017): EIA scoping opinion for proposed 23-storey tower to provide 221 residential units

Location: Site Off Lord Street, Manchester

Thank you for seeking our advice on the scope of the Environmental Statement (ES) in the consultation dated 27 November 2025, received on 27 November 2025.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

A robust assessment of environmental impacts and opportunities based on relevant and up to date environmental information should be undertaken prior to a decision on whether to grant planning permission. Annex A to this letter provides Natural England's advice on the scope of the Environmental Impact Assessment (EIA) for the proposed development.

Further guidance is set out in Planning Practice Guidance on [environmental assessment, natural environment and climate change](#).

Should the proposal be amended in a way which significantly affects its impact on the natural environment then, in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, Natural England should be consulted again.

Please note that Natural England must be consulted on Environmental Statements.

Please send any new consultations or further information on this consultation to consultations@naturalengland.org.uk.

Yours sincerely

[Redacted]
Consultations Team

Annex A – Natural England Advice on EIA Scoping

General Principles

[Schedule 4](#) of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017, sets out the information that should be included in an Environmental Statement (ES) to assess impacts on the natural environment. This includes:

- A description of the development – including physical characteristics and the full land use requirements of the site during construction and operational phases
- Expected residues and emissions (water, air and soil pollution, noise, vibration, light, heat, radiation etc.) resulting from the operation of the proposed development
- An assessment of alternatives and clear reasoning as to why the preferred option has been chosen
- A description of the aspects of the environment likely to be significantly affected by the development including biodiversity (for example fauna and flora), land, including land take, soil, water, air, climate (for example greenhouse gas emissions, impacts relevant to adaptation, cultural heritage and landscape and the interrelationship between the above factors
- A description of the likely significant effects of the development on the environment – this should cover direct effects but also any indirect, secondary, cumulative, short, medium, and long term, permanent and temporary, positive, and negative effects. Effects should relate to the existence of the development, the use of natural resources (in particular land, soil, water and biodiversity) and the emissions from pollutants. This should also include a description of the forecasting methods to predict the likely effects on the environment
- A description of the measures envisaged to prevent, reduce and where possible offset any significant adverse effects on the environment
- A non-technical summary of the information
- An indication of any difficulties (technical deficiencies or lack of know-how) encountered by the applicant in compiling the required information

Further guidance is set out in Planning Practice Guidance on [environmental assessment](#) and [natural environment](#).

Cumulative and in-combination effects

The ES should fully consider the implications of the whole development proposal. This should include an assessment of all supporting infrastructure.

An impact assessment should identify, describe, and evaluate the effects that are likely to result from the project in combination with other projects and activities that are being, have been or will be carried out. The following types of projects should be included in such an assessment (subject to available information):

- a. existing completed projects;
- b. approved but uncompleted projects;
- c. ongoing activities;
- d. plans or projects for which an application has been made and which are under consideration by the consenting authorities; and
- e. plans and projects which are reasonably foreseeable, i.e. projects for which an application has not yet been submitted, but which are likely to progress before completion of the development and for which sufficient information is available to assess the likelihood of cumulative and in-combination effects.

Environmental data

Natural England is required to make available information it holds where requested to do so. National datasets held by Natural England are available at <http://www.naturalengland.org.uk/publications/data/default.aspx>.

Detailed information on the natural environment is available at www.magic.gov.uk.

Natural England's SSSI Impact Risk Zones are a GIS dataset which can be used to help identify the potential for the development to impact on a SSSI. The dataset and user guidance can be accessed from the [Natural England Open Data Geoportal](#).

Natural England does not hold local information on local sites, local landscape character, priority habitats and species or protected species. Local environmental data should be obtained from the appropriate local bodies. This may include the local environmental records centre, the local wildlife trust, local geo-conservation group or other recording society.

Biodiversity and Geodiversity

General principles

The [National Planning Policy Framework](#) (paragraphs 192-196) sets out how to take account of biodiversity and geodiversity interests in planning decisions. Further guidance is set out in Planning Practice Guidance on the [natural environment](#).

The potential impact of the proposal upon sites and features of nature conservation interest and opportunities for nature recovery and biodiversity net gain should be included in the assessment.

Ecological Impact Assessment (EclA) is the process of identifying, quantifying, and evaluating the potential impacts of defined actions on ecosystems or their components. EclA may be carried out as part of the EIA process or to support other forms of environmental assessment or appraisal. [Guidelines](#) have been developed by the Chartered Institute of Ecology and Environmental Management (CIEEM).

Local planning authorities have a [duty](#) to conserve and enhance biodiversity as part of their decision making. Conserving biodiversity can include habitat restoration or enhancement. Further information is available [here](#).

Designated nature conservation sites

The proposal is unlikely to adversely impact any European or internationally designated nature conservation sites (including 'habitats sites' under the NPPF) or nationally designated sites (Sites of Special Scientific Interest, National Nature Reserves or Marine Conservation Zones).

Regionally and Locally Important Sites

The ES should consider any impacts upon local wildlife and geological sites, including local nature reserves. Local Sites are identified by the local wildlife trust, geoconservation group or other local group and protected under the NPPF (paragraph 192 and 193). The ES should set out proposals for mitigation of any impacts and if appropriate, compensation measures and opportunities for enhancement and improving connectivity with wider ecological networks. Contact the relevant local body for further information.

Protected Species

The conservation of species protected under the Wildlife and Countryside Act 1981 and the Conservation of Habitats and Species Regulations 2017 is explained in Part IV and Annex A of Government Circular 06/2005 [*Biodiversity and Geological Conservation: Statutory Obligations and their Impact within the Planning System*](#).

The ES should assess the impact of all phases of the proposal on protected species (including, for example, great crested newts, reptiles, birds, water voles, badgers and bats). Natural England does not hold comprehensive information regarding the locations of species protected by law. Records of protected species should be obtained from appropriate local biological record centres, nature conservation organisations and local groups. Consideration should be given to the wider context of the site, for example in terms of habitat linkages and protected species populations in the wider area.

The area likely to be affected by the development should be thoroughly surveyed by competent ecologists at appropriate times of year for relevant species and the survey results, impact assessments and appropriate accompanying mitigation strategies included as part of the ES. Surveys should always be carried out in optimal survey time periods and to current guidance by suitably qualified and, where necessary, licensed, consultants.

