



**PLANNING, HERITAGE AND DESIGN AND ACCESS
STATEMENT**

On behalf of Shepley Engineers Limited

For the installation of 1 no. upstand fitted with 2 no. 7kW electrical outlets for the charging of electric vehicles, associated cabling and ancillary works, including the installation of a vehicle protection barrier around the upstand.

**Car Park Area at The Old Town Hall, Duke Street,
Whitehaven, CA28 7NU**

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Our Ref: Clarke EV Shepley Whitehaven

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1.0 INTRODUCTION

- 1.1** Clarke EV (a division of Clarke Telecom Limited) are an OLEV and NICEIC-accredited electric vehicle charge point solution provider.
- 1.2** Electric car sales rose by an impressive 43% (to more than 3 million) in 2020, despite the COVID pandemic. With the increase in electric vehicles on the road paired with targets to make almost half of all UK cars electric by 2030, and the government's ban on the sale of Internal Combustion Engine (ICE) cars from this date, there are a lot of necessary changes needed to ensure that the charging infrastructure aligns with the number of electric vehicles on the road to provide sufficient charging facilities.
- 1.3** Currently, 75% of electric vehicle owners are unable to charge their car at work in the UK. A lack of EV charging facilities at workplaces also reduces the amount of companies who are able to implement electric vehicles into their business fleets. A lack of workplace charging facilities also disincentivises staff members from making the move to EV.
- 1.4** There is, therefore, a significant need to improve EV charging infrastructure across the UK.
- 1.5** Clarke EV have been instructed by their client Shepley Engineers Limited in relation to the installation of an upstand fitted with a dual 7kW charging outlet in the car park area of their offices at The Old Town Hall, Duke Street, Whitehaven.
- 1.6** The Old Town Hall is a Grade II Listed Building. As the proposed electrical upstand will be located within the curtilage of the Listed Building, it requires an application for full planning permission.
- 1.7** As detailed in Section 3 of this Statement, it has been confirmed by the Local Planning Authority that a Listed Building Consent application is not required in this case.
- 1.8** This Statement comprises a Planning Statement, Heritage Statement and Design and Access Statement.

2.0 SITE AND SURROUNDINGS

- 2.1** The Old Town Hall is located on Duke Street in the town of Whitehaven, Cumbria. The immediate area surrounding the site is mixed use, comprising of predominantly residential use to the north-east and north-west. The Three Tuns Public House is located directly to the north of the application site, and the Whitehaven Archive and Local Studies Centre is located directly to the south.
- 2.2** The building is currently in use as offices for the applicant, Shepley Group.

Heritage

- 2.3** The south-west side of the Old Town Hall building was constructed circa. 1814, with further additions in 1851 to incorporate parts of a late 17th Century building.
- 2.4** The building was designated as a Grade II Listed building on 13th September 1972 (List Entry Number 1086779). It forms part of a Listing group with Nos 43-50, 52-55 and 65-76 Duke Street.



Figure 1: Screenshot taken from Historic England website showing the application site (outlined in Red). Other nearby listed buildings are denoted by a small blue triangle.

- 2.5** The site is also located within the Whitehaven Town Centre Conservation Area.

