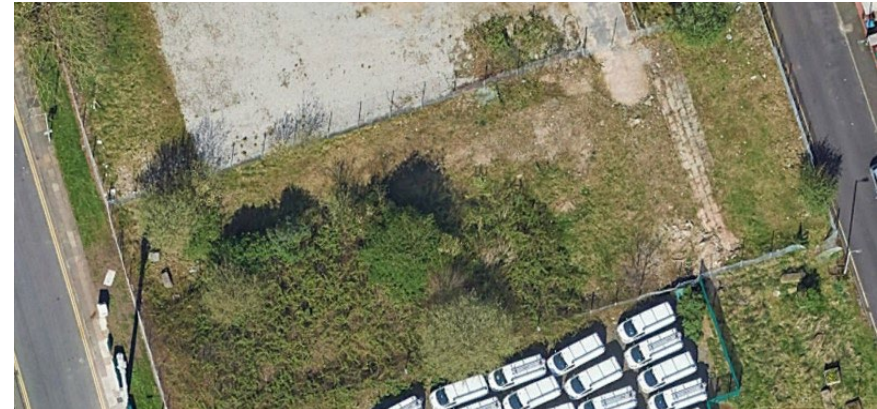
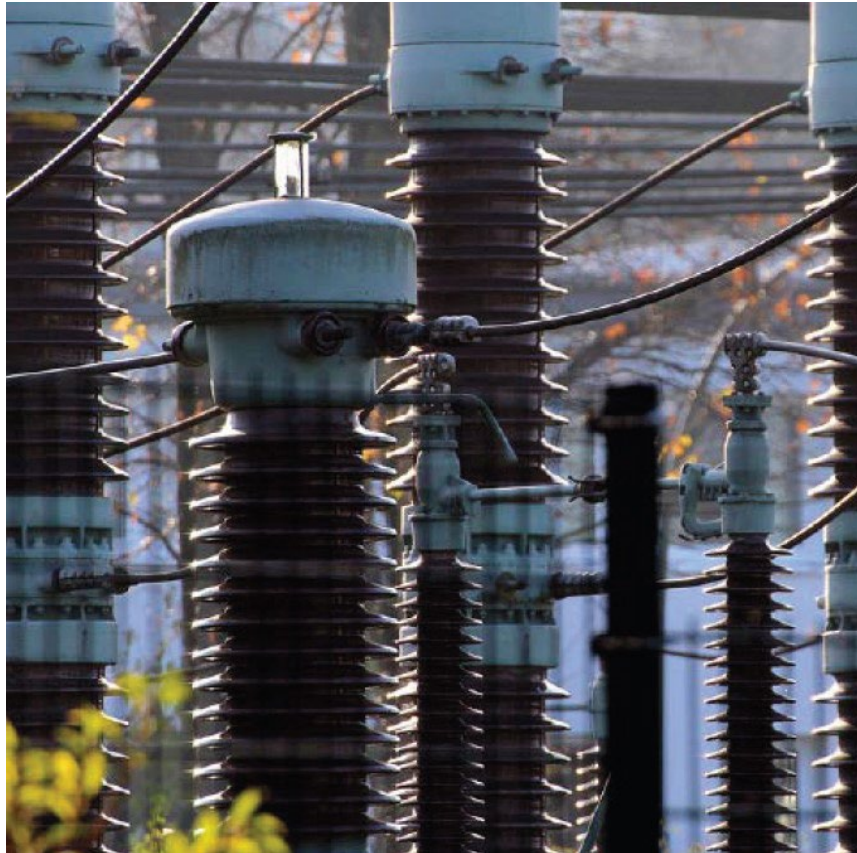




Hulme Primary Substation, Manchester

Planning, Design and Access Statement

JULY 2024
IN10454.001

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Version 1.0

1.0 Introduction

1.0 Introduction

1.1 Introduction

This Planning, Design and Access Statement has been prepared in support of a full planning application for a new substation to be named Hulme Primary Substation ('the Proposed Development') on an area of unused land between Birchall Way and Upper Medlock Street, Manchester, M15 6PL ('the Application Site').

The application is submitted on behalf of Electricity North West Ltd (ENWL) ('the Applicant') with the following description of development being applied for:

"Erection of a substation including switch house, transformers and compounds as well as new security fence and access drive."

The Planning, Design and Access Statement provides a background to the Proposed Development, covering the Application Site and its surroundings, the policy context and the technical assessments which have considered the potential effects of the Proposed Development upon the Application Site and its surroundings.

The Planning, Design and Access Statement has been prepared to assist Manchester City Council ('the Local Planning Authority') in its determination of the application and should be read in conjunction with the suite of supporting material.

