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Our Ref: ALDI DRS

Manchester City Council
Planning
PO Box
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Dear Sir/Madam,

ERECTION OF REVERSE VENDING MACHINE UNIT FOR RECYCLING PURPOSES AND ASSOCIATED WORKS ON BEHALF OF ALDI STORES LTD

On behalf of our client Aldi Stores Ltd ("Aldi"), please find enclosed an application for full planning permission as described above.

The planning application comprises the following documents.

- Application Form and Ownership Certificate;
- This Cover Letter;
- Location Plan (ref: ST56-LOCATION-PLAN-1000-P01);
- Existing Site Plan (ref: ST56-EXISTING-PLAN-1000-P01);
- Proposed Site Plan (ref: ST56-PROPOSED-PLAN-1011-P01)
- Proposed DRS Floor, Roof and Elevational Plans (ref: MB10-MB101)
- DRS Information Pack; and
- Noise Impact Assessment (ref: J3419-R1-AY-DRS)

This letter is in support of an application proposing the erection of a unit which will be used for the collection of plastic bottles and steel/aluminium cans. The proposal will facilitate the operation of the Government's Deposit Return Scheme, supporting national sustainability objectives, increasing recycling rates and providing a convenient collection facility for customers. This is required to comply with incoming legislation from the UK Government.

The Proposals

In January 2025, the UK Government announced the introduction of a deposit return scheme. This is to go live in October 2027. The purpose of the scheme is to improve the amount of recycling for drink containers (between 150ml and 3L). It also means that large scale retailers such as Aldi will have a legal requirement to accept returns of empty drink receptacles for recycling.

It will require all retailers who sell drinks in plastic bottles and steel/aluminium cans to apply a surcharge of 20p to these items, which is refunded when the empty container is returned. The vast majority of retailers who sell such products will be required to accept returns. Some retailers

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will be excluded (e.g. floorspace under 100 sqm), however, this exemption will not apply to Aldi given the physical size of its stores.

Aldi proposes to install Reverse Vending Machines (RVMs) that scan returned containers and issue vouchers that may be redeemed in store, exchanged for cash, or donated directly on the RVM to charity. In the case of Aldi, the chosen charity will be Teenage Cancer Trust. Due to the high volume of footfall in Aldi stores, there is expected to be a high use of these machines, with an average of c. 38,000 returns expected per store per week. The RVMs are available in a range of sizes and Aldi will seek to use the most suitably sized RVM at each store in order to meet the anticipated demand.

A layout plan of the proposed Deposit Return Scheme (DRS) unit has been submitted in support of this planning application.

Whilst the various DRS unit types Aldi are proposing to utilise differ in their overall footprint, all comprise lightweight metal structures finished in anthracite-coloured cladding. The largest unit measures approximately 5.3 metres by 8.8 metres, providing a maximum gross floorspace of approximately 46 sqm. The maximum height of the units is 3.1 metres, although both the floorspace and height vary depending on the specific unit type proposed. In this case, the DRS unit measures 2.8 metres by 3.4 metres, with a gross floorspace of 9.52 sqm and height of 2.7 metres.

All units incorporate a covered customer lobby positioned in front of the RVMs, providing weather protection for users. These customer lobby areas are glazed, creating an attractive and welcoming appearance whilst maintaining visibility and promoting natural surveillance.

Each DRS unit accommodates a minimum of two RVMs, enabling at least two customers to use the facility simultaneously and ensuring the efficient operation of the system during peak periods. In addition, all units are fitted with roller shutters, allowing the facility to be securely closed outside of store trading hours.

The proposed units have been specifically designed to provide a functional, durable and high-quality facility that integrates appropriately within the operational Aldi store environment whilst delivering the infrastructure necessary to support the Deposit Return Scheme. The scale, design and appearance of the units are considered proportionate to their intended use and appropriate within the context of a modern retail setting.

Due to the size of the units and the typically highly efficient layout of an Aldi store, a significant number of internal alterations would be required to facilitate an internal solution within the building. This format also provides a better customer experience being DRS > Trolley > Shop. Therefore, it is necessary to accommodate these units external to the store, in this case within the store car park, at the front of the store.