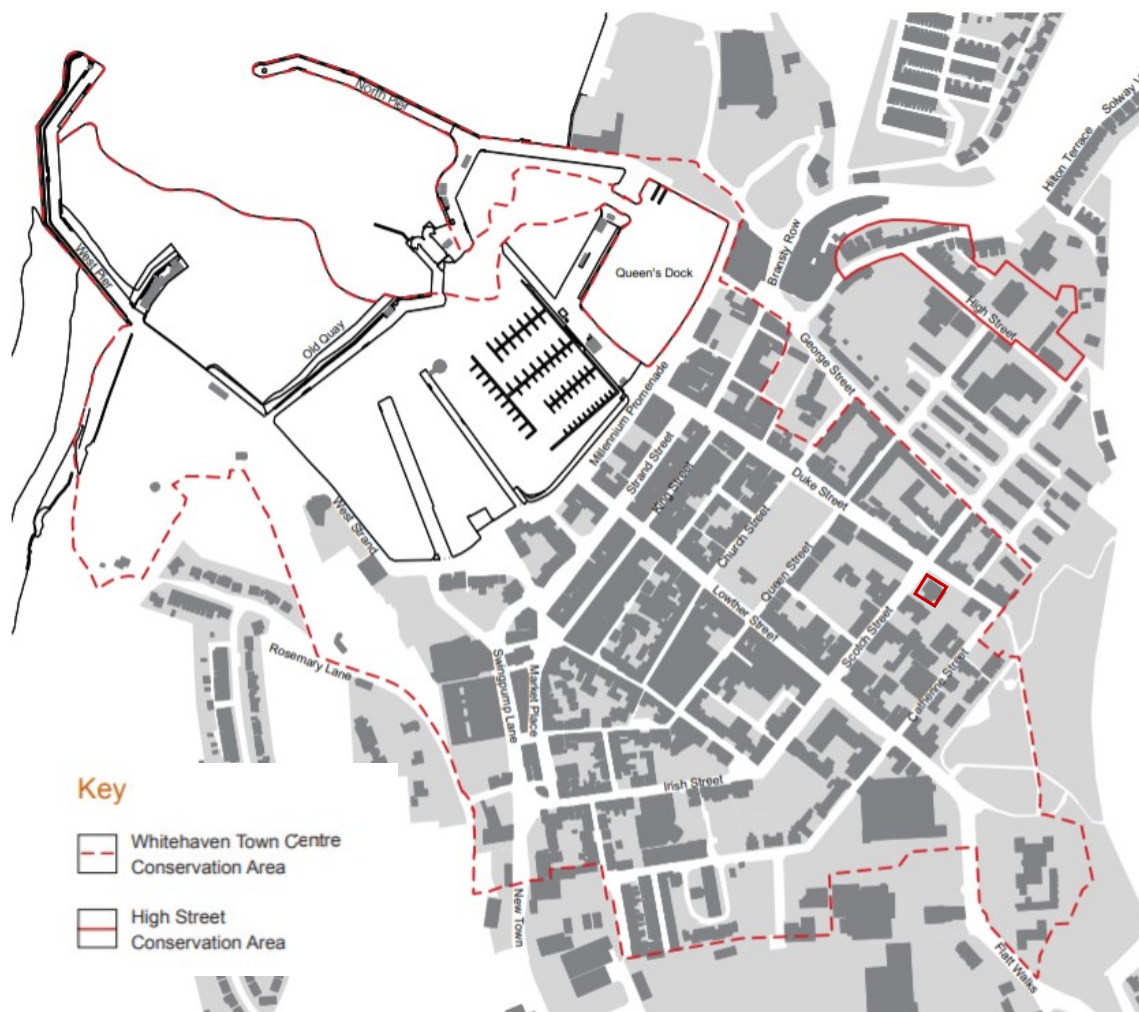


Figure 2: Screenshot taken from Whitehaven Town Centre and High Street Conservation Areas Character Appraisal document (Source: Copeland Borough Council) showing the boundaries of the Conservation Areas. Application site outlined in Maroon.

- 2.6** The Conservation Area appraisal notes that the building is now known as ‘The Cupola’. It describes the building, at the corner of Duke and Scotch Street, as an example of ‘renegade development’ carried out by Whitehaven’s wealthier inhabitants who refused to cooperate with Sir John Lowther’s vision for the town. The building is set back from the main frontage of Duke Street, unlike other surrounding buildings. It is recognised as a well-loved building by local Whitehaven residents.

3.0 PLANNING BACKGROUND AND HISTORY

3.1 A full planning and listed building consent application, to carry out a change of use of the building to office accommodation and associated works, was approved in August 2014.

3.2 No previous applications for the installation of EV charging points have been identified at the application site or in its immediate surrounds.

3.3 A meeting took place on site at the Old Town Hall with Samuel Woodford, Conservation and Design Officer at Copeland Borough Council, on Thursday 15th April, to discuss the proposal.

3.4 An email from Samuel Woodford on 22nd April, following the meeting, stated:

"I've been advised by my colleague that planning permission will be required for this work. Reviewing again the document you previously sent, I've concluded that there is no need for listed building consent in this case as the basement level cabling is all quite superficial and won't have an effect on the significance of the building..."

You'll need the usual supporting docs – location and block plan along with some details of the charge points. The document you previously sent showing the route of the cabling and steps needed to get it outside would be very helpful too."

3.5 The document referred to in the email from Mr Woodford, which shows the route of the cabling and the methodology, is submitted as part of the application supporting documentation ('Site layout and methodology'), alongside a set of drawings.