A number of technical reports and drawings have been prepared to support this application and should be read in conjunction with the Planning, Design and Access Statement:

Reports

- Ecological Assessment (10454.003)
- Biodiversity Net Gain Metric (x10454)
- Ground Investigation Report (15612)
- Noise Impact Assessment (J004827-7737-SH-01)

Drawings

- Site Location Plan (101045-00002-002)
- Existing Site Plan (101045-00003-002)
- Proposed Site Plan (101045-00004-002)
- Proposed Building Plan (101045-00005-002)
- Proposed Building Elevations Sheet 1 of 2 (100145-00006-002)
- Proposed Building Elevations Sheet 2 of 2 (100145-00007-002)
- Proposed Site Elevations (100145-00008-002)

Document Structure

- Section 2 provides a description of the Application Site and its surroundings
- Section 3 introduces the Proposed Development and provides a case for development
- Section 4 provides analysis of relevant planning policy
- Section 5 outlines the technical matters considered
- Section 6 evaluates the design principles of the Proposed Development
- Section 7 concludes the Planning, Design and Access Statement

2.0 Application Site and Surroundings

2.0 Application Site and Surroundings

2.1 Application Site and Surroundings

The Application Site comprises 1,385m² of land between Birchall Way and Upper Medlock Street, Manchester. The site is a small area of undeveloped land at the edge of a residential area. The site currently comprises a small area of grassland and an area of shrub vegetation. A small area in the east of the site is paved. The site is currently enclosed by a metal fence.

Birchall Way is immediately to the west of the site and Upper Medlock Street immediate to the east; both are relatively minor local roads. To the north and south of the site are further areas of left-over undeveloped land, comprising shrub habitat and areas of hardstanding.

The site is currently accessed via the undeveloped land to the north.

The Application Site lies within Flood Zone 1, where development should seek to be located.

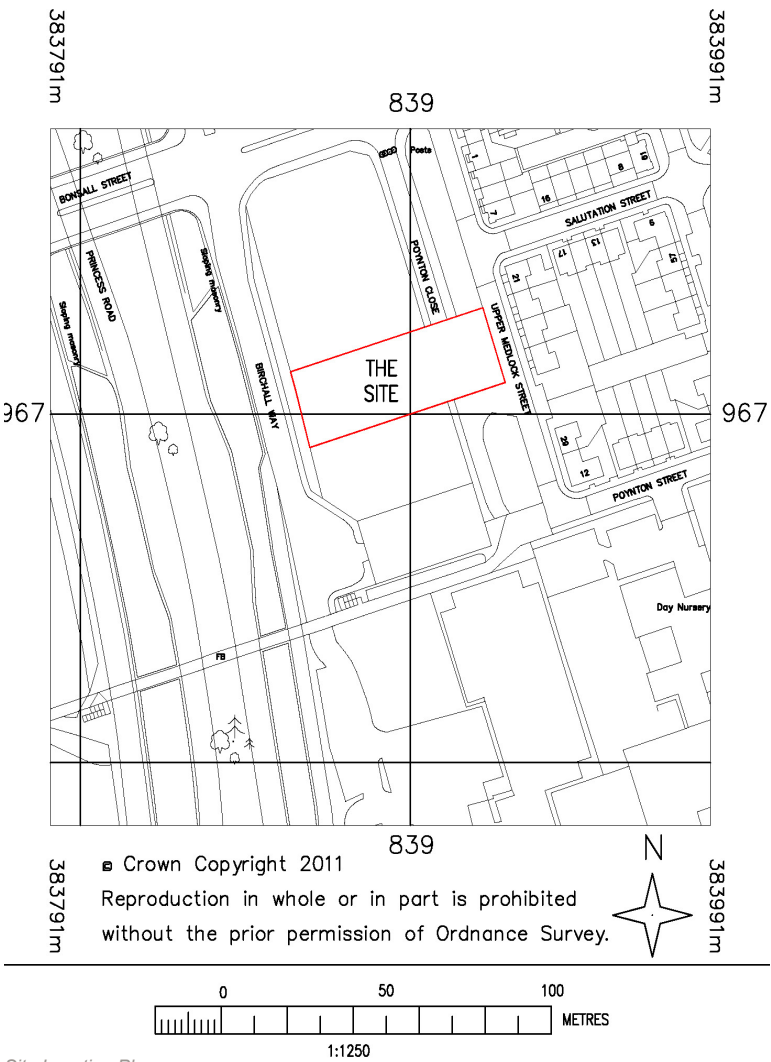
There are no public right of way footpaths within or adjacent to the Site.

The Application Site is not subject to any statutory ecological, heritage or landscape designations.

Planning History

Relevant planning history relating to the Application Site is provided in Table 1 below:

Reference	Description	Decision
103214/FO/2013/S1	Erection of a 5.85m high substation together with associated plant, equipment and fencing	Approved 06/03/2014 (Permission expired)
094855/FO/2010/S1	Use of site for a temporary site compound, consisting of 14 containers and 12 cabins for a period of 18 months	Approved 15/03/2011



3.0 The Proposed Development

3.0 The Proposed Development

3.1 The Proposed Development

The application seeks permission for the erection of a new switch house building and transformers as well as compounds at the land between Birchall Way and Upper Medlock Street.

The new switch house would be built in the western half of the site, on an approximately west-east orientation. The transformers would be attached to the new switch house, immediately to its north. The new substation would have 5.2m high acoustic housing with roof and knock out panel, with a firewall on the northern face of the coolers. A new tarmac access drive would be constructed and a new access created from Upper Medlock Street. The substation site would be enclosed by a new 2.4m high palisade security fence. A number of new cable routes would be laid within the site.