Natural England has adopted [standing advice](#) for protected species, which includes guidance on survey and mitigation measures. A separate protected species licence from Natural England or Defra may also be required.

District Level Licensing for Great Crested Newts

District level licensing (DLL) is a type of strategic mitigation licence for great crested newts (GCN) granted in certain areas at a local authority or wider scale. A [DLL scheme for GCN](#) may be in place at the location of the development site. If a DLL scheme is in place, developers can make a financial contribution to strategic, off-site habitat compensation instead of applying for a separate licence or carrying out individual detailed surveys. By demonstrating that DLL will be used, impacts on GCN can be scoped out of detailed assessment in the Environmental Statement.

Priority Habitats and Species

Priority Habitats and Species are of particular importance for nature conservation and included in the England Biodiversity List published under section 41 of the Natural Environment and Rural Communities Act 2006. Most priority habitats will be mapped either as Sites of Special Scientific Interest, on the Magic website or as Local Wildlife Sites. Lists of priority habitats and species can be found [here](#). Natural England does not routinely hold species data. Such data should be collected when impacts on priority habitats or species are considered likely.

Consideration should also be given to the potential environmental value of brownfield sites, often found in urban areas and former industrial land. Sites can be checked against the (draft) national Open Mosaic Habitat (OMH) inventory published by Natural England and freely available to [download](#). Further information is also available [here](#).

An appropriate level habitat survey should be carried out on the site, to identify any important habitats present. In addition, ornithological, botanical, and invertebrate surveys should be carried out at appropriate times in the year, to establish whether any scarce or priority species are present.

The Environmental Statement should include details of:

- Any historical data for the site affected by the proposal (e.g. from previous surveys)
- Additional surveys carried out as part of this proposal
- The habitats and species present

- The status of these habitats and species (e.g. whether priority species or habitat)
- The direct and indirect effects of the development upon those habitats and species
- Full details of any mitigation or compensation measures
- Opportunities for biodiversity net gain or other environmental enhancement

Ancient Woodland, ancient and veteran trees

The ES should assess the impacts of the proposal on any ancient woodland, ancient and veteran trees, and the scope to avoid and mitigate for adverse impacts. It should also consider opportunities for enhancement.

Natural England maintains the Ancient Woodland [Inventory](#) which can help identify ancient woodland. The [wood pasture and parkland inventory](#) sets out information on wood pasture and parkland.

The [ancient tree inventory](#) provides information on the location of ancient and veteran trees.

Natural England and the Forestry Commission have prepared [standing advice](#) on ancient woodland, ancient and veteran trees.

Biodiversity net gain

Paragraph 193 of the NPPF states that decisions should contribute to and enhance the natural and local environment by minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures.

Biodiversity Net Gain is additional to statutory requirements relating to designated nature conservation sites and protected species.

Proposals for mandatory biodiversity net gain should be in line with the Environment Act 2021 and supporting regulations. Further information on biodiversity net gain, including [draft Planning Practice Guidance](#), can be found [here](#)

The statutory [biodiversity metric](#), together with ecological advice, should be used to calculate the change in biodiversity resulting from proposed development and demonstrate how proposals can achieve a net gain.

The metric should be used to:

- assess or audit the biodiversity unit value of land within the application area
- calculate the losses and gains in biodiversity unit value resulting from proposed development
- demonstrate that the required percentage biodiversity net gain will be achieved

Biodiversity Net Gain outcomes can be achieved on site, off-site or through a combination of both. On-site provision should be considered first. Delivery should create or enhance habitats of equal or higher value. When delivering net gain, opportunities should be sought to link delivery to relevant plans or strategies e.g. Green Infrastructure Strategies or Local Nature Recovery Strategies.

Opportunities for wider environmental gains should also be considered.

Landscape

Landscape and visual impacts

The environmental assessment should refer to the relevant [National Character Areas](#). Character area profiles set out descriptions of each landscape area and statements of environmental opportunity.

The ES should include a full assessment of the potential impacts of the development on local landscape character using [landscape assessment methodologies](#). We encourage the use of Landscape Character Assessment (LCA), based on the good practice guidelines produced jointly by the Landscape Institute and Institute of Environmental Assessment in 2013. LCA provides a sound basis for guiding, informing, and understanding the ability of any location to accommodate change and to make positive proposals for conserving, enhancing or regenerating character.

A landscape and visual impact assessment should also be carried out for the proposed development and surrounding area. Natural England recommends use of the methodology set out in *Guidelines for Landscape and Visual Impact Assessment 2013* ((3rd edition) produced by the Landscape Institute and the Institute of Environmental Assessment and Management. For National Parks and AONBs, we advise that the assessment also includes effects on the 'special qualities' of the designated landscape, as set out in the statutory management plan for the area. These identify the particular landscape and related characteristics which underpin the natural beauty of the area and its designation status.

The assessment should also include the cumulative effect of the development with other relevant existing or proposed developments in the area. This should include an assessment of the impacts of other proposals currently at scoping stage.

To ensure high quality development that responds to and enhances local landscape character and distinctiveness, the siting and design of the proposed development should reflect local characteristics and, wherever possible, use local materials. Account should be taken of local design policies, design codes and guides as well as guidance in the [National Design Guide](#) and [National Model Design Code](#). The ES should set out the measures to be taken to ensure the development will deliver high standards of design and green infrastructure. It should also set out detail of layout alternatives, where appropriate, with a justification of the selected option in terms of landscape impact and benefit.

Heritage Landscapes

The ES should include an assessment of the impacts on any land in the area affected by the development which qualifies for conditional exemption from capital taxes on the grounds of outstanding scenic, scientific, or historic interest. An up-to-date list is available at www.hmrc.gov.uk/heritage/lbsearch.htm.

Connecting People with nature

The ES should consider potential impacts on access land, common land, public rights of way and, where appropriate, the England Coast Path and coastal access routes and coastal margin in the vicinity of the development, in line with NPPF paragraph 105. It should assess the scope to mitigate for any adverse impacts. Rights of Way Improvement Plans (ROWIP) can be used to identify public rights of way within or adjacent to the proposed site that should be maintained or enhanced.

