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Our reference: CSC1038

Dear Sir/Madam,

MOTOR FUEL GROUP
WICK SERVICE STATION, 81 LONDON ROAD, WICK, BS30 5SJ

Introduction

We write on behalf of Motor Fuel Group with regard to the application for the creation of an EV charging zone, substation enclosure and associated forecourt works at Wick Service Station. This application follows a previous submission made in November 2022 for a larger form of development (ref: P22/06631/F). That proposal was withdrawn following negative comments from the case officer and landscape officer. A pre-application submission was made in March 2023 (ref: PRE23/0143) but, despite chasing, no response has been received.

Site Description

The application site is formed of an existing service station (*Sui Generis*) located at 81 London Road, Wick, BS30 5SJ. The service station is adjacent to A420 and is within the Green Belt.

Background / Proposal

The UK has committed to reducing greenhouse gas emissions by 28% by 2035 and moving to Net Zero by 2050. As part of the Net Zero strategy (October 2021), the UK Government have placed a new emphasis on electric vehicle charging infrastructure in the UK. As part of this drive, it is essential that there is a comprehensive and competitive EV charging network in place. Although difficult to know precisely how much charging will be needed, forecasts suggest that at least 280 to 480,000 public charge points will be needed by 2030 – more than 10 times the current number (around 25,000)[1]. Rapid charging for longer journeys located in areas such as on motorways and in remote areas will be particularly important. At present, it is understood that the uneven spread of EV charging facilities significantly hinders the take-up of electric vehicles, due to potential servicing constraints. En-route charging for longer journeys is deemed crucial to support the switch to EV and reduce concerns about charge 'range anxiety'.

Motor Fuel Group is the UK's largest independent forecourt operator with over 900 sites offering a dual-fuel strategy, convenient retail and 'food to go'. For the abovementioned reasons, Motor Fuel Group are looking to roll-out an extensive supply of EV charging facilities at existing and new service stations across the UK to diversify their existing offer, with the aspiration to make it as easy to charge your vehicle as re-fuelling with petrol or diesel. The aspiration of Motor Fuel Group is to provide access to convenient and affordable charging, regardless of where the driver lives.

The Wick Service Station proposals relate to the provision of 6 no. electric vehicle charging points, substation enclosure and associated forecourt works.

[1] Building a comprehensive and competitive electric vehicle charging sector that works for all drivers. Final Report. July 2021

Policy Context

NPPF Paragraph 112 states that new development should e) be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.

In regard to the Green Belt, the National Planning Policy Framework (NPPF) indicates at Paragraph 150 that *"Certain other forms of development are also not inappropriate in the Green Belt provided they preserve its openness and do not conflict with the purposes of including land within it. These are:… (c) local transport infrastructure which can demonstrate a requirement for a Green Belt location;…"*

The relevant policies within the Core Strategy 2006 – 2027 (December 2013), are policies CS5 and CS8.

Policy CS5 – Location of Development – The relevant section within Policy CS5 for the proposed development is the following:

(c) other proposals for development in the Green Belt will need to comply with the provisions in the NPPF or relevant local plan policies in the Core Strategy.

Policy CS8 – Improving Accessibility – The provision and promotion of sustainable travel option will be achieved through the *"provision of facilities for charging plug-in or other ultra low emission vehicles".* Therefore, this indicates that the Council is supportive towards the development of electric vehicle chargers.

Motor Fuel Group's proposal to install new EV charging points at Wick Service Station should be considered positively in light of the national context and the demand for the necessary infrastructure to support electric vehicle use across the UK. The proposals would contribute positively to the existing EV charging network, to the benefit of those utilising the strategic highway network surrounding the application site. The proposals will enhance the existing offer at the service station, without compromising the efficient operation of the facility.

The proposed development is for the provision of electric vehicle charging facilities associated with an existing filling station in order to continue to serve motorists' refuelling needs during and after the transition from combustion engine to electric vehicles. Range anxiety is a key issue in the minds of electric vehicle drivers and there is a clear need therefore to provide recharging facilities throughout the UK, including in Green Belt locations.

The proposals will preserve the openness of the Green Belt by minimising structures to the fullest extent possible. The proposed EV chargers will be 2.2 m high, 0.4 m wide and have a depth of 0.9 m. The EV chargers will not have a canopy (unlike the previous application proposal), and this will minimise impact on the openness of the Green Belt.