The proposed substation would comprise two adjacent transformer bays, together totalling 24.2 metres in length and 7.1 metres in width. Attached to the southern edge of the compounds would be a switch room, 14.9 metres by 6.1 metres. The substation would have a height of 6.7 metres.

The proposed materials of the substation would be Cheshire Reds brickwork with Staffordshire Blue engineering bricks for soldier courses above doors and brickwork below DPC level. The switch house roof shall be slate grey colour with white PVCu facias, soffits, barge boards and black PVCu gutters. The external security doors shall be brown. There would also be galvanised steel palisade fencing with green powdercoat finish, a new tarmac access drive and concrete paving outside the entrances to the substation building.

There would be no permanent employees based at the new Hulme Primary Substation. The Site would be visited occasionally by authorised operational ENWL engineers to undertake essential inspections and maintenance in a transit van.

Access to the Site would utilise a new access point from Upper Medlock Street, at the eastern edge of the site.

The construction compound would be within the site boundary.

The location of the substation was chosen by Manchester City Council. Electricity North West shall be responsible for the monitoring and servicing of the substation.

3.2 Case for Development

Electricity North West has set out its plan to “lead the North West to Net Zero” by creating a reliable and resilient electricity network. Electricity North West is aware that electrification of various sectors is increasing reliance on the electricity network and it expects demand for electricity to grow in the future (for example due to electric cars and electrified heating systems). ENWL is looking to target investment in its network to reduce power cuts and increase resilience. The new Hulme Primary Substation will help to upgrade and strengthen the network in Manchester.

The Electricity Networks Strategic Framework, published by the Department for Business, Energy and Industrial Strategy in 2022, states that the electricity network needs to be “transformed at an unprecedented scale and pace to accommodate decarbonisation and demand growth”. The framework also sets out that ambitious goals for a reliable, low carbon electricity network can only be met by ensuring the rapid delivery of strategic investments in the electricity network. It is essential to invest in upgrading the electricity network.

The UK Government has set clear targets for the decarbonisation of electricity supply, including an ambition to deliver a decarbonised power system by 2035; this will involve the construction and deployment of multiple renewable generation sites that will need to be served by a robust electricity distribution network. It is increasingly likely that in the coming years there will be increased renewable energy generation from individual households and businesses, as part of the scaling up of renewable energy. The local electricity distribution system will therefore need to accommodate this more complex pattern of electricity supply and demand.

The Greater Manchester Infrastructure Framework 2040 recognises the need for Greater Manchester to work with Electricity North West Ltd to provide a resilient electricity network. The Infrastructure Framework states “*GM needs to work with Electricity North West Ltd and Ofgem to understand the proposed future operation of GM’s electricity distribution network, and how future regulatory regimes, such as the transition of ENWL to a Distribution Service Operator, will assist in promoting the objectives of the GM Infrastructure Strategy.*”

This work to include how the electricity industry and regulatory framework promotes local renewable generation and storage, and the management of additional demands from growth, EV and heat.

GM and districts need to consider the spatial requirements of the electricity distribution

3.0 The Proposed Development

3.2 Case for Development

network, including the provision of substations in the planning of growth areas".

The Infrastructure Framework recognises that a growth in population and employment is likely to drive an increase in electricity consumption.

The Proposed Development will contribute towards a secure, reliable and resilient energy network to support the growth of Manchester and shift to a low carbon economy.

4.0 Planning Policy Context

4.0 Planning Policy Context

4.1 Introduction

Section 38 (6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications are determined in accordance with the Development Plan unless material considerations indicate otherwise.

The National Planning Policy Framework and Planning Practice Guidance are material considerations in the determination of this planning application.

4.2 Adopted Development Plan

The Development Plan for Manchester City Council comprises:

- Manchester Core Strategy (Adopted July 2012);
- Places for Everyone (Adopted March 2024)

The Manchester Core Strategy is the key document in Manchester's Development Plan and covers the period from 2012 to 2027. It outlines the vision for Manchester in 2027 along with the policies that will be used to deliver that vision. Places for Everyone is a regional plan for nine of the districts of Greater Manchester which sets out a long-term plan for jobs, new homes and sustainable growth.

Table 2 identifies the key policies from the Adopted Development Plan that the development will be assessed against:

Table 2 Relevant Planning Policies

Policy	Description
Manchester Core Strategy	
EC 3	The Regional Centre
EC 8	Central Manchester
H 5	Central Manchester
EN 1	Design Principles and Strategic Character Areas
EN 4	Reducing CO ₂ Emissions by Enabling Low and Zero Carbon Development
EN 5	Strategic Areas for low and zero carbon decentralised energy infrastructure

Policy	Description
EN 7	Energy Infrastructure Opportunities
EN 15	Biodiversity and Geological Conservation
DM 1	Development Management
Places for Everyone	
JP-Strat5	Inner Areas
JP-S1	Sustainable Development
JP-S2	Carbon and Energy
JP-S3	Heat and Energy Networks
JP-G7	Trees and Woodland
JP-G8	A Net Enhancement of Biodiversity and Geodiversity

4.0 Planning Policy Context

4.3 National Planning Policy

National Planning Policy Framework

The National Planning Policy Framework ('the Framework') sets out the Government's definition of sustainable development and identifies how planning policies for England are expected to be applied. The Framework is a significant material consideration.

