



**DALCOUR
MACLAREN**

Planning Supporting Statement

Client: Cadent Gas Limited

Project: Barlowmoor Clen Gas Governor

Date: December 2022



Project Details

Project Name	EP – Barlowmoor Clen Gas Governor
Scheme Number	22003255
Report Number	01

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Appendices

Appendix 1	Preliminary Ecological Appraisal
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Drawings

Drawing No.	Drawing Reference	Scale
22004461_PLN_LOC_3.1	Site Location Plan	1:1250@A3
22004461_PLN_SI_4.1	Existing Site Layout	1:200@A3
22004461_PLN_SI_5.1	Proposed Site Layout	1:200@A3
70096291-WSP-ZZ-00-DG-AR-0103	Proposed Elevations	1:50@A1

1 Introduction

1.1 Background to the Application

- 1.1.1 Dalcour Maclaren (DM) has been instructed by Cadent Gas Limited (hereafter referred to as 'Cadent') to seek full planning permission for the demolition of the kiosk and existing gas infrastructure on-site at their Barlowmoor Clen site, Manchester, and the installation of an uprated kiosk mounted on a concrete plinth, to house a replacement governor. As part of this planning application, Cadent are also applying for new weldmesh fencing, 2.4m in height, to be erected around the boundary of the site.
- 1.1.2 The existing governor at Barlow Moor is non-compliant, outdated and can no longer support current or anticipated future gas demands. Cadent are therefore required to install a new replacement gas governor which can meet future demands and anticipated 1:20 winter scenarios where the demand for gas is at its peak.
- 1.1.3 In accordance with the relevant industry standards and guidance from the Institution of Gas Engineers and Managers (IGEM), new governors are required to have a minimum of 3m clearance around essential infrastructure. In line with this, Cadent are proposing to dismantle the existing governor and kiosk on-site and install a replacement uprated gas governor within a new larger kiosk which will encompass the footprint of the original.

1.2 Site Location and Description

- 1.2.1 The proposed development is located at grid reference SJ 82338 92769, north-east of Barlow Moor Road, Chorlton, Manchester, M21 7GZ, hereafter referred to as 'the Site'. The Site can be seen in drawing number 2004461_PLN_LOC_3.1 and in Figure 1 below.



Figure 1: Aerial imagery of the Barlowmoor Glen site, demarcated in red (Google Earth Imagery, 2022)

- 1.2.2 As shown on the existing site layout plan (22004461_PLN_SI_4.1) and within Figure 1 above, the Site is an irregular shape parcel of land which sits within the Southway Housing Trust freehold and is operated by Cadent.
- 1.2.3 The Site is bounded by:
- Residential gardens to its north, east and west sides; and
 - Electricity Substation site to the south, followed by a private access track, leading north-west off Barlow Moor Road, which serves the property beyond;
- 1.2.4 The wider landscape is characterised by extensive residential development and the Manchester Crematorium to the south-east.



Figure 2: The existing gas governor site (Google Earth Streetview, 2021)

- 1.2.5 The Site comprises an enclosed compound demarcated by palisade fencing within which Cadent have an existing gas governor housed within a Glass Reinforced Plastic (GRP) kiosk. See Figure 2 above.
- 1.2.6 Access to the Cadent compound is taken from the unnamed private track leading north-east from Barlow Moor Road (Figure 3), for which Cadent have a right of access. Due to the restriction on vehicle movement along the unnamed track and the confined space within the compound, the Site can only be accessed on-foot from the track.



Figure 3: Existing and proposed access route to the Site, leading north-east off Barlow Moor Road (Google Earth Streetview, 2021)

1.3 Gas Act 1986

1.3.1 As a statutory undertaker, Cadent are duty bound to undertake regular maintenance of their gas infrastructure where required, to ensure that it is operated in a manner whereby the health and safety of the public is not put at risk:

1.3.2 Section 9.1 of the Gas Act 1986 in particular states that:

“It shall be the duty of a gas transporter as respects each authorised area of his -

a) To develop and maintain an efficient and economic pipeline system for the conveyance of gas.”

1.3.3 As the new uprated kiosk and fencing are required to protect the replacement gas governor at Barlowmoor Glen and allow Cadent to continue to provide a safe and secure supply of gas to their customers, the proposed development is therefore, considered necessary under Section 9 of the Gas Act 1986, as well as The Pipeline Safety Regulations 1996.