Measures to help people to better access the countryside for quiet enjoyment and opportunities to connect with nature should be considered. Such measures could include reinstating existing footpaths or the creation of new footpaths, cycleways, and bridleways. Links to other green networks and, where appropriate, urban fringe areas should also be explored to help promote the creation of wider green infrastructure. Access to nature within the development site should also be considered, including the role that natural links have in connecting habitats and providing potential pathways for movements of species.

Relevant aspects of local authority green infrastructure strategies should be incorporated where appropriate.

Soils and Agricultural Land Quality

Soils are a valuable, finite natural resource and should also be considered for the ecosystem services they provide, including for food production, water storage and flood mitigation, as a carbon store, reservoir of biodiversity and buffer against pollution. It is therefore important that the soil resources are protected and sustainably managed. Impacts from the development on soils and best and most versatile (BMV) agricultural land should be considered in line with paragraphs 187 and 188 of the NPPF. Further guidance is set out in the Natural England [Guide to assessing development proposals on agricultural land](#).

As set out in paragraph 223 of the NPPF, new sites or extensions to sites for peat extraction should not be granted planning permission.

The following issues should be considered and, where appropriate, included as part of the Environmental Statement (ES):

- The degree to which soils would be disturbed or damaged as part of the development
- The extent to which agricultural land would be disturbed or lost as part of this development, including whether any best and most versatile (BMV) agricultural land would be impacted.

This may require a detailed Agricultural Land Classification (ALC) survey if one is not already available. For information on the availability of existing ALC information see www.magic.gov.uk.

- Where an ALC and soil survey of the land is required, this should normally be at a detailed level, e.g. one auger boring per hectare, (or more detailed for a small site) supported by pits dug in each main soil type to confirm the physical characteristics of the full depth of the soil resource, i.e. 1.2 metres. The survey data can inform suitable soil handling methods and appropriate reuse of the soil resource where required (e.g. agricultural reinstatement, habitat creation, landscaping, allotments and public open space).
- The ES should set out details of how any adverse impacts on BMV agricultural land can be minimised through site design/masterplan.
- The ES should set out details of how any adverse impacts on soils can be avoided or minimised and demonstrate how soils will be sustainably used and managed, including consideration in site design and master planning, and areas for green infrastructure or biodiversity net gain. The aim will be to minimise soil handling and maximise the sustainable use and management of the available soil to achieve successful after-uses and minimise off-site impacts.

Further information is available in the [Defra Construction Code of Practice for the Sustainable Use of Soil on Development Sites](#) and

The British Society of Soil Science Guidance Note [Benefitting from Soil Management in Development and Construction](#).

Air Quality

Air quality in the UK has improved over recent decades but air pollution remains a significant issue. For example, approximately 85% of protected nature conservation sites are currently in exceedance of nitrogen levels where harm is expected (critical load) and approximately 87% of sites exceed the level of ammonia where harm is expected for lower plants (critical level of 1µg) ^[1]. A priority action in the England Biodiversity Strategy is to reduce air pollution impacts on biodiversity. The Government's Clean Air Strategy also has a number of targets to reduce emissions including to reduce damaging deposition of reactive forms of nitrogen by 17% over England's protected priority sensitive habitats by 2030, to reduce emissions of ammonia against the 2005 baseline by 16% by 2030 and to reduce emissions of NO_x and SO₂ against a 2005 baseline of 73% and 88% respectively by 2030. Shared Nitrogen Action Plans (SNAPs) have also been identified as a tool to reduce environmental damage from air pollution.

The planning system plays a key role in determining the location of developments which may give rise to pollution, either directly, or from traffic generation, and hence planning decisions can have a significant impact on the quality of air, water and land. The ES should take account of the risks of air pollution and how these can be managed or reduced. This should include taking account of any strategic solutions or SNAPs, which may be being developed or implemented to mitigate the impacts on air quality. Further information on air pollution impacts and the sensitivity of different habitats/designated sites can be found on the Air Pollution Information System (www.apis.ac.uk).

Information on air pollution modelling, screening and assessment can be found on the following websites:

- SCAIL Combustion and SCAIL Agriculture - <http://www.scail.ceh.ac.uk/>
- Ammonia assessment for agricultural development <https://www.gov.uk/guidance/intensive-farming-risk-assessment-for-your-environmental-permit>
- Environment Agency Screening Tool for industrial emissions <https://www.gov.uk/guidance/air-emissions-risk-assessment-for-your-environmental-permit>
- Defra Local Air Quality Management Area Tool (Industrial Emission Screening Tool) – England <http://www.airqualityengland.co.uk/laqm>

Natural England has produced '[*Air pollution and development: advice for local authorities. How to assess sector-specific planning applications that could affect air quality on a protected site*](#)'. This standing advice is to help planning authorities understand the impact on statutory protected sites from particular developments that emit specific air pollutants. The advice covers emissions of ammonia (NH₃), nitrogen oxides (NO, NO₂ or NO_x), nitrogen deposition, acid deposition and sulphur dioxide (SO₂).

The standing advice is Natural England's formal statutory advice and is a material consideration. It provides decision makers with the information needed to fulfil their statutory duties when making decisions on planning applications with potential air pollution impacts.

Water Quality

The planning system plays a key role in determining the location of developments which may give rise to water pollution, and hence planning decisions can have a significant impact on water quality, and land. The assessment should take account of the risks of water pollution and how these can be managed or reduced. A number of water dependent protected nature conservation sites have been identified as failing condition due to elevated nutrient levels and nutrient neutrality is consequently required to enable development to proceed without causing further damage to these sites. If your planning application is affected by Nutrient Neutrality, the ES needs to take account of any strategic solutions for nutrient neutrality or Diffuse Water Pollution Plans, which may be being developed or implemented to mitigate and address the impacts of elevated nutrient levels. These solutions or plans should be relevant to the specific planning consultation site.

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

Further information can be obtained from the Local Planning Authority.

Climate Change

The ES should identify how the development affects the ability of the natural environment (including habitats, species, and natural processes) to adapt to climate change, including its ability to provide adaptation for people. This should include impacts on the vulnerability or resilience of a natural feature (i.e. what's already there and affected) as well as impacts on how the environment can accommodate change for both nature and people, for example whether the development affects species ability to move and adapt. Nature-based solutions, such as providing green infrastructure on-site and in the surrounding area (e.g. to adapt to flooding, drought and heatwave events), habitat creation and peatland restoration, should be considered. The ES should set out the measures that will be adopted to address impacts.