The Framework is purposefully positive, opportunity focused and pro-growth in seeking to facilitate development which will contribute to meeting the wider Government objectives.

Paragraph 7 of the Framework explains that *'the purpose of the planning system is to contribute to the achievement of sustainable development' which can be summarised as 'meeting the needs of the present without compromising the ability of future generations to meet their own needs.'*

Paragraph 8 of the Framework states that *'achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):'*

- a) 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;*
- b) 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 a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and*
- c) environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy '.*

Chapter 6 states that potential barriers to economic investment should be addressed such as

inadequate infrastructure.

Chapter 12 says that development should function well and add to the overall quality of the area and sympathetic to local character.

Chapter 15 of the Framework sets out the Government's policies for conserving and enhancing the natural environment. The aim is to ensure that natural habitats are protected and enhanced, to contribute to wider patterns of sustainable development.

Planning Practice Guidance

Planning Practice Guidance (PPG) was launched on 6th March 2014. It replaces previous government guidance, bringing it together in one central location. The PPG supports the NPPF and provides guidance of all aspects of the Planning System, including the use of conditions and planning obligations as well as on specific areas including: transport, open space, flood risk, renewable energy and design.

PPG includes a section on the requirement for good design, stating that good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people.

4.0 Planning Policy Context

4.4 Compliance with Planning Policy

Policy EC 3 (The Regional Centre) states that within the regional centre, development for employment generating uses including offices and other commercial development will be encouraged if in appropriate accessible locations and of an acceptable type and scale. The proposed development is not for an employment generating use, however as essential electricity infrastructure which will enhance a resilient and reliable network, the development will support the development of other uses.

Policy EC 8 (Central Manchester) states that Central Manchester is expected to provide around 14 hectares of employment land over the plan period, primarily within the Corridor within the Central Manchester Regeneration Area, existing employment and economic development areas and the district centres of Hulme, Rusholme and Longsight. Furthermore, under **Policy H 5** (Central Manchester), the area should accommodate approximately 14% of new residential development, priority will be given to family housing and high value, high quality development.

Again, the proposed development is not directly relevant to these policies, however it will support the development of employment and housing land by enhancing a resilient and robust electricity network, meaning that these development policies can be delivered with the knowledge that there is the infrastructure in place to support them.

Policy EN 1 (Design Principles and Strategic Character Areas) requires development to follow the seven principles of urban design and to have regard for the strategic character area in which it is located. The character of Manchester's Central Arc Character Area (where the proposed development is located) is defined by 1960s social housing and zoned industrial areas bisected by the transport network. It is an area of major regeneration and redevelopment.

The proposed development is for electricity infrastructure and therefore must be designed to be functional. However, the site is close to major transport infrastructure (A5103 Princess Road) and industrial areas are noted to be part of the area's character. The development will therefore not be incongruous and has regard for the character of the area.

Under **Policy EN 4** (Reducing CO₂ Emissions by Enabling Low and Zero Carbon Development) the council will aim to decouple economic growth from growth in CO₂ emissions. For example, it will encourage new developments to meet some of their energy requirements

using low or zero carbon energy generating technologies. **Policy EN 5** (Strategic Areas for low and zero carbon decentralised energy infrastructure) identifies the regional centre (where the proposed development is located) as one of several key areas which will have a major role to play in achieving an increase in the level of decentralised low and zero carbon energy supplies available. Proposals should be put forward for the supply of decentralised low and zero carbon energy.

Furthermore, **Policy EN 7** (Energy Infrastructure opportunities) states that there will be a presumption in favour of low and zero carbon decentralised energy schemes. The cumulative impact of energy schemes will be taken into account when considering applications, including impacts on air quality and landscape character.

Though not low or zero carbon, the proposals contribute to the delivery and enhancement of a secure and robust electricity supply, necessary for the transition to a low carbon economy. There will be no cumulative impacts with other energy schemes and, given the small nature of the proposals, no adverse impacts on air quality. The Application Site is generally surrounded by built form and there will be no impact on landscape character. Due to the roll out of small-scale renewable energy, individual businesses and households are likely to generate more of their own electricity. This will require changes to and significant investment in the electricity distribution network to increase resilience. The development of Hulme Primary Substation will improve the reliability of the electricity network in the area.

Policy EN 15 (Biodiversity and Geological Conservation) states that the Council will seek to maintain or enhance sites of biodiversity and geological value, particularly sites with international or national designations, as well as other sites of biodiversity value and protected and priority species. The Council also aims to protect and conserve existing trees and woodland and aim for a net increase in trees across the city. Developers should identify and implement reasonable opportunities to enhance, restore or create new biodiversity (either on site or adjacent to the site). Any adverse impacts on biodiversity must be justified against the wider benefits of the proposal and appropriately mitigated or compensated for.