1.4 Town and Country Planning Act

1.4.1 For clarity, this application only applies to the demolition of the existing GRP kiosk at Barlowmoor Glen, the installation of a replacement kiosk mounted on a concrete plinth and the erection of weldmesh fencing, 2.4m in height, around the perimeter of the Site.

1.4.2 This application does not cover the replacement gas governor which is considered to be plant and machinery and will be installed under Cadent's permitted development rights under Part 15 Class A(a) of the GPDO as “the laying underground of mains, pipes or other apparatus.”

1.4.3 As the proposed kiosk will be 226.8m³ in capacity and therefore will exceed the permitted development threshold of 29m³ under Part 15 Class A(b) of the Town and Country Planning Act (General Permitted Development) (England) Order 2015 (hereafter referred to as the ‘GPDO’), it is not possible to install this element under the same Part.

2 Proposed Development

2.1 Need for the Proposed Development

- 2.1.1 The existing gas governor is non-compliant, outdated and can no longer support current or anticipated future demands for gas supply. As part of Cadent's programme for the replacement of its <2bar gauge gas governors regionally, Cadent is proposing to remove the existing governor and install a replacement at Barlowmoor Cln. The new gas governor has been designed to meet future demands, including anticipated peak 1 in 20-year winter scenarios.
- 2.1.2 In accordance with IGEM/TD/13 Edition 2, international industry standards and guidance covering the design, construction, operation, inspection and maintenance of pressure regulations installations, new governors are required to have a minimum of a 3m clearance around essential infrastructure. As well as maintaining a safe separation distance from other structures and occupied buildings, this clearance also allows for unobstructed access to inlet and outlet pipework and sufficient space for ventilation.
- 2.1.3 This guidance has been developed by the Institution of Gas Engineers and Managers (IGEM) and adopted by Cadent for use within their networks. This guidance is a main consideration when assessing the safety of both existing and proposed gas infrastructure.
- 2.1.4 For the reasons outlined above, Cadent are proposing to dismantle the existing governor and kiosk on-site and install a replacement uprated gas governor within a new larger kiosk which will encompass the footprint of the original. As part of this planning application, this will also include new weldmesh fencing, 2.4m in height, to be erected around the boundary of the site.

2.2 Description of the Proposed Development

- 2.2.1 The proposed development as shown in Proposed Site Layout Plan (ref: 22004461_PLN_SI_5.1) comprises the demolition of the existing and the installation of a replacement kiosk required to house a new gas governor on land at Barlow Moor Road, Manchester. The dimensions of the proposed kiosk will be 11.8m x 6.2m x 3.28m (l x w x h, tallest height given from finished floor level). The proposed kiosk will be mounted on a concrete plinth at a height of 0.15m above ground level.
- 2.2.2 As the proposed kiosk will be 240m³ in capacity and therefore will exceed the permitted development threshold of 29m³ under Part 15 Class A(b) of the GPDO, Cadent are therefore seeking planning permission for its installation.

- 2.2.3 As shown in drawing ref 70096291-WSP-ZZ-00-DG-AR-0103, the kiosk will have a shallow pitched roof with a depth of 0.18m.
- 2.2.4 The new kiosk will be constructed of GRP and finished in BS 4800 Holly Green (C-14-39). The external finish can be smooth or textured, depending on the preference of Manchester City Council. As the kiosk is surrounded on three sides by residential gardens, it is considered that the colour and materials being proposed for the replacement kiosk will be in context with existing on-site infrastructure and surrounding vegetation and will therefore, minimise the visual impact of the development.
- 2.2.5 As part of the proposed development, the existing palisade fencing will be dismantled and new green weldmesh security fencing, 2.4m in height, will be erected around the kiosk. In line with the relevant industry standards and guidelines, IGM/TD/3/Edition 2, the replacement fencing will allow for the required 3m separation distance from the kiosk and will discourage vandalism, 3rd party interaction and unsightly graffiti to the Site.