Further information is available from the [Committee on Climate Change's](#) (CCC) [Independent Assessment of UK Climate Risk](#), the [National Adaptation Programme](#) (NAP), the [Climate Change Impacts Report Cards](#) (biodiversity, infrastructure, water etc.) and the [UKCP18 climate projections](#).

The Natural England and RSPB [Climate Change Adaptation Manual](#) (2020) provides extensive information on climate change impacts and adaptation for the natural environment and adaptation focussed nature-based solutions for people. It includes the Landscape Scale Climate Change Assessment Method that can help assess impacts and vulnerabilities on natural environment features and identify adaptation actions. Natural England's [Nature Networks Evidence Handbook](#) (2020) also provides extensive information on planning and delivering nature networks for people and biodiversity.

The ES should also identify how the development impacts the natural environment's ability to store and sequester greenhouse gases, in relation to climate change mitigation and the natural environment's contribution to achieving net zero by 2050. Natural England's [Carbon Storage and Sequestration by Habitat report](#) (2021) and the British Ecological Society's [nature-based solutions report](#) (2021) provide further information.

Contribution to local environmental initiatives and priorities

The ES should consider the contribution the development could make to relevant local environmental initiatives and priorities to enhance the environmental quality of the development and deliver wider environmental gains. This should include considering proposals set out in relevant local strategies or supplementary planning documents including landscape strategies, green infrastructure strategies, tree and woodland strategies, biodiversity strategies or biodiversity opportunity areas.

Manchester Council
By email only

Your ref: EIASCO/25/012
Our ref: DC/25/3121
Date: 03-DEC-25

Dear Planning Team

Location: Site Off Lord Street Manchester

Proposal: Request for Scoping opinion under Part 4, Regulation 15 of The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended)

With reference to the above Scoping Opinion Request (Environmental Impact Assessment), United Utilities (UU) wishes to make the following comments at this early stage regarding the expectations for any future proposals and the scope of any future planning application.

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

- A co-ordinated and holistic approach to the delivery of sustainable **foul and surface water drainage**;
- **Asset protection** for existing water and wastewater infrastructure which is located either in, or in close proximity to the scoping boundary
- **Flood Risk**;

FOUL AND SURFACE WATER DRAINAGE

All development proposals will be expected to fully investigate the hierarchy of drainage options for surface water. There is an expectation at this stage that surface water will not be discharged to the combined sewer network as there are more sustainable options in the vicinity of the site for the proposed development to discharge too. Should infiltration not be feasible at this site, there is an opportunity to discharge surface water to the River Irk which is located to the south of the proposed development site. It is critical that the hierarchy for managing surface water is investigated as soon as possible and prior to progressing the detail of any site design.

Directed by the principles set out in the National Planning Practice Guidance and the new National Standards for Sustainable Drainage Systems (2025) we require developers and Local Planning Authorities, to do all that they can to avoid surface water entering the public sewer,

unless absolutely necessary. This applies to all proposed development. See Appendix 1.1 'Surface Water Hierarchy'. All options for the sustainable management of surface water must be thoroughly investigated. Where a new surface water connection to the public sewer is proposed, we will require robust evidence to demonstrate the drainage hierarchy has been fully investigated and there are no more sustainable options available for the management of surface water.

It is essential that a detailed, site-wide foul and surface water drainage strategy is prepared to inform any future full or outline planning applications at this site. The foul and surface water strategy should fully assess site topography, infiltration potential, all forms of flood risk, existing water features and naturally occurring flow paths to identify where water will naturally accumulate and determine whether pumping may be required. Resultant layouts and levels should take account of such existing circumstances to ensure the most flood resilient solution is achieved.

The applicant must demonstrate an understanding of how foul and surface water infrastructure will be delivered as part of any future application for the site. There is an expectation for any future planning submission to provide foul and surface water drainage discharge details, including an acknowledgement for future infrastructure requirements to support any proposed development. The applicant should also be aware contaminated groundwater will not be accepted by United Utilities into the public sewer network. This is outlined in the Water Industry Act (1991).

Rights to Discharge to Watercourse or Other Receiving Water Body

Should surface water be unable to infiltrate at this site, we request that all land that is necessary to facilitate a discharge to a watercourse is fully identified within any future submission. The proposal must benefit from the requisite rights of discharge to more sustainable alternatives than the public sewer for the management of surface water, e.g., a right to discharge to a water course or other water body. Acquiring the right to discharge / changing permit details can be both a lengthy and costly exercise.

Please note, United Utilities is not responsible for advising on rates of discharge to the local watercourse system. This is a matter for discussion with the Lead Local Flood Authority and / or the Environment Agency (if the watercourse is classified as main river).

UNITED UTILITIES' PROPERTY, ASSETS AND INFRASTRUCTURE

Water mains are located in close proximity to the scoping boundary. Water mains, and their associated easements, must be considered as part of the detailed design process. They must not be built over, nor have our access compromised. To discuss the implications of any future development proposal on our water assets, the applicant can engage early dialogue via DeveloperServicesWater@uuplc.co.uk.

A public sewers is located within the scoping boundary. United Utilities will not allow buildings to be located in close proximity to our sewers. The applicant is advised to contact United Utilities

to discuss how the presence of wastewater infrastructure within the site may impact upon the design and layout of any subsequent proposals. The applicant can contact SewerAdoptions@uuplc.co.uk to discuss this.

Our assets will need to be fully considered as part of the design process, with the potential impacts identified at an early stage and suitable mitigation and protection measures and/or diversions incorporated into the design, construction and ongoing operation of the application site. We recommend any future outline of full planning application submissions include a detailed site wide layout plan which confirms the proven location of existing UU assets and infrastructure in relation to the proposed development. In addition, proposed drainage, layouts and levels are intrinsically linked and is therefore important that a holistic approach is achieved which avoids piecemeal infrastructure delivery whilst ensuring the most sustainable and cost effective drainage solution is achieved.