The proposed site is not designated for biodiversity and is of limited size and value. An Ecological Assessment has been carried out for the development, which found that the proposed development is not anticipated to result in significant ecological impacts. Ecology should not pose an obstacle to planning being granted, providing adequate safeguarding and

4.0 Planning Policy Context

mitigation measures are put in place. No direct or indirect impacts on any statutory or non-statutory designated sites are anticipated as a result of the proposals.

Policy DM 1 (Development Management) sets out general guidelines which developments should have regard to. Development should consider appropriate siting, layout, scale, form, massing, materials and detail and should consider its impact on the surrounding area, having regard to surrounding character. Effects on amenity including noise should also be considered. Sites should have appropriate access and parking. Development should manage its effect on biodiversity, landscape, archaeology and built heritage and consider flood risk and drainage.

The proposed substation would be relatively small in scale, just over 6 metres in height and occupying a relatively small site, which is currently unused. It will be constructed primarily from red brick, which will complement the industrial heritage of the area. A new access point will be created from Upper Medlock Street and there will be space on site for the parking of maintenance vehicles. There will not be any employees permanently working at the site, there will be regular maintenance visits. As a small development on a small, undeveloped, undesignated site, the proposals would have a limited impact on biodiversity, landscape, archaeology or built heritage. The site is in Flood Zone 1 and therefore is at low risk of flooding from rivers and the sea.

A noise impact assessment was carried out by PDA in March 2024 for the proposed new substation. The nearest noise sensitive receivers relative to the site are residential dwellings to the west of the proposed site. The survey concluded that it is unlikely that noise emissions from the proposed development would cause an adverse impact for residents in the vicinity of the proposed development.

Places for Everyone

Policy JP-Strat5 (Inner Areas) states that the continued regeneration of the inner areas will be promoted, high levels of new development should be accommodated in this area. Infrastructure provision will facilitate the growth of the inner area. The proposed substation site is within the Inner Area. As a piece of key infrastructure which will enhance the reliability and resilience of the electricity network in the area, it will support other development in the area and therefore the continued regeneration.

Under **Policy JP-S1** (Sustainable Development) development should aim to maximise its economic, social and environmental benefits and minimise its adverse impacts to help tackle climate change. In bringing forward previously developed sites for development, particular attention will be brought to tackling land contamination. Additionally, **Policy JP-S2** (Carbon and

Energy) sets the aim of delivering a carbon neutral Greater Manchester no later than 2038 and says that a positive approach should be taken to renewable and low carbon energy schemes.

Policy JP-S3 (Heat and Energy Networks) sets out that the provision of decentralised energy infrastructure is critical to low carbon growth and an increase in local energy generation.

As stated previously, the development of new electricity infrastructure (while not in itself renewable or low carbon development) will help to ensure the necessary infrastructure is in place to support these low carbon schemes. Being a small development on a small, unused site within the urban area, the proposed development will have limited adverse impacts. Furthermore, the proposed development will contribute directly to the achievement of **Policy JP-S3** by adding additional capacity to the local energy network to cope with increased local energy generation.

Strata Surveys Limited completed a Ground Investigation Report in April 2013 with fieldwork carried out in February 2013. The waste carrier of the spoil pile should confirm the suitability of the landfill site selected for disposal. There is minimal risk of harmful ground gases that would prevent construction of the substation.

Policy JP-G7 (Trees and Woodland) states that where development would result in the loss of existing trees, they must be replaced on the basis of two new trees for each tree lost, with a preference for on-site provision. Other measures that would result in a net enhancement in the character and quality of the treescape and biodiversity value in the local area may be appropriate.

Existing trees on site will be lost and cannot be replaced on the small site due to the need for this key electricity infrastructure to operate safely and effectively. It is therefore proposed that any trees would be replaced off site.

Policy JP-G8 (A Net Enhancement of Biodiversity and Geodiversity) states that development will be expected to follow the mitigation hierarchy (i. avoiding harm, ii. mitigating harm, iii. compensating for harm) and that development should achieve a measurable net gain in biodiversity of no less than 10%.

Given the safety and operational requirements of electricity infrastructure, there will be a loss of biodiversity on site. The existing vegetation will be removed, a new building will be constructed along with a new tarmac access drive and limestone chippings to cover the remaining areas. The loss of vegetation is necessary to ensure safe and effective operation. Calculations using the Defra Small Sites Metric show that the site contains 1.1905 habitat units, which would be lost. It is therefore proposed that compensation takes place off site.

5.0 Technical Assessment

5.0 Technical Assessment

5.1 Ecology

An Ecological Assessment including a Phase 1 habitat survey was completed by TEP in April 2024. All designated wildlife sites are well separated from the site and disturbance to such designated sites during both the construction and operation phase are considered unlikely to occur. Also, the proposals do not meet the risk parameters for the SSSI Impact Risk Zone that the site is within.

There are no notable habitats on or adjacent to the site. All habitats on site are considered to be of low ecological value such that their loss is considered to be of low significance.