2.3 Construction Methodology

- 2.3.1 Whilst the exact methodology for construction is not yet known, it is likely to consist of the following:
- 1) Tree removal to be undertaken in February 2023 to avoid nesting bird season.
 - 2) Construction works to take place at the beginning of April 2023. This will include enabling works for the installation of the replacement governor and the laying of the concrete plinth.
 - 3) The replacement kiosk will be transported to site pre-fabricated, to minimise construction time and disruption, and then lowered into position.
 - 4) Finally, the new weld-mesh security fencing will be erected around the perimeter of the Site, encompassing the required 3m clearance from the kiosk.
- 2.3.2 Construction will take place Monday to Friday between the hours of 07:30 to 17:00, with no work on weekends, bank holidays or outside of these working hours. Works are likely to take up to nine weeks to complete, however, the spatial extent of the proposed development is considered to be minimal in the context of the existing site.
- 2.3.3 The working area will be the lease area shown in the attached plan ref: 21000103_PLN_LE_4.1. All materials will be stored on-site within this fenced-off compound.

- 2.3.4 During the construction phase there is likely to be a relative increase in construction traffic accessing the works area to facilitate the proposed development. There will be no increased traffic on the road as a result of the works during the operational phase, however, and only low frequency maintenance is expected, similar to the existing, unless in an emergency.
- 2.3.5 Vehicles will be parked within the lease area off the highway when not in use and no highways diversions or alternative arrangements will be required to facilitate the installation of the proposed kiosk.
- 2.3.6 Vehicles on-site are likely to include:
- Vans
 - 3-tonne diggers
 - 3-tonne dumpers
 - Grab Wagons
 - Crane
- 2.3.7 All site waste materials will be segregated on-site and sent to appropriate disposal and recycling sites depending on the waste category. The Site contractor will ensure that a site waste management plan is prepared prior to construction which will detail disposal methods, types and volumes of waste and will ensure the policies set out within the area are followed.

3 Environmental Considerations

3.1 Landscape and Visual

- 3.1.1 The Site lies within the Manchester Conurbation National Character Area (Natural England, 2013), characterised by dense urban and industrial development. Although a minimal amount of additional land-take will be required in order to facilitate the installation of the new kiosk, the proposed development can be seen to be in accordance with the context of Cadent's existing site and the local landscape.
- 3.1.2 The proposed development is the minimum size required to provide the necessary infrastructure to meet future anticipated demands on the gas network and Health and Safety requirements. Furthermore, the replacement kiosk will be similar in terms of design and appearance to the existing.
- 3.1.3 It is also considered that the proposed green weldmesh fencing will provide greater screening of the new kiosk than the existing palisade fencing and mitigate any additional visual impact that may result from its installation.

3.2 Arboriculture

- 3.2.1 The Site is not situated within a Conservation Area and no trees on or near the Site are protected under a Tree Preservation Order (TPO).
- 3.2.2 In order to facilitate the works, a number of trees located within the red line working area will need to be removed due to the compact site and density of tree growth (refer to table 2 below for these trees).

Table 2			
Trees to be removed			
Tree ref number	Species	Category	Reason
T1-T3, T5, T6, T8	Cherry	C1	Access
T7	Sycamore	C1	Access
T9	Cherry	C1	Access and building
T10	Sycamore	B1	Building
T11	Sycamore	C1	Building
T13	Norway maple	B1	Building
T14	Sycamore	B1	Building
T16	Sycamore	C1	Building

Table 2			
Trees to be removed			
Tree ref number	Species	Category	Reason
T17	Oak	B1	Building
T19	Sycamore	B1	Building
T20	Sycamore	C1	Building

3.2.3 An Arboricultural Impact Assessment undertaken of the Site in July 2022 (Appendix 2) concluded that the tree(s) in question to be removed (referred to in the report as T1-T3, T5, T6, T8, T7, T9, T10, T11, T13, T14, T16, T17, T19 and T20) are of low to moderate quality (please see Table 2). No trees of high quality (Category A) to be removed.

3.2.4 It is concluded within the Arboricultural Impact Assessment that all remaining trees which are at risk during the construction period, which are in close vicinity to the works, can be successfully retained and suitably protected with appropriate protective measures. These trees are referred to in the Assessment as T4,T12,T15,T18 and T21.

3.2.5 As recommended within the report, the following mitigation will be employed:

- Before any materials or machinery are brought onto site, and before any excavation and construction work can commence, protective fencing will be erected around the trees adjacent to the development area, which are to be retained. This fencing will remain intact for the duration of the works.
- No storage of materials, equipment or vehicles within the Root Protection Areas (RPAs) of any trees. It should be generally accepted that these will need to be located well away from the RPAs of retained trees, unless existing ground protection is used, or temporary suitable ground protection is provided.
- It will be ensured that the existing surface or the finished surface is not heavily compacted. In no circumstances shall soils be increased or lowered around the stems of trees to avoid long-term adverse impacts to the trees' health.
- All works will be carried out by a competent tree surgeon to British standard recommendations BS 3998:2010 Tree work – Recommendations, or as modified by more recent research.

