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Your Ref: 142552/FO/2025
Our Ref: 17488a

DWD

69 Carter Lane
London
EC4V 5EQ

Mr Jack Navan (Planning Officer)
Planning and Regeneration
Manchester City Council
P O Box 532
Manchester
M60 2LA

Dear Jack,

TOWN AND COUNTRY PLANNING ACT 1990 (AS AMENDED): APPLICATION FOR PLANNING PERMISSION AT NCP CAR PARK, SACKVILLE STREET, MANCHESTER M1 3LY

PLANNING COVERING STATEMENT

We hereby submit an application for full planning permission for the proposed development set out below at the above site:

“Site alterations comprising the installation of drainage infrastructure, plant and associated works to facilitate Electric Vehicle charging infrastructure”

This application is supported by the following documents that should be read in conjunction with this statement:

- Application Form including Certificate of Ownership;
- Sustainable Drainage Strategy prepared by EirEng;
- Plant Noise Data and Specification prepared by Wilson Power Solutions; and
- Noise Impact Assessment prepared by Tetra Tech.

In addition, the following drawings have been submitted with the application to illustrate the proposed scheme.

Table 1.1 – Application Drawings

Plan Title	Plan Reference
Location Plan	2001-S3-P4
Existing Site Plan	2002-S3-P4
Proposed Site Plan	2003-S3-P7
Bloom Street Site Elevation (Existing and Proposed)	2007-S3-P5

Substation Details	2006-S3-P6
Proposed Drainage Plan	242037-ECE-ZZ-XX-DR-C-5210 P9
Existing Topo Contours Plan	242037-ECE-ZZ-XX-DR-C-9010 Rev PL3

Site Location and Description

The application site is located circa 420 meters to the north east of Manchester Oxford Road Railway Station, located between Major Street, Sackville Street, Bloom Street and Abingdon Street.

The application site comprises of an existing surface level car park operated by NCP. The application site is accessed to the south east via Bloom Street by vehicles and pedestrians. The application boundary comprises of the hard standing area within the NCP car park.

Planning History

The site has limited planning history. A review of the online planning register map search function identifies the application site has been used as a public car park since the 1970s.

Proposed Development

This application seeks to make minor amendments to an existing car park site to enable the conversion of 23 parking bays to Electric Vehicle (EV) charging bays capable of charging an electric vehicle while parked within the space. This works sought under this application comprise the following:

- Installation of three structures associated with a new substation, LV Switchroom and 2 no. Kempower Units and associated infrastructure and fencing;
- Installation of surface water drainage infrastructure.

The EV chargers in terms of location and style (wall mounted or freestanding post) have been shown on the proposed site plans for context, as the installation of EV charging infrastructure and conversion of normal bays provides the justification for the proposed works listed above, however planning permission is not sought for the chargers on the basis that this infrastructure benefits from Permitted Development rights.

Table 1.2 sets out compliance with the Permitted Development criteria within the Town and Country Planning (General Permitted Development) (England) Order 2015 (as Amended):

Table 1.2 – GPDO Charger Review

Criteria	Specification	Compliance Y/N
Class D - The installation, alteration or replacement, within an area lawfully used for off-street parking, of an electrical outlet mounted on a wall for recharging electric vehicles.		
Outlet and casing size is below 0.2 cubic metres	The outlet, casing and packaging is below 0.1 cubic metre	Yes
Does not face onto or is within 2m of a highway	The chargers are all located within the basement car park at least 2 metres from the public highway.	Yes

Is not within a site designated as a scheduled monument	The Site is not a designated scheduled monument	Yes
Is not within the curtilage of a listed building	The Site is not within the curtilage of a listed building	Yes
Class E – The installation, alteration or replacement, within an area lawfully used for off-street parking, of an upstand with an electrical outlet mounted on it for recharging electric vehicles.		
The upstand and outlet are below 2.3 metres in height	Upstand and outlet are a maximum height of 1.75 metres	Yes
Is not within 2 metres of a highway	The chargers are all located within the basement car park at least 2 metres from the public highway	Yes
Is not within a site designated as a scheduled monument	The Site is not a designated scheduled monument	Yes
Is not within the curtilage of a listed building	The Site is not within the curtilage of a listed building	Yes
Does not result in more than 1 upstand per parking space	The upstands serve 2 parking spaces	Yes

The Applicant would be happy to accept a condition securing the EV provision and would suggest the following wording:

“In the event that the proposed EV infrastructure falls outside the parameters of permitted development rights, details shall be submitted to the Local Planning Authority for written approval prior to installation.”

The plans also show the removal of car parking spaces, however planning permission is not sought for the amendments to the white lining proposed, as this does not constitute ‘development’ as defined by Section 55(2) of the TCPA.

Relevant Planning Policy

Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that, if regard is to be had to the development plan for the purpose of determining planning applications, then determination must be made in accordance with the development plan, unless material considerations indicate otherwise. The relevant statutory development plan for the area for the purpose of this application comprises the below document:

- Places for Everyone Joint Development Plan Document for Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Tameside, Trafford and Wigan 2022 to 2039 (March 2024) (‘Places for Everyone’); and
- Manchester Core Strategy 2012 – 2027 (July 2012) (inc. the Addendum to the Core Strategy; March 2024).

There are no emerging policies or Neighbourhood Plans to consider.

This section sets out the national and local planning policies relevant to the proposals that seek to achieve sustainable development, build a strong, competitive economy, achieve good design, conserve and enhance the natural environment, promote safe and sustainable transport, and meet the challenge of climate change and flooding.