All trees on site were assessed as having negligible suitability for roosting bats.

The scrub on site offers some limited opportunity for foraging bats but as there is no connectivity to other green spaces and given the urban location, it is of low value.

The trees and scrub within the site provide potential for nesting birds. Subsequently vegetation clearance should avoid the nesting bird season (typically taken to be February to September inclusive).

5.2 Noise

A noise impact assessment was carried out by PDA in March 2024. The nearest noise sensitive receptors to the site are residential dwellings to the west.

A survey was conducted of the background sound levels at the nearest noise sensitive receptors. Typical daytime background sound levels were found to be ≥ 51 dB LA90,15mins. Typical night-time background sound levels were found to be ≥ 44 dB LA90,15mins.

Under a worst case operational scenario, the transformers were predicted to produce a source noise level of 41dB(A) at the façade of the worst affected residence. This level is 3dB below the night-time background level.

BS 4142:2014 states that “where the rating level does not exceed the background sound level, this is an indication of the specific sound source having a low impact, depending on the context.”. As such, it is unlikely that noise emissions from the proposed development would cause an adverse impact for residents in the vicinity of the proposed development.

The National Planning Policy Framework requires that significant adverse impacts due to a new development should be avoided and other adverse impacts should be mitigated and reduced to a minimum. Based upon the above assessment it is concluded that the sound levels arising from the operations of

the proposed transformers are below the level where adverse impacts may occur.

5.3 Contamination

Strata Surveys Limited completed a Ground Investigation Report in April 2013 with fieldwork carried out in February 2013. Waste Acceptance Criteria results showed that samples selected for test are not inert due to exceedances of Organic Content. The other criteria for Waste Acceptance Criteria are below the Inert Limits. The Waste of the spoil pile will be classed as not inert. The waste carrier should confirm the suitability of the landfill site selected for disposal and confirm the landfill class of the spoil. There is minimal risk of harmful ground gases that would prevent construction of the substation.

6.0 Design Principles

6.0 Design Principles

6.1 Use

The application seeks permission for the construction of a Primary Substation including switch house and transformers on an area of unused land between Birchall Way and Upper Medlock Street, Manchester. The proposed development forms part of works by Electricity North West to upgrade and strengthen the resilience of the network to respond to future capacity requirements.

There will be no permanent employees based at the Site. The Site will be visited occasionally by authorised operational ENWL engineers to undertake essential inspections and maintenance.

6.2 Amount

The Application Site comprises an area of 1,385m² of land. The proposed substation consists of an attached switch house building (14.885m by 6.125m) and transformer compounds (23.1m by 7.050m). The substation building will have a height of 5.2m. The site will be enclosed by a new 2.4m high palisade security fence.

6.3 Layout

The proposed substation layout has been designed to ensure safe and efficient operation. The switch house will be in the west of the site on an approximate east-west axis with the transformer compounds attached to the northern edge of the switch house.

The switch house will be accessed from doors on its eastern and western sides. There will be a small WC in the south-west corner of the switch house, which will have its own external access door. The transformer compounds will be accessed from doors along their northern edge.

Perimeter fencing is proposed to enclose the site; this will be a 2.4m high galvanised steel palisade security fence. There will be a new gate in the north-eastern corner of the site (along Upper Medlock Street). A new access track will run west from the access point up to the new substation building in the west of the site.

6.4 Scale

The maximum dimensions of the proposed substation (combined switch house and transformer compounds) are as follows:

- Length – 24.187 metres
- Breadth – 13.234 metres
- Height – 6.715 metres

A 2.4m high palisade fence and gate will be installed around the perimeter of the site.