- Where surface roots are found, or roots are found within the profile to be cut, contractors will consult with the project Arboriculturist.

3.2.6 It is recognised that in order to facilitate the installation of the new kiosk, the loss of several low to moderate quality trees is required. Due to the need to maintain a minimum clearance of 3m around the new governor, there is a clear inability to replant within the new compound. Nonetheless, Cadent would be open to discussing some form of compensation for the loss of these trees.

3.3 Ecology and Biodiversity

3.3.1 In addition to the existing governor compound, the area also comprises an area of unmanaged deciduous woodland habitat to the rear of the existing electricity substation site and between residential properties. The entirety of the Site supports young to semi-mature unmanaged broadleaf woodland, with some individual more mature trees.

3.3.2 There are no statutory or non-statutory ecological designations within or adjacent to the Site. The nearest environmental designation is the Chorton Water Local Nature Reserve (LNR) located 775m south-west of the Site. Due to this distance coupled with the level of built development in between the Site and the LNR, it is not anticipated that the proposed works will have any direct or indirect impacts to any designated sites.

3.3.3 A Preliminary Ecological Appraisal (PEA) of the Site (Enzygo Environmental Consultants, July 2022, see Appendix 1) determined that there were no trees likely to be impacted by the works found to have medium or high bat roosting potential. Two trees were identified as potentially providing low suitability for roosting bats which Cadent would be committed to soft felling under the supervision of a Suitably Qualified Ecologist (SQE) present.

3.3.4 The woodland present on-site provides a limited extent of suitable shelter, refuge and foraging habitat for other wildlife such as Common Toad, Hedgehog and Slow-worm. Precautionary measures will be followed during the construction phase to minimise the risk of killing/injury of other Priority Species, including the following:

- SQE to check any potential habitats/refugia immediately prior to clearance.
- Vegetation to be cut/felled to a height of 0.15m to encourage any wildlife present to disperse from the working area.
- Any remaining wildlife shall be carefully moved to the safety of suitable off-site refugia by the SQE, using gloves and a clean bucket, as necessary.

- The cut habitats and any remaining refuge habitats will once again be checked by the SQE prior to the stripping of the top-soil.
- To minimise the risk of killing/injuring of wildlife such as Slow-worm and Hedgehog, avoiding leaving open excavations accessible. Escape ramps will be provided to ensure that no wildlife become trapped overnight. Each morning, excavations will be inspected for the presence of wildlife.

3.3.5 Vegetation clearance is currently proposed for February 2023, in order to avoid bird nesting season (March to August inclusive) and any impacts on birds which may be nesting in the vegetation or trees. If for some reason, programme is delayed and the clearance is unable to take place in February, then a SQE will undertake checks prior to the clearance to ensure no active nests are present. If any active nests are encountered, a suitable buffer will be left and clearance will only be undertaken until it has been confirmed that the nest is no longer in use.

3.3.6 It is recognised that some level of vegetation clearance will be required to facilitate the works. Cadent would be open to discussing some form of habitat replacement, e.g. installation of bat or bird boxes with Manchester City Council.

3.4 Heritage and Archaeology

3.4.1 The Site is not located within or in proximity to any Conservation Areas or designated or non-designated heritage assets. The nearest listed building, Grade II listed 'Manchester Crematorium Southern Cemetery Chapel', is located 100m south-east of the Site and there is a Grade II Registered Park and Garden, 'Manchester Southern Cemetery' located 110m north-east. Due to the scale and nature of the proposed development, to be located within the context of an existing site, and the screening provided by fencing, cemetery buildings and vegetation in-between, it is not anticipated that there will be any impact or harm to any heritage assets resulting from the proposed development.

3.4.2 Therefore, due to the nature and scope of the proposed development, there are no requirements to undertake any further archaeological or heritage works to inform the proposals.

3.5 Flood Risk and Drainage

3.5.1 The works are located entirely within Flood Zone 1, an area of less than 0.1%, annual probability of flooding. In addition, the Site is in an area at very low risk of flooding due to surface water. Although the development will cause a slight increase in the impermeable area within the Site, there is not expected to be any increase in the risk of flooding to third party land.