Where United Utilities assets exist, the level of cover to United Utilities pipelines and apparatus must not be compromised either during or after construction and there should be no additional load bearing capacity on pipelines without prior agreement from United Utilities. This would include earth movement and the transport and position of construction equipment and vehicles. Consideration should also be applied to United Utilities assets which may be located outside the applicant's red line boundary.

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

Any agreement to divert our underground assets will be subject to a diversion application, made directly to UU. We will not guarantee, or infer acceptance of, a proposed diversion through the planning process (where diversion is indicated on submitted plans). If an application to divert or abandon underground assets is submitted to UU and subsequently rejected (either before or after the determination of a planning application), applicants should be aware that they may need to amend their proposed layout to accommodate UU's assets.

FLOOD RISK

Existing drainage systems are often dominated by combined sewers. This method of sewer infrastructure is a result of the time it was constructed, with combined sewers taking both foul and surface water. If there is a consistent approach to surface water management, it will help to manage and reduce surface water entering the sewer network, decreasing the likelihood of flooding from sewers, the impact on residents and businesses, and the impact on the environment.

Whilst UU does all that it can to reduce the risk of flooding, there remains a residual risk, which is a source of flooding that should be considered in the EIA. National policy is clear that flood risk from all sources, including sewers and reservoirs, must be considered in the delivery of new

development. As such, it is important to ensure that the assessment of flood risk includes sewer and reservoir flood risk. It should be ensured that the proposed development does not result in an increase in flood risk from the public sewer or from reservoirs as a result of:

1. any proposed new drainage connections to the public sewer;
2. any changes in land or property which could materially change existing flood risk, for example, by altering any existing exceedance flood paths of losses from the public sewer; surface water flows, or a reservoir exceedance path;
3. by locating any above ground elements of the proposal in areas where there is an existing risk of sewer or reservoir flooding; or
4. any diversions / works to watercourses or existing sewers which could materially affect hydraulic performance and therefore change / increase any risk of flooding.

WATER EFFICIENCY

We request that the development considers how water efficiency measures can be incorporated into the future detailed design of the site. There are opportunities such as rainwater recycling and water butts and we would encourage the LPA to embrace all water efficiency measures. Modern design techniques can promote measures for water recycling to reduce the impact on infrastructure requirements.

Water efficiency should be a fundamental component of any approach to carbon neutrality and we request that you clearly set out your water efficiency and sustainable drainage expectations in the delivery of new development at this site. A tighter water efficiency standard in new development has multiple benefits including a reduction in water and energy use, as well as helping to reduce customer bills. Water efficiency is therefore a key component of your journey to carbon neutrality.

Local planning authorities have the option to set additional technical requirements in respect of water use for the construction of new build dwellings, exceeding the minimum standards required by Building Regulations. All new homes are required to meet the mandatory national standard of 125 litres of water used per person per day as set out in Building Regulations Approved Document G. Where there is a clear local need, a local planning authority's development plan policies can require new-build dwellings to meet the tighter Building Regulations optional requirement of 110 litres of water used per person per day. If your adopted development plan includes a policy that implements the tighter water efficiency standard for new-build dwellings in Part 3 of Building Regulations, you should ensure that this is a condition of any planning permission you may grant. As this is a matter for the local planning authority / building control body, United Utilities would not be involved in the discharge of conditions relating to water efficiency.

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

We request that a copy of this letter is made available to the future applicant.

Yours faithfully
United Utilities' Planning Team

APPENDIX:
Supporting information for the decision maker, applicant, developers and any other interested party

Whilst we provide the following information to support the design and delivery of the proposed scheme, we strongly recommend that the applicant, or any subsequent developer, contacts our Developer Services team or visits our website for more detailed advice on any aspects of United Utilities' assets and services that might impact their proposal. Full contact details can be found in Section 5.0 'Contacts' (below).

1.0 DRAINAGE DESIGN

Surface water (rainwater) flows are very large when compared with foul water flows that come from toilets, showers, washing machines, etc. It is usually surface water flows that increase the risk of sewer flooding, potentially impacting homes and businesses, and can result in unwanted spills from storm overflows into watercourses.

We have embarked on an ambitious investment programme to improve the performance of our wastewater network, particularly relating to the management of surface water. Our focus is to reduce the risk of sewer flooding and the prevention, frequency and intensity of spills from storm overflows, ultimately moving to a position where they are no longer necessary. As we work hard to improve the existing wastewater network, it is important that we do not compromise the results by accepting any unnecessary new surface water connections and that we take all opportunities for the removal of existing flows.

1.1 Surface water hierarchy

The design and delivery of surface water drainage systems must be in accordance with the National Standards for Sustainable Drainage Systems or any replacement of national standards. Full details, including the hierarchy of surface water runoff destinations can be found here: [National standards for sustainable drainage systems \(SuDS\) - GOV.UK](#)

The standards indicate that surface water drainage systems shall be designed, constructed, maintained and operated following a natural approach to managing water. This should mimic natural drainage, manage surface runoff at or close to the surface and as close to its source as practicable.

Therefore, drainage proposals for new development must be designed to maximise the retention of surface water on-site and minimise the volume and rate of surface water discharge off-site. Where surface water connections already exist, the applicant must provide clear evidence of these connections along with calculations on rates of discharge, to demonstrate a reduction in discharge rates. Without this evidence, applicants will be required to discharge at a greenfield rate of run-off.

United Utilities will only accept new surface water connections to the public sewer in circumstances where the applicant has provided robust evidence that the drainage hierarchy has been fully investigated and more sustainable options for the management of surface water

have been proven to be unfeasible. Surface water connections, particularly to the combined sewer, should only be considered as the last resort.

1.2 Adoption and construction of drainage systems

If the applicant intends to offer wastewater assets forward for adoption by United Utilities, their proposed detailed design will be subject to a technical appraisal by our Developer Services team and must meet the requirements outlined in 'Sewerage Sector Guidance Appendix C – Design and Construction Guidance v2-2' dated 29 June 2022 or any subsequent iteration. This is important as drainage design can be a key determining factor of site levels and layout.

If the proposal incorporates a SuDS component(s) which interacts with a sewer network that may be offered for adoption by United Utilities, we recommend the applicant seeks further advice regarding the SuDS design; detailed information is available on our website.