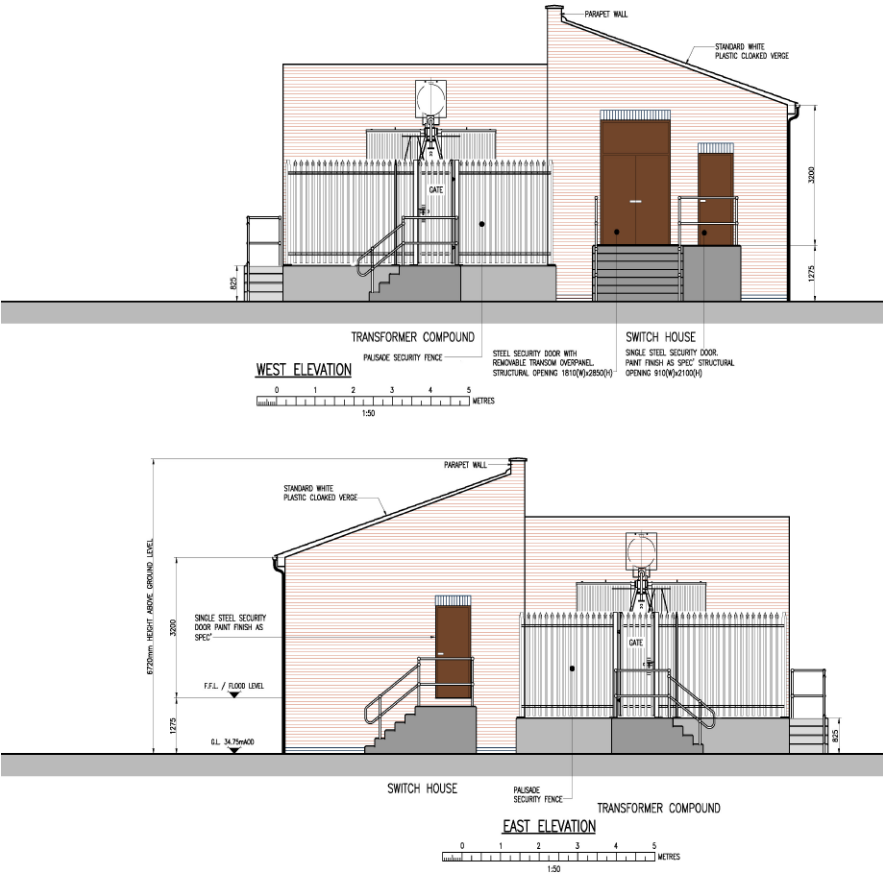
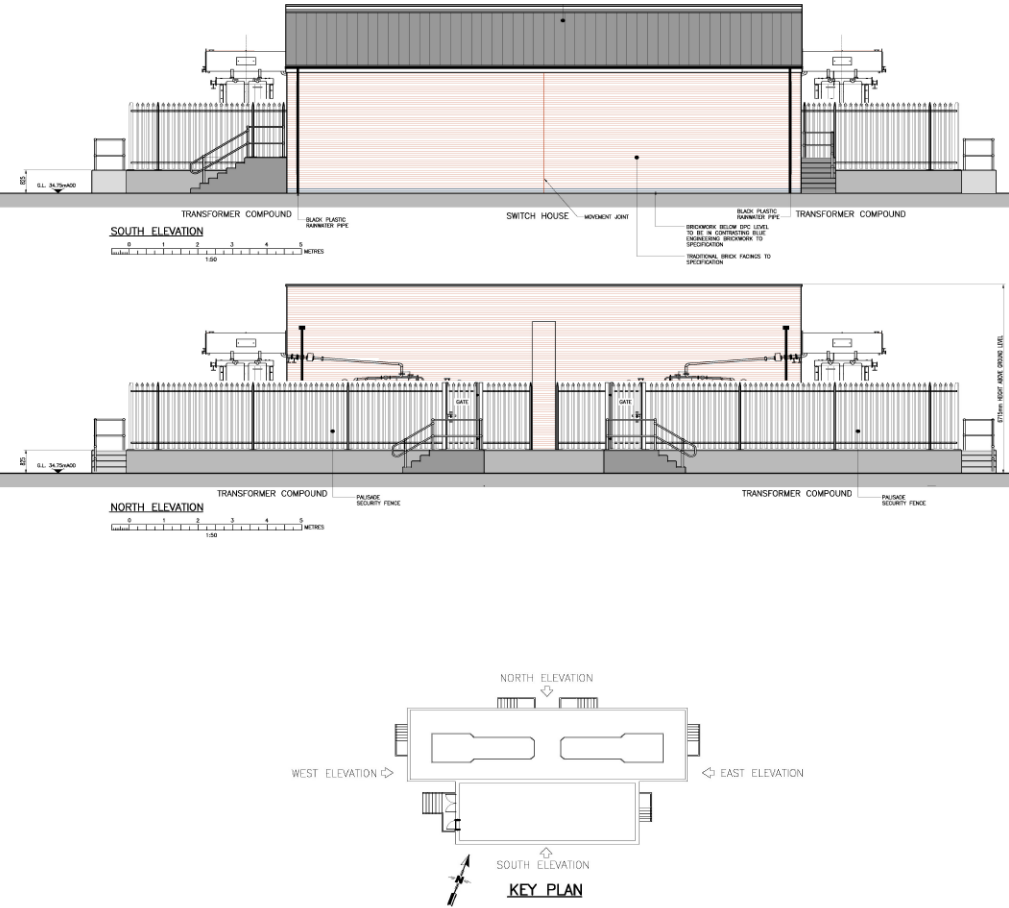
6.5 Access

Access will be taken from a new vehicular access in the north-eastern corner of the site off Upper Medlock Street. Maintenance/inspection visits shall be infrequent and done by transit van. There shall be no road or path closures for construction.