3.5.2 As the Site covers an area of less than 1ha, in line with National Planning Policy Guidance, a flood risk assessment will not be required to support this planning application.

3.6 Highways and Traffic

3.6.1 During construction, there will be a minor temporary increase in traffic to the working area due to delivery of construction materials and the use of construction vehicles. This will only be required for the duration of the construction works, which are expected to take up to 9 weeks to complete. During the works, any vehicles will be parked within the agreed fenced off area.

3.6.2 During operation, due to the low maintenance nature of the asset, the proposed development will not require any additional visits from Cadent personnel and will only need access for periodic maintenance in line with the existing site requirements or in the event of an emergency. Parking will use existing parking facilities on adjacent roads. As such, there is not expected to be a significant permanent increase in operational traffic.

3.7 Noise

3.7.1 During construction, there is the potential for some additional noise source, however, any increase will be temporary and short in nature and will be mitigated by noise from the surrounding road network. As aforementioned, the replacement kiosk will be assembled off-site in order to further reduce construction time and associated noise impact.

3.7.2 All plant, vehicles and machinery will be maintained in good condition and will be switched off when not in use to minimise construction noise and pollution.

3.7.3 During operation, the new equipment is not expected to generate any new or increased noise levels above current background. As the gas governor will still be contained within a kiosk, there will no notable difference from the existing.

3.8 Dust

3.8.1 As the majority of the infrastructure to be installed will be assembled off-site, the anticipated dust emissions from construction will be low.

3.8.2 Nonetheless, best practice methods will be used to suppress construction dust which may be generated during the installation of the new governor and kiosk and all plant and machinery will be maintained in good condition and will be switched off when not in use to minimise pollution.

3.8.3 During operation, there are not anticipated to be any dust emissions from the development, similar to the existing on-site infrastructure. Therefore,

there is not expected to be any long-term and adverse impact on air quality as a result of the works.

4 Planning Policy Review

4.1 Environmental Impact Assessment Review

- 4.1.1 The proposed development is not considered to be Schedule 1 or 2 development under the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. The proposed development does not match any of the descriptions in either Schedule 1 or 2 and is also not considered to be located within a 'sensitive area' as defined by these regulations.

4.2 National Planning Policy Framework (2021)

- 4.2.1 The National Planning Policy Framework (NPPF) which was first published in March 2012, amended in July 2012, updated in February and June 2019 and more recently amended in July 2021, sets out the Government's planning policies for England and how these should be applied in planning decisions. Additionally, it sets out that planning law requires that applications for planning permission be determined in accordance with the Local Development Plan, unless material considerations indicate otherwise. The NPPF supersedes all previous planning policy and guidelines. The planning policies within the NPPF relevant to this planning application are given below:
- 4.2.2 Paragraph 11 states that:
- "Plans and decisions should apply a presumption in favour of sustainable development...for decision taking this means; approving development proposals that accord with an up-to-date development plan without delay".*
- 4.2.3 The NPPF defines sustainable development as having three dimensions or roles; economic, social and environmental. It is considered that the proposed development accords with all three. This is expanded on in Section 4.5.
- 4.2.4 Paragraph 38 goes on to indicate that:
- "Local planning authorities should approach decisions on proposed development in a positive and creative way...and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision makers at every level should seek to approve applications for sustainable development where possible".*
- 4.2.5 The planning statement sets out how the development aligns with the up-to-date development plan and sets out the policies that apply to the development detailed within Section 2.2 of this document.
- 4.2.6 Paragraph 20, under the heading 'Strategic Policies' states:

“Strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for...infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);

4.2.7 Under the subheading ‘Maintaining Effective Cooperation’, paragraph 25 states that:

“Strategic policy-making authorities should collaborate to identify the relevant strategic matters which they need to address in their plans. They should engage with their local communities and relevant bodies... county councils, infrastructure providers...”

4.2.8 Paragraph 26 goes on to say that:

“...In particular, joint working should help to determine where additional infrastructure is necessary...”