4.0 THE PROPOSAL

- 4.1** The proposal comprises of the installation of 1 no. upstand fitted with 2 no. 7kW electrical outlets for the charging of electric vehicles, associated cabling and ancillary works, including the installation of a vehicle protection barrier around the upstand.
- 4.2** The upstand will measure 1583mm in height, with a base of 250mm x 150mm fixed to the ground and will host 2 no. 7kW electrical outlets to allow for the charging of electric vehicles. The outlets will each measure 180mm (W) x 170mm (D) x 450mm (H). The upstand and electrical outlets will be coloured Black.

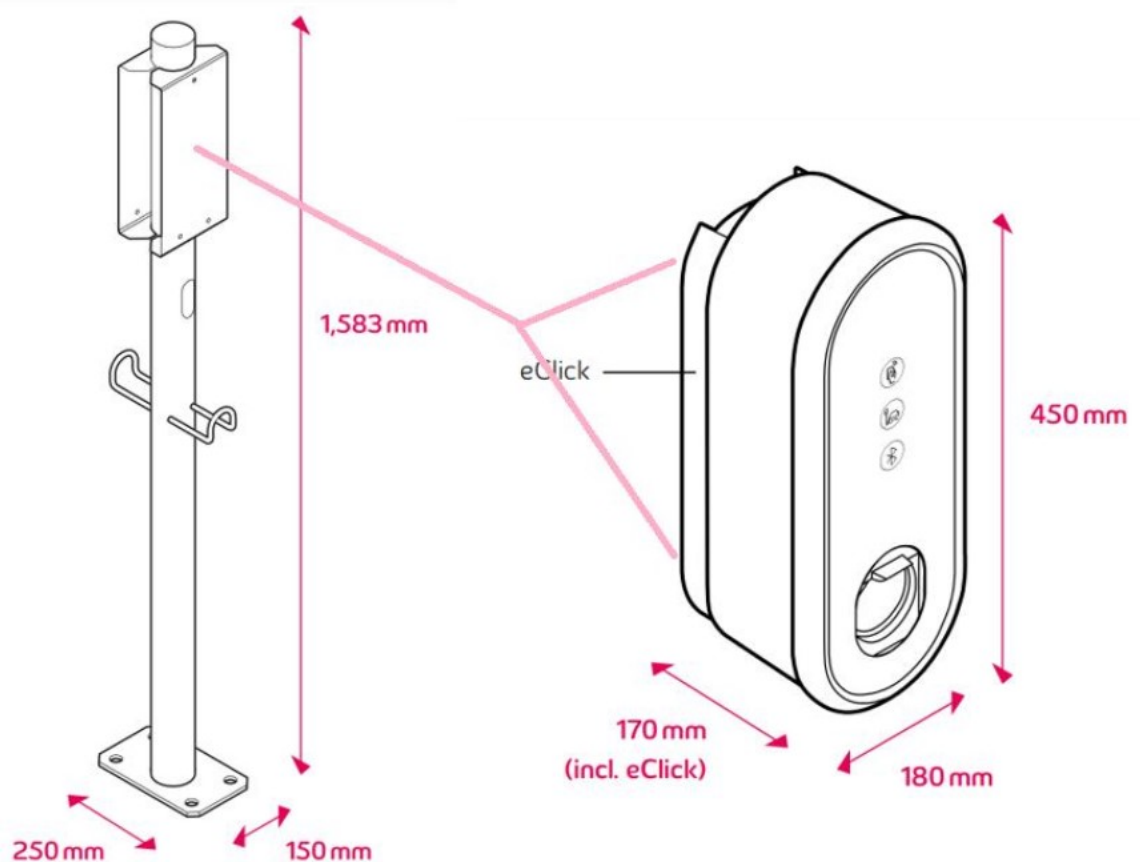


Figure 3: Specification of upstand and electrical outlets to be installed.

- 4.3** It is also required to install a Vehicle Protection Barrier around the upstand for health and safety purposes. The barrier will measure 575mm in height and 500mm in diameter. It will be coloured Yellow.