Our acceptance of any drainage strategy submitted by an applicant to the Local Planning Authority for approval does not infer that a detailed drainage design will meet the requirements for a successful adoption application. We strongly recommend that no construction commences until the detailed drainage design has been submitted directly to United Utilities, assessed and accepted in writing. Any work carried out prior to the technical assessment being approved is done entirely at the developer's own risk and could be subject to change.

2.0 PLANNING CONDITIONS; OUR APPROACH TO DRAINAGE CONDITIONS

When appropriate, United Utilities will request planning conditions relating to site drainage. This is important to ensure the delivery of quality drainage design for both new and existing customers. There is also a particular focus on the sustainable management of surface water thorough investigation of the drainage hierarchy which is critical in the management of flood risk and to reduce the frequency and intensity of spills from storm overflows, which is a shared priority for both United Utilities and the customers and communities that we serve.

2.1 Drainage design

In scenarios where **all** relevant information regarding drainage design is available; the design is acceptable and all opportunities for the sustainable management of surface water have been fully investigated, we will usually request a compliance condition to enable the delivery of the proposed design. If **any** relevant information is missing, or where there is insufficient evidence to demonstrate that the drainage hierarchy has been fully investigated, we will request a pre-commencement condition to ensure that all aspects of drainage design are fully considered before any work begins on site.

2.2 Management and maintenance of Sustainable Drainage Systems (SuDS)

The Local Authority should consider a SuDS management and maintenance condition for any scheme where SuDS is included within the proposal. An example condition is below that may be suitable in many circumstances.

Prior to occupation of the development a sustainable drainage management and maintenance plan for the lifetime of the development shall be submitted to the local planning authority and agreed in writing. The sustainable drainage management and maintenance plan shall include as a minimum:

- (i) Arrangements for adoption by an appropriate public body or statutory undertaker, or management and maintenance by a resident's management company; and*
- (ii) Arrangements for inspection and ongoing maintenance of all elements of the sustainable drainage system to secure the operation of the surface water drainage scheme throughout its lifetime.*

The development shall subsequently be completed, maintained and managed in accordance with the approved plan.

Reason: To ensure that management arrangements are in place for the sustainable drainage system in order to manage the risk of flooding and pollution during the lifetime of the development.

It is important to note that United Utilities cannot provide comment on an asset that is owned by a third-party management and maintenance company and therefore, would not be involved in any application to discharge a condition relating to SuDS management and maintenance.

3.0 UNITED UTILITIES' PROPERTY, ASSETS AND INFRASTRUCTURE

3.1 Water pipelines

United Utilities will not allow building over or in close proximity to a water main.

For any works in the vicinity of water pipelines, including drainage, the applicant must comply with our 'Standard Conditions for Works Adjacent to Pipelines', which can be found on our website: [Working near our pipes - United Utilities](#)

3.2 Wastewater pipelines

United Utilities will not allow any new buildings or structures to be erected over or in close proximity to a public sewer or any other wastewater pipeline. This will only be reviewed in exceptional circumstances.

Nb. Proposals to extend domestic properties either above, or in close proximity to a public sewer will be reviewed on a case by case basis by either by a building control professional or following a direct application to United Utilities (see our website for further details).

3.3 Water and wastewater pipelines and apparatus

A number of providers offer a paid for mapping service, including United Utilities. Alternatively, the plans can be viewed for free. See Section 5.0 'Contacts' for further details.

The position of underground apparatus shown on water and wastewater asset maps is approximate only and is given in accordance with the best information currently available. The

actual positions may be different from those shown on the plans and private pipes, sewers or drains may not be recorded. We strongly recommend the applicant, or any future developer, does not rely solely on the asset maps to inform decisions relating to the detail of their site and instead investigates the precise location of any underground pipelines and apparatus.

Where additional information is requested to enable an assessment of the proximity of proposed development features to United Utilities assets, the proven location of pipelines should be confirmed by site survey; an extract of asset maps will not suffice. The applicant should seek advice from our Developer Services team on this matter. See Section 5.0. 'Contacts' (below). United Utilities Water PLC will not accept liability for any loss or damage caused by the actual position of our assets and infrastructure being different from those shown on asset maps.

Developers should investigate the existence and the precise location of water and wastewater pipelines as soon as possible as this could significantly impact the preferred site layout and/or diversion of the asset(s) may be required. Unless there is specific provision within the title of the property or an associated easement, any necessary disconnection or diversion of assets to accommodate development, will be at the applicant/developer's expense. In some circumstances, usually related to the size and nature of the assets impacted by proposals, developers may discover the cost of diversion is prohibitive in the context of their development scheme.

Any agreement to divert our underground assets will be subject to a diversion application, made directly to United Utilities. This is a separate matter to the determination of a planning application. We will not guarantee, or infer acceptance of, a proposed diversion through the planning process (where diversion is indicated on submitted plans). In the event that an application to divert or abandon underground assets is submitted to United Utilities and subsequently rejected (either before or after the determination of a planning application), applicants should be aware that they may need to amend their proposed layout to accommodate United Utilities' assets.

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

Any construction activities in the vicinity of United Utilities' assets, including any assets or infrastructure that may be located outside the applicant's red line boundary, must comply with national building and construction standards and where applicable, our 'Standard Conditions for Works Adjacent to Pipelines', which can be found on our website: [Working near our pipes - United Utilities](#).

The applicant, and/or any subsequent developer should note that our 'Standard Conditions' guidance applies to any design and construction activities in close proximity to pipelines and apparatus that are no longer in service, as well as pipelines and apparatus that are currently in operation. This advice is also relevant to any uncharted pipelines (pipelines that do not appear on our asset maps) that might be discovered on site either before or during construction. In this

instance, the developer should contact our Developer Services team as soon as possible. See Section 5.0 'Contacts'.

It is the applicant's responsibility to ensure that United Utilities' required access is provided within any proposed layout and that our infrastructure is appropriately protected. The developer would be liable for the cost of any damage to United Utilities' assets resulting from their activity.

4.0 WATER AND WASTEWATER SERVICES, METERING AND CHARGES

If the applicant intends to receive water and/or wastewater services from United Utilities they should visit our website or contact the Developer Services team for advice at the earliest opportunity. This includes seeking confirmation of the required metering arrangements for the proposed development. See Section 5.0 'Contacts' (below).