4.2.9 Paragraph 97, under the subheading ‘Promoting Healthy and Safe Communities’ suggests that:

“Planning policies and decisions should promote public safety and take into account wider security and defence requirements by:

- a) Anticipating and addressing possible malicious threats and natural hazards... Policies for relevant areas and the layout and design of developments, should be informed by the most up-to-date information available about the nature of potential threats and their implications. This includes appropriate and proportionate steps that can be taken to reduce vulnerability, increase resilience and ensure public safety and security; and*
- b) Recognising and supporting development required for operational defence and security purposes and ensuring that operational sites are not adversely affected by the impact of other development proposed in the area.”*

4.2.10 With reference to non-strategic policies, paragraph 28 states that:

“Non-strategic policies should be used by local planning authorities and communities to set out more detailed policies for specific areas, neighbourhoods or types of development. This can include...provision of infrastructure...”

4.3 Local Planning Policy

4.3.1 Section 38 of the Planning and Compulsory Purchase Act 2004 replicates the provisions of Section 54A of the Town and Country Planning Act 1990

(as amended) and requires that where in making any determination, regard is to be held to the Development Plan, and that determination shall be made in accordance with the Plan unless material considerations indicate otherwise.

4.3.2 The statutory development plan relevant to this application is the Manchester's Local Development Framework Core Strategy Development Plan Document adopted July 2012. The Core Strategy sets out the local planning policies used in determining planning applications for the City. Relevant Local Plan policies are set out below:

4.3.3 Policy SP1: Spatial Principles

"Development in all parts of the City should: -

- *Make a positive contribution to neighbourhoods of choice including:-*
 - *Creating well designed places that enhance or create character*
 - *Making a positive contribution to the health, safety and wellbeing of residents*
 - *...protect and enhance the built and natural environment*
- *...Ensure efficient use of natural resources and reuse previously development land wherever possible..."*

4.3.4 The proposed development is required to bring Cadent's existing gas infrastructure at Barlow Moor up to current standards and ensure that Cadent can meet future anticipated gas demands whilst also mitigating any health and safety risk to the public.

4.3.5 Whilst it is recognised that some vegetation and tree clearance is required in order to facilitate the works, the proposal demonstrates a well-designed space by re-using an existing site and retaining some screening to maintain the natural environment.

4.3.6 Policy CC 9: Design and Heritage

"Design of new buildings will need to be of the highest standard in terms of appearance and function..."

4.3.7 The proposed kiosk is the minimum size required to provide a 3m clearance around the new governor in accordance with industry standards and guidance. Furthermore, the kiosk has been designed to be similar to the existing and to minimise any visual impact of the development on the surrounding landscape.

4.3.8 Policy EN 3: Heritage

“Throughout the City, the Council will encourage development that complements and takes advantage of the distinct historic and heritage features of its districts and neighbourhoods...

New developments must be designed so as to support the Council in preserving or, where possible, enhancing the historic environment, the character, setting and accessibility of areas and buildings of acknowledged importance, including ... listed buildings, registered parks and gardens [etc]...”

4.3.9 The nearest listed building, Grade II listed ‘Manchester Crematorium Southern Cemetery Chapel’, is located 100m south-east of the Site and there is a Grade II Registered Park and Garden, ‘Manchester Southern Cemetery’ located 110m north-east. The proposed development is located predominantly within the limits of an existing operational site, and is the minimum size required to house the plant and meet the standards imposed by IGEM. The design will be functional in both scale and appearance and will use similar construction materials as those used by the existing site to minimise any potential visual impact. However, due to the screening provided by the existing fencing, buildings and vegetation between the Site and these heritage designations, the proposed development is considered unlikely to harm any heritage assets and therefore, accords with this policy.

4.3.10 Policy EN5: Strategic Areas for Low and Zero Carbon Decentralised Energy Infrastructure

“...The Council will work with all relevant stakeholders, which may include ... utilities companies... as appropriate, to bring forward such [energy infrastructure] plans.”

4.3.11 Policy EN 7: Energy Infrastructure Opportunities

“...In determining proposals for development, consideration will be given to the need to safeguard strategic energy sites and network routes, both proposed and existing, where these have been identified as having strategic significance for the delivery of low or zero carbon energy infrastructure or, would be required in order to achieve the successful regeneration of an area in line with targets for reducing carbon emissions.”

4.3.12 The proposed development is required in order to ensure a continued safe and resilient supply of gas to local residents and businesses. Gas is considered to be a low carbon emitter, cleaner than burning coal or oil. The Site at Barlow Moor Road is an integral component of Cadent’s distribution system and the loss of this asset alone would result is a loss of supply to 4 industrial loads, 199 commercial loads and 8352 domestic properties.