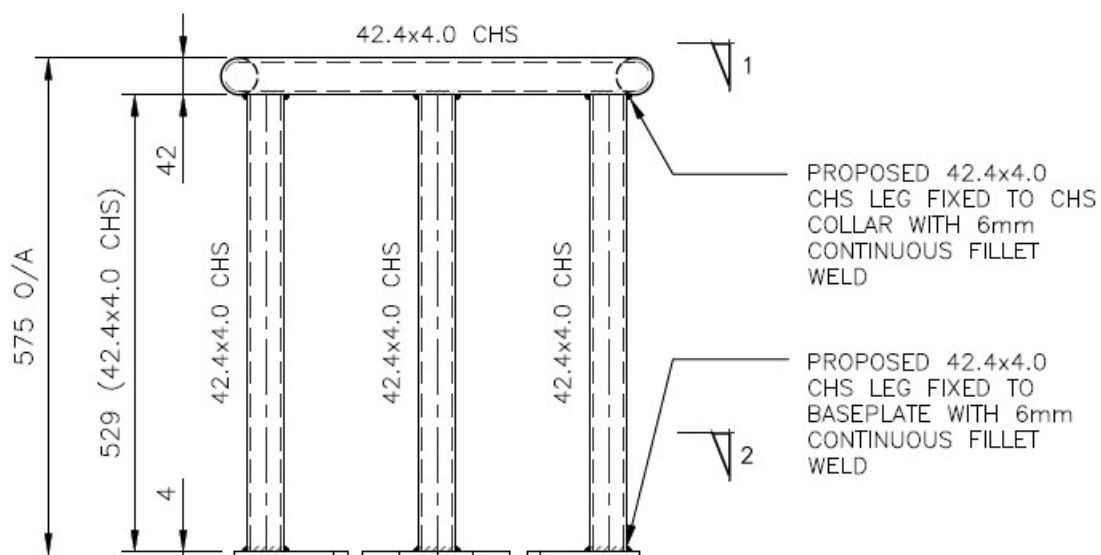


Figure 4: Diagram of Vehicle Protection Barrier with dimensions.

4.4 The following image shows an installation of equipment identical to that which is proposed, in situ at a site in Darlington.



Figure 5: Image of proposed equipment in situ at existing site in Darlington.

4.5 New power cabling is also required to be installed. It will be run at a high level and cleated to

the wall from the existing plant room, through the basement area, and will exit the building through the rear door. It will then be taken underneath the foundations of the safety rail so that no cabling is visible externally above ground level.

- 4.6** A full scope of works and methodology can be found in the 'Site Layout and Methodology' document which is submitted as part of the application supporting documentation.

Access

- 4.7** Access to the proposed equipment will be restricted to users of the car park. The car park is entered and exited via Duke Street and has an electronic bollard system in place.

5.0 NATIONAL PLANNING POLICY AND NATIONAL GUIDANCE

Introduction

- 5.1 Planning policy is provided at the national level by the National Planning Policy Framework (NPPF). It is a material consideration in planning decisions.

National Planning Policy Framework (February 2019)

- 5.2 The Government's National Planning Policy Framework (NPPF) was published on 24 July 2018 and updates the 2012 version. In February 2019 the NPPF was revised slightly, with minor alterations to wording relating to housing supply. The NPPF places a high level of importance on sustainable development and is very supportive of the need for sustainable transport. Indeed, a whole chapter is dedicated to promoting sustainable transport, emphasising the importance that the Government attaches to it.
- 5.3 Paragraph 11 of the National Planning Policy Framework sets out "*The presumption in favour of sustainable development*". It states that plans and decision should apply a presumption in favour of sustainable development, and sets out that, when making a decision on an application, the application should be approved if it accords with an up-to-date development plan without delay, or, where there is no up-to-date development plan policies, it should be granted unless it does not comply with the policies in the NPPF or where the adverse impacts of the proposal would outweigh the benefits when assessed against the NPPF as a whole.
- 5.4 Section 9 of the National Planning Policy Framework is in relation to 'Promoting sustainable transport.' Paragraph 105 states that local planning policies should take into account the need to ensure an adequate provision of spaces for charging plug-in and other ultra-low emission vehicles. Paragraph 110 states that applications for development should be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible, and convenient locations.
- 5.5 Section 16 of the NPPF relates to 'Conserving and enhancing the historic environment'. Paragraph 190 states:
- "Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset), taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation*

and any aspect of the proposal.”

5.6 Paragraph 192 goes on to state that:

“In determining planning applications, local planning authorities should take account of:

The desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;

The positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and

The desirability of new development making a positive contribution to local character and distinctiveness.”

5.7 With regard to the impact of proposals on the significance of a heritage asset, paragraphs 193 and 194 are relevant and read as follows:

“193 – When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.”

“194 – Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of:

Grade II listed buildings, or Grade II registered parks or gardens should be exceptional;

Assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, Grade I and II listed buildings, Grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.”*

5.8 In the context of the above, it should be noted that paragraph 195 reads as follows:

“Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh harm or loss, or all of the following apply:

The nature of the heritage asset prevents all reasonable uses of the site; and

No viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and

Conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and

The harm of loss is outweighed by the benefit of bringing the site back into use.”