If the proposed development site benefits from existing water and wastewater connections, the applicant should not assume that the connection(s) will be suitable for the new proposal or that any existing metering arrangements will suffice. In addition, if reinforcement of the water network is required to meet potential demand, this could be a significant project and the design and construction period should be accounted for.

In some circumstances a water meter must be installed to premises. Detailed guidance on whether the development will require a compulsory meter is available on our website within our published Charges Schemes; [Our household charges 2025/2026 | United Utilities](#) (Section 8.7).

To avoid any unnecessary costs and delays being incurred by the applicant or any subsequent developer, we strongly recommend the applicant seeks advice regarding water and wastewater services and metering arrangements, at the earliest opportunity. See Section 5.0 'Contacts'.

To promote sustainable development United Utilities offers a reduction in infrastructure charges to applicant's delivering water efficient homes and draining surface water sustainably (criteria applies). Further information can be found on our website: [Sustainability - United Utilities](#)

Business customers can find additional information on our sustainable drainage incentive scheme at [Incentive schemes | United Utilities](#)

5.0 CONTACTS

Contact our **DEVELOPER SERVICES** team as follows:

Website (including 'Live Chat'): [Building & Developing - United Utilities](#)

Email:

WATER (water mains, supply and metering): DeveloperServicesWater@uuplc.co.uk

WASTEWATER (public sewers and drainage): SewerAdoptions@uuplc.co.uk

SLUDGE PIPELINES: DeveloperServicesWater@uuplc.co.uk

Telephone (Monday-Friday, 8am-6pm): **0345 072 6067**

GROUNDWATER PROTECTION ZONES:

Where the proposed site is located in a Groundwater Source Protection Zone, the applicant should contact our Engineering team for advice, by email at Groundwater@uuplc.co.uk

PROPERTY SEARCHES (FOR ASSET MAPS):

The public water and sewer records can be viewed via our online viewing facility for free. Viewings are by appointment only. Email propertysearches@uuplc.co.uk or call **0370 751 0101** to book an appointment.

Alternatively, a number of providers offer a paid for mapping service including United Utilities. For more information, or to purchase a sewer and water plan from United Utilities, please visit [Property Searches | United Utilities](#)

UNITED UTILITIES LEGAL SERVICES (FOR EASEMENT DOCUMENTS):

Copies of relevant deeds may be purchased from United Utilities Legal Services. This information is also available from Land Registry.

To purchase a copy of easement documents from United Utilities, please email: LegalServices@uuplc.co.uk



EIASCO/25/012. Lord Street scoping opinion

From [REDACTED]
Date Wed 12/3/2025 11:10 AM
To Emily Booth [REDACTED]

Hiya Emily

Please see response to the above scoping opinion.

Air Quality – To be scoped out which we can accept.

The Scoping Opinion includes an AQ assessment prepared by Redmore dated 16th October 2025 reference 9835r1 which I have reviewed and I can accept the content. This should be submitted with the application for a formal response. Mitigation measures have been recommended in table 15 for control of fugitive dust emissions during the demolition and construction process and these measures will need to be directly included within the contractors CMP.

Ground Conditions – To be scoped out which we accept.

We will recommend a condition regarding ground conditions which we will review and provide comment on when it has been submitted with the application.

Noise and vibration – To be scoped out which we accept

We will recommend a condition with regard to insulation of the residential buildings to protect against noise from external environment which will also require an AVO overheating assessment and internal noise criteria will be stipulated in the condition. We will also recommend a condition with regard to any fixed plant, including any plant located within louvred plant rooms and / or behind louvred extract/ intake. Plant will need to be selected and / or mitigated so not to exceed 5dB below the LA90 at the nearest receptors. Receptors will include newly introduced receptors at the site, neighbouring residential and any neighbouring commercial properties.

Outside of the above, at this stage we will likely recommend conditions with regard to a demolition and construction management plan. The CMP will need to include the construction phase dust mitigation measures that will be recommended in table 15 of the Redmore AQ assessment dated 16th October 2025 reference 9835r1 and will need to include a section on noise and vibration, consultation and complaints and a section confirming the site hours (Monday to Friday 07:30 to 18:00, Saturday 08:30 to 14:00 and no work Sunday and Bank Hols)

We will also recommend a condition with regard to residential waste. The developer will need to review the MCC GD04 document with regard to the necessary requirements for residential waste. It is essential that suitable refuse space is provided to meet the criteria and that the domestic waste collection proposals meet the criteria in GD04 and comply with the MCC waste collection regime. Schemes that do not fully comply with the criteria in this document will not be accepted so it is essential that the developer fully reviews this document and develops the waste strategy to meet the requirement at this stage of development.

There may be other conditions or other comments additional to the above once the full application and assessments have been submitted. The applicant should also review our online Planning Technical guidance documents before completing and submitting the above technical reports.

Kind regards

[REDACTED]

[REDACTED]

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

email: [REDACTED]

website: www.manchester.gov.uk

Tel: [REDACTED]

Internal: [REDACTED]

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Application details:	The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended) (the "EIA" Regulations) Reference: EIASCO/25/012 Location: Site Off Lord Street Manchester
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LLFA Comments 19/12/2025

The following Information has been considered:

Planning Portal uploads:	21/11/2025
Further submission emails:	N/A
Pre-Application Advice:	N/A

Any LLFA Comments to LPA

The site is located within Flood Zone 1, and the proposals are a major development with a flood risk vulnerability of 'More Vulnerable'.

The proposed EIA scoping out of flood risk is accepted on the basis of the project commitments as defined in the following sections:

- **Commitment to provision of a standalone Flood Risk Assessment and Drainage Strategy to support the Planning application (Section 6.4, page 32 and Section 7.2.13 – 7.2.14).**

A Flood Risk Assessment and Drainage Strategy must be submitted to support the Planning Application. This should demonstrate design compliance with national and local policy.

Proposals for surface water attenuation are to align with the Manchester, Trafford and Salford Strategic Flood Risk Assessment. For brownfield sites a minimum of 50% betterment is required for reduction in runoff rate compared to the existing rates with the aim of reducing to the Greenfield runoff rates.