The RVM units will be serviced by Aldi staff working at the subject store, meaning no requirement for vehicles to service the unit directly. When returns are processed by the RVM they are sorted into a plastic surround that sits on top of a standard European pallet. Once these are full, store staff will remove the container and replace it with an empty one. The full container is then wheeled into the store warehouse using a manual pump truck until it is collected from the loading dock. It is envisaged that full containers will be collected by an Aldi HGV once it has completed its delivery to the store and it will then be returned to the regional distribution centre for onwards processing.

For Aldi staff to efficiently service the unit, this process will ideally need to be undertaken in the hour before the store opens or the hour after it closes. This is to ensure that the servicing does

not impact upon the hours of which the majority of customers are anticipated to use the unit. The RVM units will therefore be operational (including for servicing) during daytime hours only (07:00 to 23:00), with public access being tied to the trading hours of the store. Furthermore, all RVM units include closable roller shutters, which will be used to secure the unit when the store is closed. This will ensure that no adverse impacts on the amenity of any adjacent properties would arise during the operation of the RVM units.

It should also be noted that a similar DRS scheme operates across Ireland, Europe and Australia. Aldi therefore has extensive experience in the safe and efficient operation of similar RVMs, the learnings of which have been incorporated into the delivery of the DRS scheme for England, Scotland and Wales.

Full details of the DRS scheme and Aldi's response to this are included within the supporting information to this application.

Permitted Development Rights

To support the implementation of the Deposit Return Scheme, it is important to note that in March 2026, the UK Government introduced a new permitted development right for reverse vending machines as set out in "*The Town and Country Planning (General Permitted Development etc.) (England) (Amendment) Order 2026 No. 313*". This order introduced a new class CA (Installation etc. of a reverse vending machine) into Part 7 of Schedule 2 of the GDPO, with a purpose to allow the installation of such machines, subject to conditions. These permitted development rights ("PDR") came into force on 9th April 2026 and address potential planning barriers which could otherwise impact on retailers' ability to fulfil their statutory obligations under the deposit return scheme.

This allows the installation of reverse vending machines for the purpose of the DRS scheme to be installed within a wall of or within the curtilage of a shop. To help manage any potential impacts and protect local amenity, the right is subject to limitations meaning development is not permitted by this class if:

- *(a) the gross floor space of the reverse vending machine would exceed 80 square metres;*
- *(b) the height of the reverse vending machine would exceed 4 metres;*
- *(c) in the case of a reverse vending machine installed, or to be installed, in a wall of a shop, where any part of the reverse vending machine would protrude 2 metres or more beyond the outer surface of that wall;*
- *(d) where any land adjacent to the shop is used for a purpose within Part C of the Schedule to the Use Classes Order (residential purposes), any part of the reverse vending machine would be within 15 metres of the boundary of the curtilage of that residential land;*
- *(e) any part of the reverse vending machine would face onto and be within 5 metres of a highway; or*
- *(f) any part of the reverse vending machine would be—*
  - *(i) on article 2(3) land;*
  - *(ii) in a site of special scientific interest;*
  - *(iii) within the curtilage of a listed building; or*
  - *(iv) on the site of a scheduled monument.*

In addition to the above conditions, the PDR also includes interpretations, which are of relevance, as follows:

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*"**reverse vending machine**" means a machine for the purpose of accepting deposit items, reimbursing deposits for each deposit item accepted, and retaining the deposit item for collection and any associated enclosure, building, canopy or other structure;*

*"**shop**" means a building used for any purpose within Class E(a) (display or retail sale of goods other than hot food) of Schedule 2 to the Use Classes Order."*

Whilst Aldi are utilising a variety of different RVM units depending on the store, all units comply with criteria a) and b) of the above PDR. However, as part of the preparation to install RVMs at this store, it has been identified that the proposed location does not comply with one or more of these criteria, and therefore planning permission is required on the basis that the site is located within Blackburn Park Conservation Area. Therefore, the installation of the DRS unit does not meet criterion F of Class CA 'Installation etc. of a reverse vending machine' Part 7 of Schedule 2 of The Town and Country Planning (General Permitted Development etc.) (England) (Amendment) Order 2026 No. 313 (GPDO).