4.3.13 Policy EN 15: Biodiversity and Geological Conservation

“The Council will seek to maintain or enhance sites of biodiversity and geological value throughout the City. Particular consideration will be given to...:

- Others sites of biodiversity value, including Sites of Biological Importance (SBIs) and Local Nature Reserves (LNRs);*
- Protected and priority species, as listed in the Manchester Biodiversity Strategy and included in the Greater Manchester Biodiversity Action Plan;...*
- The Council’s objective to protect and conserve the City’s existing trees and woodlands and the aim for a net increase in trees across the City.*

Developers will be expected to identify and implement reasonable opportunities to enhance, restore or create new biodiversity, either on-site or adjacent to the site, contributing to the linkages between valuable or potentially valuable habitat areas where appropriate, with reference to...:

- The Manchester Tree Strategy.*

Any adverse impacts on biodiversity will need to be justified against the wider benefits of the proposal, assessed against other LDF policies. Where adverse impacts are unavoidable, developers will be required to provide appropriate mitigation and/or compensation.”

4.3.14 In order to facilitate the proposed development and allow for a 3m clearance in line with industry standards and guidance from IGEM, it is understood that some tree and vegetation clearance will be required. The works will be carried out in line with the recommendations of the PEA report (Appendix 1) as submitted alongside this statement.

4.3.15 In accordance with the recommendations of the Arboricultural Impact Assessment (Appendix 2), and the Greater Manchester’s Tree and Woodland Strategy¹, Cadent and their contractors will carry out works in line with the guidance set out within the BS 5837:2012, including ensuring adequate protection of trees to be retained during construction and exploring options for compensation as part of the planning process.

4.3.16 It is recognised that in order to facilitate the installation of the new kiosk, the loss of several low to moderate quality trees is required.

4.3.17 The loss of trees of these trees is considered to be outweighed by the public benefit of re-using an existing gas governor site and installing up-to-date

¹ https://www.cityoftrees.org.uk/sites/default/files/8082_All_our_trees_report_Dr8_MW.pdf

infrastructure which will provide a resilient and reliable supply of gas to Cadent's customers.

- 4.3.18 Due to the need to maintain a minimum clearance of 3m around the new governor, there is a clear inability to replant within the new compound. Nonetheless, Cadent would be open to exploring options for compensation as part of the planning process.

4.4 Manchester City Council Infrastructure Delivery Plan

- 4.4.1 The most recent version of the Infrastructure Delivery Plan (IDP) for Manchester City Council was published in February 2011. The IDP seeks to ensure that there is sufficient infrastructure and supply available for current and future development, including energy resources, such as gas.
- 4.4.2 Planning Policy Statement 12 advises that the IDP should identify where possible, infrastructure needs and costs, along with responsibilities for delivery.
- 4.4.3 There are no policies within the Manchester City Council IDP that are relevant to developments of this kind or to the responsibilities of Cadent as a statutory undertaker for the supply of gas.
- 4.4.4 However, in Section 3.0: Physical Infrastructure, under the subheading Infrastructure Requirements, it is stated that *"At the present time, there is sufficient energy to serve the City of Manchester. Under the gaze of Ofgem, the various generation/transmission/distribution companies are planning investment in their infrastructure... to ensure that this continues, in light of planned growth."*
- 4.4.5 In line with their existing obligations as a statutory gas undertaker and Cadent's programme to replace its <2bar gauge pressure district governors, Cadent are required to invest in their existing infrastructure network to build resilience of the system and continue to provide a safe and sufficient supply of energy to the local community.

4.5 Planning Policy Appraisal

- 4.5.1 Both national and local planning policy highlight the importance of forward planning to ensure that there is sufficient infrastructure and supply available for current and future development, including energy resources, such as gas.
- 4.5.2 The proposed development is required in order to replace the outdated and non-compliant gas governor at Barlowmoor Clen and to allow Cadent to continue to provide a safe and reliable supply of gas to its customers both now and into the future. This therefore aligns with paragraph 8 of the NPPF through a demonstrable accordance with the principle of sustainable development.