EIASCO/25/012 - Site off Lord Street

From [REDACTED]

Date Thu 12/18/2025 1:09 PM

To Emily Booth [REDACTED]

Cc [REDACTED]

Hi Emily,

I hope you are well! Just a quick email to let you know that there may be a delay in the Highways response on this application.

We are just waiting for TfGM response to come through. I am hoping that it may come through today in which case I will submit before I finish tomorrow. I am aware that they have had a few delays due to strikes, leave and staff availability.

If I don't speak to you before have a lovely break and a wonderful Christmas and New Year!

[REDACTED]

[REDACTED]
Development Control Engineer
Highways Development Control
Neighbourhoods Directorate

Please Note my Working Hours: Mon - Fri 08:00 - 16:00

Email: [REDACTED]

Phone Number: [REDACTED]

Web: <http://www.manchester.gov.uk>

POSTAL ADDRESS: Manchester City Council, The Highways Service, PO Box 532, Town Hall, Manchester, M60 2LA



Out of Office:

Annual Leave: December 20th – January 4th. Return January 5th 2026.

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Memorandum

To Emily Booth

From [REDACTED]

Date 5 January 2026

Subject **EIASCO/25/012**

Request for Scoping opinion under Part 4, Regulation 15 of The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended).

We have reviewed the above application in relation to highways and our comments are as follows:

Context:

The proposals include a 23-storey tower with a 935 sqm basement, delivering 221 residential units in a mix of one- and two-bedroom apartments and townhouses. Four townhouses will be located at ground level, while the remaining floors will accommodate 217 apartments. The development is designed to be car-free and will feature dedicated cycle facilities within the basement.

Document Submission

Documents required at the planning stage should include:

- o Transport Statement / Assessment
- o Travel Plan
- o Waste Management Strategy
- o Service Management Strategy
- o Delivery Management Strategy
- o Construction Environmental Management Plan

A Stage 1 RSA should also be provided at planning stage for any proposed changes/reconfiguration of the highway network.

The applicant/consultants should engage with neighbouring sites where necessary and ensure a cohesive proposal.

EIA Transport Chapter - Highways Scoping Response:

The Scoping Report identifies that during the operational phase, potential environmental effects will primarily relate to traffic generated by the development. An initial trip assessment was undertaken, with anticipated two-way trips shown in Table 7.1.

The assessment forecasts 11 two-way vehicle trips during the AM peak and 15 during the PM peak, alongside pedestrian movements of approximately 130 two-way person trips in the AM peak and 68 in the PM peak.

According to 2024 DfT data, Cheetham Hill Road carries 17,029 vehicles daily, so the additional trips are not expected to raise highway concerns.

The Scoping Report confirms that the demolition and construction phases will temporarily increase traffic on the local road network due to contractor movements, machinery, and a short-term rise in HGV activity.

At this stage, the exact number of construction-related trips is unknown and will depend on phasing and timings set by the principal contractor. However, the Scoping Note anticipates traffic levels similar to other local developments, with an estimated peak of 30 two-way HGV trips, representing a 26% increase compared to 2024 average flows (223 HGVs).

Under ISEP guidelines, a temporary HGV uplift of under 30% on non-sensitive roads does not require EIA assessment.

To mitigate potential impacts during construction, a Traffic Logistics Plan or equivalent will be implemented and managed through the Construction Environmental Management Plan.

The preliminary findings indicate that the development will not exceed IEMA significance or screening thresholds for traffic impact. Consequently, transport has been scoped out of the EIA, which Highways considers acceptable.

It is requested that each sites applicant / transport consultant engage with pre-application discussions with Highways.

Please note that the EIA and submitted Transport Statement / Assessment will need to consider the Holcroft Moss SPD.

Construction Management:

During the construction phase of the proposed development, construction traffic management measures will be implemented through a CEMP, which will be secured by planning condition.

The construction of the site could result in the closure of roads and footpaths, physical works within the highway to form new site access points, layout improvements, service upgrades and the need to accommodate regular deliveries of materials and construction equipment. It is acknowledged that the precise nature of the construction related highway effects are difficult to identify in detail until a final construction programme and delivery phasing plan has been undertaken.

It is recommended that the applicant has early engagement with MCCs Event and Network Management Team and work closely to safely manage highway and pedestrian safety during the construction phase.

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

The EIA and following CEMP should identify any mitigation measures necessary to address any significant effects during the construction phase of the proposed development.

MCC Highways would also request that a Construction Environmental Management Plan is conditioned with any planning approval. It is therefore recommended that the CEMP is updated to incorporate the following which are usually required within a CEMP which would work to further reduce environmental impacts:

- o The duration/phasing of construction works and associated vehicle trips;
- o Routing of construction traffic and associated swept-path assessment;
- o Details of the location and arrangements for contractor parking;
- o The identification of the vehicular access points into the site;
- o Traffic Management measures for vehicles, pedestrians and cyclists;
- o Manage and coordinate construction activities with reference to ongoing/imminent construction works in the locality:
- o Identify measures to control dust and mud including on the surrounding public highway including details of how the wheels of contractor's vehicles are to be cleaned during the construction period;
- o The details of an emergency telephone contact number for the site contractor to be displayed in a publicly accessible location; and
- o Highway dilapidation survey including photographs and commentary on the condition of carriageway/footways on construction vehicle routes surrounding the site.

The Applicant should also note that MCC Highways also require information on proposed outline electricity/utility connection works and associated traffic management proposals prior to determination. This should be included within the submitted Transport Statement / Assessment and also assessed as part of the EIA scoping process.

It is understood that upper-levels of the building will overhang the forecourt area/footway below and may therefore be subject to an Oversail license. It should be ensured that such overhang provides a minimum headway clearance of 2.3 metres, with at least 450mm clearance from the edge-of-carriageway. Additional consideration must be made with regard to the building overhang at the north-eastern and north-western corners of the building within the vicinity of the Fernie Street and Cheetham Hill Road junctions, and impacts of HGVs manoeuvring across both junctions.

Detailed structural drawings and calculations regarding the proposed overhang must be submitted for checking (for a fee) to MCC Structures Section.

Highways Reference: 17871/FO/2025