Planning Assessment - Key determining issues

Principle of Development

As noted above, the UK Government has introduced a new permitted development right for RVMs to support the implementation of the Deposit Return Scheme and to help retailers fulfil their statutory obligations under the scheme. To this end, there is strong support in principle for the proposals on the basis that they will:

- Promote the circular economy;
- Reduce waste sent to landfill;
- Be ancillary to, and compatible with, an existing retail use;
- Provide a community environmental benefit;
- Encourage sustainable consumer behaviour; and
- Contribute to environmental objectives and net-zero ambitions.

Aside from the principle of development, and as noted above, planning permission is required in this case because the site is located within Blackburn Park Conservation Area and does not meet Criterion F of Class CA of the GPDO. This gives rise to the following key issues which are addressed further below:

- Residential Amenity;
- Heritage;
- Design.

Residential Amenity (criterion d)

To support the application, a Noise Impact Assessment has been undertaken to consider the potential noise effects associated with the proposed DRS installation.

The assessment concludes that noise arising from the operation and servicing of the DRS unit during daytime hours is unlikely to have a detrimental effect on, or unduly impact the amenity of, any Noise Sensitive Receptor (NSR), unless an openable window serving a residential property is

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located within 3-metres of the unit. Mitigation measures would only be required in such circumstances. For the avoidance of doubt, the 3-metre separation distance is measured between the Reverse Vending Machine (RVM) itself and an openable residential window.

A copy of the Noise Impact Assessment has been submitted as part of this planning application.

Aldi is seeking approval for the daytime operation and servicing of the RVM unit. All units are equipped with lockable roller shutters, which will be closed when the store is not trading. Aldi does not operate any stores on a 24-hour basis, with the majority of stores opening between 08:00 and 22:00 on weekdays. This approach ensures that the DRS unit will not generate noise during night-time hours (23:00 to 07:00) and therefore will not adversely affect the amenity of any neighbouring residential properties.

The unit will be serviced by Aldi staff, removing the need for dedicated servicing vehicles to access the installation directly. Containers returned through the RVM are sorted into a storage cage positioned on a standard European pallet. Once full, the container is removed and replaced with an empty unit. The full container is then transported to the store warehouse using a manual pump truck, to await onward collection. It is anticipated that containers will be collected by an Aldi HGV following its scheduled delivery to the store and returned to the regional distribution centre for onward processing.

To ensure the efficient operation of the system, servicing activities may occasionally be required during the hour before the store opens or the hour after it closes. This approach minimises disruption to customers during peak trading periods and ensures the unit remains fully operational throughout store opening hours.

The Noise Impact Assessment demonstrates that both the operation and servicing of the DRS unit can be undertaken at any time during daytime hours (07:00 to 23:00) without giving rise to any unacceptable impacts upon neighbouring occupiers, as there are no openable residential windows located within 3-metres of the unit.

Therefore, the proposals comply with Local Plan Policies DM1 (Development Management) JP-P1 (Sustainable Places) and NPPF Policy P3: Living Conditions and Pollution.

Heritage/Environmental Designations (criterion f)

The proposed development comprises the installation of a Deposit Return Scheme (DRS) unit adjacent to the south-eastern elevation of the existing Aldi foodstore. The proposal forms part of a wider Government initiative aimed at increasing recycling rates and promoting sustainable waste management practices. No other alterations are proposed to the building or wider site.

Given the modest scale and functional nature of the proposal, the development will not result in any material change to the established character of the site. The DRS unit will be accommodated within the existing commercial setting of the foodstore and associated car park, where it will read as a subordinate and ancillary feature to the principal building.