5.9 Paragraph 196 goes on to state that:

“Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.”

Road to Zero Strategy

5.10 The Road to Zero Strategy was published by HM Government in July 2018. It sets out the Government’s long-term ambitions and policies in relation to cleaner roads and zero emission vehicles.

5.11 The Government aim is for all new cars and vans to be zero emission by 2040. The sale of new conventional petrol and diesel cars and vans will end by 2040 and all new cars and vans sold by then will be 100% zero emission. By 2050, they want almost every car and van on the road to be zero emission. By 2030, the Government want to see between 50-70% of new car sales and up to 40% of new van sales being ultra-low emission vehicles.

5.12 In order to meet these aims, the necessary infrastructure is required. Chargepoints need to be available where people live, work and travel, and a ‘fit for purpose infrastructure network’ needs to be available. The Government state in their strategy that they will support the development of ‘one of the best electric vehicle infrastructure networks in the world’ by ensuring that new build houses and non-residential buildings are electric vehicle ready with charging facilities, that chargepoints are easily accessed and used across the UK, and that streets are futureproofed to ensure that all new street lighting columns include charging points.

Consultation for delivery of Road to Zero Strategy commitments

5.13 In July 2019, the Government began a consultation which set out how they propose to deliver the commitments identified in the Road to Zero Strategy. The main areas of the consultation were based on requirements to include a chargepoint with every new residential building to be built with an associated car parking space, to include a least one chargepoint

for every five space at new non-residential buildings, and to retrofit at least one chargepoint at every non-residential building with more than 20 car parking spaces.

- 5.14** The inclusion of questions regarding retrofitting car parking facilities with chargepoints at existing non-residential buildings is particularly relevant, as it demonstrates that the Government recognises the importance of this as a way of meeting their aims.
- 5.15** The feedback from the consultation is still being analysed at this time.

Clean Air Strategy 2019

- 5.16** The Clean Air Strategy 2019 was published by the UK Government in January 2019. The strategy shows how the UK can tackle all sources of air pollution, making our air healthier to breathe, protecting nature and boosting the economy.
- 5.17** The Strategy identifies the move towards electric vehicles as a way of tackling climate change and improving air quality, as the move supports decarbonisation.
- 5.18** It is stated in Section 5.3 of the Strategy that Highways England are already taking a number of steps to improve air quality on the Strategic Road Network, including ensuring that 95% of the network will have a chargepoint for electric vehicles every 20 miles.

Electric Vehicles and Infrastructure Research Briefing (House of Commons Library)

- 5.19** In June 2021, a Commons Library Research Briefing paper was published based on electric vehicles and infrastructure. It provides an overview of what electric vehicles are and why they are needed, and what infrastructure is required to support the growth of electric vehicle ownership. It also contains case studies of successful electric vehicle usage in Norway, Iceland, The Netherlands and California.
- 5.20** The paper states:

“Without enough chargepoints EV ownership is not practical... The number of chargepoints will need to increase further to match the rising number of EVs on the road.”

6.0 THE DEVELOPMENT PLAN

Introduction

6.1 Section 38 (6) of the Planning and Compulsory Purchase Act 2004 states that “If regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise”.

6.2 The statutory development plan as defined by the Planning and Compulsory Purchase Act 2004 comprises the Copeland Borough Council Core Strategy and Development Management Policies DPD and a number of ‘saved’ policies from the Copeland Local Plan 2001-2016.

Copeland Borough Council Core Strategy and Development Management Policies DPD

6.3 The Core Strategy and Development Management Policies DPD was adopted in December 2013. It forms part of the Council’s development plan and sets the planning policies under which development control decisions will be taken.

6.4 The Core Strategy and Development Management Policies DPD does not contain any policies directly in relation to electric vehicle charging infrastructure, and therefore the NPPF should be consulted.

6.5 Policy ST1 of the DPD outlines the Strategic Development Principles for the borough. One of these is environmental sustainability, and within this section it states that one of the principles that underpins the Borough’s planning policies is to support the provision of sustainable transport infrastructure.

6.6 The DPD contains Policy ENV4 which is in relation to the protection and enhancement of the Borough’s heritage assets. The policy aims to protect listed buildings, conservation areas and other townscape and rural features which are considered to be of historic, archaeological or cultural value.