4.5.3 The NPPF sets out three objectives of sustainable development: economic, social and environmental. This proposal fulfils each objective as follows:

- **Economic:** In accordance with Cadent's duty, as per the Gas Act 1986, the proposal allows for the development and maintenance of an efficient and economic pipeline system for the conveyance of gas.
- **Social:** The Barlowmoor Clen governor site contributes to the supply of gas to 4 industrial loads, 199 commercial loads and 8352 domestic properties. The proposed development is therefore required to ensure that Cadent can continue to provide a safe and reliable supply of gas their customers which can meet anticipated peak 1 in 20-year winter scenarios.
- **Environmental:** The proposed development promotes the use of gas, considered to be a lower carbon emitting fuel than more traditional sources, such as coal and oil. The re-use of an existing site and land immediately adjacent will require less land-take than the use of a greenfield site. The location also makes use of its connection to the existing gas distribution network and pipework and is therefore, deemed to be the most sustainable location.

4.5.4 Policy EN 7 suggests that when determining proposals for development, consideration will be given to the need to safeguard existing strategic energy sites, such as the existing gas governor site at Barlowmoor Clen. This is supported by Section 3 of the IDP which recognises the importance of various generation, transmission and distribution companies, such as Cadent, investing in their existing infrastructure in order to continue to supply sufficient energy to serve the City of Manchester.

4.5.5 As aforementioned, the proposed development will make use of the existing gas governor site at Barlowmoor Clen and land immediately adjacent, thus avoiding the need to develop in alternative locations or on greenfield sites. The proposed development will also allow Cadent to continue to provide a safe and reliable support of gas to businesses, industry and residents both now and into the future. It is therefore considered that the proposed development accords with these policies.

4.5.6 As detailed in Policy EN5, the Council will work proactively with all relevant stakeholders, including utilities companies, to deliver energy infrastructure projects, as appropriate. Although Policy EN5 is referring specifically to low- and zero-carbon decentralised energy infrastructure, gas is considered to be a cleaner fuel than oil or coal and the Site at Barlow Moor Road is an integral component of Cadent's existing distribution system. The proposed works are therefore essential for allowing both Cadent and Manchester City Council

to continue to provide a safe and secure supply of gas to the local community.

- 4.5.7 Furthermore, paragraph 97 of the NPPF stresses the importance of reducing vulnerability, increasing resilience and ensuring public safety and security of the community. As the installation of the proposed kiosk to house the replacement gas governor will provide greater protection of a sensitive asset and ensure a continuous supply of energy to the local community whilst also mitigating a potential risk to public safety, the proposal is considered to be in line with this paragraph, as well as Local Plan Policy SP1.
- 4.5.8 The Site is located within the built-up area of Chorlton. As the Site is proposed predominantly within the existing gas governor site, its development will be in context with its existing land use. The proposed new kiosk has been designed to be functional in terms of scale and appearance and to minimise its visual impact as far as is reasonably possible.
- 4.5.9 It is recognised that in order to facilitate the proposed development, several low to moderate quality trees require removing. No high quality (Grade A) trees will be removed. The loss of these trees is considered to be outweighed by the public benefit of re-using an existing gas governor site and installing up-to-date infrastructure which will provide a resilient and reliable supply of gas to Cadent's customers. Nonetheless, Cadent would be open to discussing options for compensation with the Council.
- 4.5.10 As outlined above, we believe that the proposed development accords with both local and national planning policy. Furthermore, it is considered that the benefits of the development clearly outweigh any negatives and the application should therefore, be considered favourably based on its merits.

5 Conclusion

- 5.1.1 In accordance with international industry standards and guidance from IGEM/TD/13 Edition 2, Cadent are seeking full planning permission for the demolition of the kiosk and existing gas infrastructure at their Barlowmoor Glen site and the installation an uprated kiosk to house a replacement governor. As part of this planning application, Cadent are also applying for new weldmesh fencing, 2.4m in height, to be erected around the boundary of the site.
- 5.1.2 It is recognised that a small number of low to moderate quality trees will require removing in order to facilitate the proposed works. Works will be undertaken in line with best practice and the recommendations outlined within both the Arboricultural Impact Assessment and PEA report to ensure that any impact of the works is minimised as far as is reasonably possible.
- 5.1.3 This statement and the supporting information supplied alongside this application demonstrate that the proposed development accords with both national and local planning policy and guidance and environmental legislation. The proposal will ensure the continued safe and sufficient supply of gas to the local area by enhancing the resilience of the asset and mitigating any potential risk to public safety, thus outweighing any negative impacts that may result.
- 5.1.4 In view of the information provided within this statement, it is respectfully submitted that there are no material reasons why planning permission should not be granted.

Appendix 1: Preliminary Ecological Appraisal

Appendix 2: Arboricultural Impact Assessment



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