Proposed Site Plan

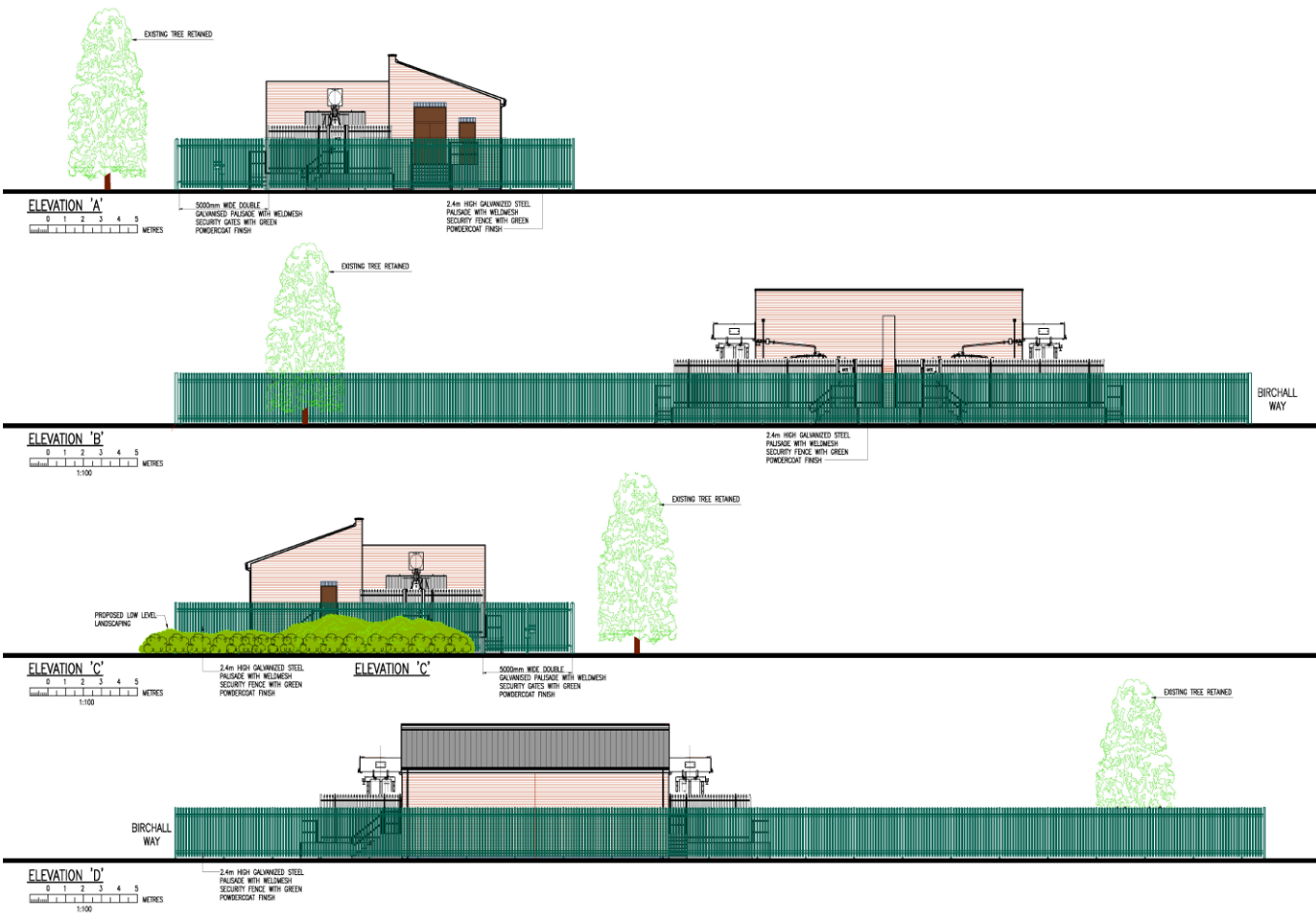


6.0 Design Principles



Proposed Site Elevations

6.0 Design Principles



Proposed Site Elevations

6.0 Design Principles



Looking north across the site



Western site boundary



Looking west across the site

6.0 Design Principles

6.6 Appearance

The proposed materials of the substation would be Cheshire Red brickwork from Ibstock, with Staffordshire Blue engineering bricks for soldier courses above doors and brickwork below DPC level. The switch house roof would be slate grey colour with white PVCu fascias, soffits, barge boards and black PVCu gutters. The external security doors would be brown. There would also be galvanised steel palisade fencing with green powdercoat finish, a new tarmac access drive and concrete paving outside the entrances to the substation building. There would be PIR lighting.



Brickwork (Ibstock 'Cheshire Red')



Staffordshire Blue brickwork for above openings



Eurocell Envirotile in 'Slate Grey'



Galvanised Steel Palisade Fencing, Powdercoat Green

7.0 Summary

7.0 Summary

7.1 Summary

This Planning, Design and Access Statement has been prepared in support of a full planning application for a new substation (to be known as Hulme Primary Substation) on land between Birchall Way and Upper Medlock Street, Manchester.

The Proposed Development will contribute towards a secure, reliable and resilient energy network to support the growth of Manchester and shift to a low carbon economy.

Section 38 (6) of the Planning and Compulsory Purchase Act 2004 states that decisions on planning applications must be made in accordance with the Development Plan for Manchester City Council and this has been demonstrated through the policy analysis which supports the proposals.

The technical assessments and reports which support the application identify any potential impacts of the Proposed Development on the Application Site and the surrounding area. These reports identify that the Proposed Development would not give rise to any significant adverse impacts.

In the absence of any adverse impacts that outweigh the benefits of the scheme, and that the proposed development is not in conflict with the development plan, we would urge that the development be approved without delay.

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