The interactive Proposals Map accompanying the Local Plan identifies the application site has no allocations for redevelopment. It does however fall within the wider allocation associated with the Manchester City Centre area specific policies.

Places for Everyone (March 2024)

Policy JP-S1 (Sustainable Development) states that to help tackle climate change, development should aim to maximise its economic, social and environmental benefits simultaneously, minimise its adverse impacts, utilise sustainable construction techniques and actively seek opportunities to secure net gains across each of the different objectives.

Policy JP-S5 (Clean Air) states a comprehensive range of measures will be taken to support improvements in air quality, focusing particularly on locations where people live, where children learn and play, where there are impacts on the green infrastructure network and where air quality targets are not being met, including: significantly expanding the existing commercial network of electric vehicle charging points, both for public and private use, including as part of new developments.

Policy JP-C8 (Transport Requirements of New Development) seeks to promote the increased provision of ULEV charging infrastructure including meeting any standards set by local plans.

Policy JP-S2 (Carbon and Energy) outlines the aim of delivering a carbon neutral Greater Manchester no later than 2038, with a dramatic reduction in greenhouse gas emissions will be supported..

Core Strategy (July 2012)

Policy CC 9 (Design and Heritage) outlines design will need to be of the highest standard in terms of appearance and function

Policy T 1 (Sustainable Transport) sets out the Council will support proposals that facilitate modes of transport that reduce carbon emissions e.g by incorporating charging points for electric vehicles, subject to their appropriate design and location.

Policy DM 1 (Development Management) states that development should have regard to the effects on amenity, including privacy, light, noise, vibration, air quality, odours, litter, vermin, birds, road safety and traffic generation. This could also include proposals which would be sensitive to existing environmental conditions, such as noise.

Material Considerations

National Planning Policy Framework (NPPF) (December 2024)

The NPPF sets out the Government's planning policies for England and how they should be applied. Paragraph 8 specifies that the purpose of the planning system is to contribute to the achievement of sustainable development through 3 overarching objectives, which should be delivered through the preparation and implementation of plans and the application of the NPPF policies:

- An economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;
- A social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and
- An environmental objective – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

At the heart of the NPPF is a presumption in favour of sustainable development, which should be applied by approving development proposals that accord with an up-to-date development plan without delay (paragraph 11c).

Summary

The key planning policy issues relating to this Site are:

- Principle of development;
- Surface Water Drainage; and
- Neighbouring amenity.

Planning Assessment

Principle of Development

The Site is an existing operational public car park. The proposals are for minor works associated with the infrastructure required for the conversion of 23 no. car parking bays to allow electric cars to charge whilst parked.

Places for Everyone Policy JP-C8 and JP-S5, and Core Strategy Policy T1 promotes the increased provision of EV charging infrastructure, which is the driver behind the works proposed within this planning application, and as such should be supported in line with the City's aspirations. Policy JP-S2 also supports the use of electric vehicles including electric vehicle charging points. The policy also seeks to ensure that developments incorporate adequate provision for now and the future to support long term demand.

As such, this new infrastructure will contribute towards delivering national priorities and locally identified requirements in accordance with the Places for Everyone policies outlined above.

Surface Water Drainage

There is currently no surface water drainage at the Site. New drainage infrastructure is therefore proposed to manage the surface water, which proposes to drain surface water via a manhole to the east of the car park as shown on the plan. The installation of a sustainable surface water strategy complies with Policy JP-S4 which seeks to manage flood risk and the water environment. It is noted that the Site and surrounding area is in Flood Zone 1, so no Flood Risk Assessment has been provided.

Neighbouring Amenity

The physical design of the proposed works will not impact the neighbouring amenity as a result of the development given the distance from the nearest residential dwelling.

Core Strategy Policy DM 1 confirms that development should have regard to the effects on amenity, including noise and vibrations. The specification of the noise generating external plant including noise data has been provided with this planning application which confirms there shall be limited acoustic impact from the proposals. The proposals shall also contribute towards achieving the AQMA objectives given it shall promote the use of low emission vehicles within the City Centre.

Considering visual amenity, the proposed infrastructure form, scale and materials are appropriate to the characteristics of the local area comprising of surface level car parking and is appropriate to the function of the application site. The external plant has been positioned in the corner of the site to help minimise visual clutter. As such, the proposals are considered to be in accordance with Core Strategy Policy CC 9.

Considering noise, the Noise Impact Assessment demonstrates the nearest sensitive receptors will be more than 5 dB below the lowest background sound level which complies with the requirements of Manchester Core Strategy and therefore no further mitigation measures are required as it is unlikely to give rise to adverse noise impacts at the nearest receptors.

The proposed works are minor and given the application site is within the existing car park and proximity away from residential development, is considered that that the proposed works to the site will not have a detrimental impact on local amenity.

Conclusion

The proposed development at the existing car park complies with the relevant policies in the development plan and should be supported by the Local Authority. The provision of EV charging facilities should be given substantial weight in terms of providing a sustainable option for those driving within Manchester City Centre and should be afforded significant weight.

The impacts on neighbouring amenity have been taken into account, and the submitted plant specification and noise data for noise generating plant confirm the development proposal would not cause negative impacts on the neighbouring amenity in proximity to the Site.

All key planning considerations have been considered in the preparation of the development proposals, which comply with national and local Development Plan policies.

Yours sincerely,



Charlie Merry
Associate Director
DWD