‘Saved’ policies from the Copeland Local Plan 2001-2016

6.7 There are no ‘saved’ policies from the Copeland Local Plan which are relevant in the determination of this application.

7.0 PLANNING & HERITAGE ASSESSMENT

- 7.1** The main issues arising from this planning application are whether the proposed development would be detrimentally prominent within the streetscene and unduly harmful to the character and visual amenity of the Listed Building, Conservation Area or wider surrounding area, and whether this harm would outweigh the significant benefits associated with the provision of an EV chargepoint, and other valid material considerations as outlined within NPPF.
- 7.2** There is currently a shortage of EV chargers to support in the increase in EV vehicle purchases. The number of chargepoints needs to increase, as outlined in the Electric Vehicle and Infrastructure Research Briefing referenced in Section 5 of this Statement. In 2020, a survey found that there were a total of 34,360 charge points in the UK. In 2018, this equalled 1 for every 4.6 EV cars, but in 2020 equalled just 1 for every 8.2 EV cars. Evidently, in order to support the increase in the number of electric vehicles on our roads, more infrastructure is required. This is supported by the NPPF and Copeland's Core Strategy and Development Management Policies DPD, which lists the provision of sustainable transport infrastructure as one of the Borough's principles.
- 7.3** The Old Town Hall has recently been converted to office use following planning permission being granted in August 2014 (LPA references 4/14/2260/0F1 and 4/14/2261/0L1). EV installations at offices are becoming more commonplace, as more companies commit to buying electric fleet vehicles, and as more employees purchase electric cars. The proposed installation will enable fleet vehicles to be charged overnight on the premises and will allow employees to charge their own vehicles during the day, which promotes sustainable transport fully in line with Policy ST1 of the Copeland Core Strategy and Development Management Policies DPD.
- 7.4** The installation will be located in the existing car parking area at The Old Town Hall, to the rear of the building. The main public views of the Old Town Hall are of its frontage from Duke Street. The proposed installation will not be visible from public vantage points due to its positioning; it will be shielded from views on Duke Street due to the shape of the building and from views on the footpath between the application site and Whitehaven Archive and Local Studies Centre by the boundary wall in situ around the car park. As such, it is considered that the proposal will cause no harm to the Whitehaven Town Centre Conservation Area, in full accordance with Policy ENV4 of the Copeland Core Strategy and Development Management Policies DPD.
- 7.5** Care has been taken to ensure that the proposed charging point is located in a way which

minimises the impact of the associated cabling, which runs back into the building. The 'Site layout and methodology' document submitted as part of the application supporting documentation sets out the routing in detail.

- 7.6** Samuel Woodford, Conservation and Design Officer at Copeland Borough Council, confirmed by email on 22nd April 2021:

"I've been advised by my colleague that planning permission will be required for this work. Reviewing again the document you previously sent, I've concluded that there is no need for listed building consent in this case as the basement level cabling is all quite superficial and won't have an effect on the significance of the building."

- 7.7** As such, it is considered that there will be no harm to the Grade II Listed Old Town Hall, in full accordance with Policy ENV4 of the Copeland Core Strategy and Development Management Policies DPD.

8.0 SUMMARY

- 8.1** The proposal relates to the installation of an electric vehicle chargepoint in the car parking area of The Old Town Hall, off Duke Street in Whitehaven. Great care has been taken to position the proposed chargepoint in a way that will ensure it is not visible from public vantage points, in order to protect the character of the Whitehaven Town Centre Conservation Area and the historic importance of The Old Town Hall building, given its Grade II Listed designation.
- 8.2** The Government aim is for all new cars and vans to be zero emission by 2040. It is imperative that the infrastructure is in place to support this aim and ensure that vehicles can be charged when and where required.
- 8.3** As demonstrated in Section 7 of this Statement, the proposal fully complies with NPPF policies relating to sustainable development and promoting sustainable transport, as well as local planning policies in the Copeland Borough Council Core Strategy and Development Management Policies DPD. It also complies with the Road to Zero Strategy and Clean Air Strategy published by the Government.
- 8.4** The proposal has taken into account the historic importance of the application site, which is a Grade II listed building located within a Conservation Area, to ensure that the heritage assets are preserved as far as practicable. As such, the proposal is also in accordance with Section 16 of the NPPF and the relevant Copeland Borough Council Core Strategy and Development Management Policy DPD policy relating to heritage.
- 8.5** It is considered that the benefits of providing infrastructure that will allow EV charging in this location would outweigh any perceived harm, and permission should be granted as such.