As illustrated on the submitted elevation drawing (Ref. MB10 MB101), the DRS unit is limited in scale and designed to integrate with its surroundings. The accompanying Aldi DRS Information Pack demonstrates that the unit adopts a simple and contemporary appearance, appropriate within the context of a modern retail environment.

The structure will be finished in durable anthracite-coloured cladding and will incorporate a glazed customer waiting area. The restrained palette of materials and understated design ensure that the unit complements the appearance of the existing store without appearing visually prominent or incongruous. Furthermore, the proposal will not obscure key architectural features of the building or interrupt important views within the Conservation Area.

Although positioned to the front of the store, the DRS unit will be viewed in the context of the existing foodstore frontage, car parking area, customer trolley bays and associated commercial infrastructure. As such, it will not appear out of character with its surroundings and will not detract from the visual amenity of the area.

Importantly, the proposal does not involve any works to, or physical encroachment upon, nearby heritage assets, nor does it affect their appreciation or significance. The DRS unit will remain clearly ancillary to the existing retail use and, owing to its modest scale, design and location, will have a neutral effect on the setting of the Blackburn Park Conservation Area and surrounding listed buildings. Consequently, the proposal gives rise to no harm to the significance of designated heritage assets.

In summary, the proposal represents a minor operational enhancement to an existing foodstore, delivering environmental benefits through the facilitation of recycling while preserving the character and appearance of the Conservation Area. The development is therefore considered to preserve the significance of nearby heritage assets and maintain the special character of the Blackburn Park Conservation Area.

Accordingly, the proposal accords with Policy CC9 (Design and Heritage), Policy EN3 (Heritage) and Policy JP-P2 (Heritage) of the Development Plan, together with the heritage objectives of the National Planning Policy Framework, including Sections 16 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 and Chapter 16 of the NPPF.

Design

Regarding design, the proposed DRS unit represents a modest addition within an established Aldi store environment and will be viewed in the context of the existing foodstore, car park and associated customer facilities. The unit is clearly subordinate to the main building and is of a scale appropriate to its operational function. The proposals comply with inclusive design principles by retaining adequate space around the unit and retaining accessible pedestrian routes. Its location will not give rise to any barriers for wheelchair uses or those with mobility impairments

In terms of appearance, the unit will be finished in durable anthracite-coloured cladding and incorporates a glazed customer waiting area, creating a modern and high-quality design consistent with the contemporary appearance of Aldi stores nationwide. The simple palette of materials and understated design ensure that the development complements the existing store environment whilst maintaining a professional and welcoming appearance for customers.

Given its limited scale, high-quality design and location within an operational foodstore site, the proposal will not result in any material harm to the character or appearance of the area.

The development therefore represents an appropriate and proportionate addition to the site which successfully balances operational requirements with good design principles.

The proposal is therefore considered to accord with Local Plan Policy EN1 (Design Principles and Strategic Character Areas) and JP-P1 (Sustainable Places) and NPPF Policy DP3: Key Principles for Well-Designed Places.

Reflecting on the above, and in our submission, the proposals comply with relevant policies of the Development Plan, namely the Manchester Core Strategy (2012) and Places for Everyone (2024), together with relevant policies of the NPPF being an up-to-date expression of Government planning policy and therefore a key material consideration.

Summary

Our client is seeking planning permission for the installation of a reverse vending machine in order to comply with incoming legislation from the UK Government requiring retailers to accept returns of empty containers for recycling.

The proposed RVM would represent a sustainable form of development that supports recycling and waste reduction objectives whilst providing a valuable facility for customers and the local community. The development would be ancillary to the existing retail use of the site and would not result in any unacceptable impacts from the determining issues considered in the planning assessment above. Any identified impacts are considered to be limited in nature and significantly outweighed by the environmental and community benefits arising from this proposal. The application therefore accords with the aims of the development plan and the presumption in favour of sustainable development, and we respectfully request that planning permission should be granted.

If any further information is required, please contact the named person as per the application form.

Yours faithfully

[redacted]

Avison Young (UK) Limited

For and on behalf of Aldi Stores Ltd.