The purposes of the Green Belt are set out at Paragraph 138 of the NPPF. The proposed development does not conflict with these purposes:

(a) There is no conflict with checking the unrestricted sprawl of large built-up areas as the development does not comprise urban sprawl and the site's location is remote from large built up areas;
(b) There is no conflict with preventing neighbouring towns merging into one another due to the scale and nature of the development proposed and the site's location relative to nearby towns. The closest towns are Emersons Green and Keynsham and these towns are both approximately 7 km from Wick Service Station and the site is 3.4 km from the edge of Bristol. The development is considered to be small scale and therefore there will not contribute to neighbouring towns merging into one another;
(c) The provision of electric vehicle charging facilities at an existing filling station location will assist in safeguarding the countryside from encroachment. Although the proposed development will encroach a small fraction of the green belt area, the extension of an existing service station is

better than building a wholly new EV station. As such, developing in the way proposed will reduce the pressure for development;

(d) The proposal will have no negative effect on the setting and special character of historic towns, because the development is very limited in scale, Wick is not a historic town and the site is not within a conservation area; and

(e) The proposal will not conflict with encouraging the recycling of derelict and other urban land, as there is still need for electric vehicle charging facilities within built up areas. The need for EVs exists across the UK (in urban and non-urban areas) and the existing petrol filling station is one of the best opportunities to roll out new provision of EV chargers in this locality.

Accordingly, we consider the proposal to conform with Paragraph 150 of the NPPF and to thus not comprise inappropriate development. The need to demonstrate 'Very Special Circumstances' does not, therefore, arise. As such, the requirements of Policy CS5 are also met.

Key Considerations

The original application submitted in November 2022 comprised a single line of charging bays located beneath a single 3m high canopy with three jet wash bays and associated works. In determining the previous application under reference P22/06631/F, the Case Officer and Landscape Officer made the following comments.

The Case Officer states that the original application:

"cannot be supported by the LPA. The proposed development, due to its location and scale, would cause significant harm to the visual openness and permanence of the Green Belt and therefore fails to comply with the provisions of the National Planning Policy Framework. The proposals would also have a significant visual amenity and landscape impact with the site being visible from both the A420 and London Road, the adjacent public footpath, and overlooking properties."

Further advice was given by the Case Officer, and mentioned the following:

"Any future application would need to minimise encroachment into the undeveloped areas of the site and be supported by a robust landscaping plan. It may be best to focus on just the EV charging points and forgo the canopies and jet washing bays."

The Landscape Officer concluded the following for application ref. P22/06631/F:

"The proposed layout is unacceptable in its current form as it not only necessitates the removal of the existing boundary vegetation but allows no space for a new/reinforced planting screen around the NW and NE field boundaries to help mitigate its impact on, and integrate it into, the surrounding landscape character.

The proposals will be seen in views from both the A420 and London Road, the public footpath, and overlooking properties, and will have a noticeable impact on the visual openness of the Green Belt.

For the above reasons, it is strongly recommended that the site layout is revisited with the built structures off-set from the both the NE and NW site boundaries by a min. 5m to allow for new native hedgerow planting and its maintenance".

It is considered that the above statements have been taken into account, and a re-design of the proposed scheme is now illustrated on the enclosed Proposed Site Layout Plan. The redesign reduces the number of proposed EV chargers and now comprises of 6 no. electric vehicle chargers, substation enclosure and associated forecourt works. There are no jet wash bays proposed and no canopies are proposed for the EV chargers, all of which will help maintain the openness of this location. The proposed development has moved south and east, away from the site boundaries, to minimise encroachment into the undeveloped areas of the site and maintain existing vegetation/landscaping. Moreover, the

proposed site layout plan indicates that there is scope for additional planting at the north of the field boundary to screen the development and integrate it into the surrounding landscape character.

We consider that the revised proposals address the concerns raised previously and, while we have sought informal pre-application comments prior to submission of this application, none have been forthcoming. As such, we have felt the need to make this revised application in the hope that officers can see the positive revisions which have been made.

Submission

The application comprises the following information:

- 13664-291 - BP - Block Plan - Rev A
- 13664-291 - LP - Location Plan - Rev A
- 13664-291 - P01 - Existing Site Layout
- 13664-291 - P02 - Proposed Site Layout - Rev A
- 13664-291 - P03 - EV Charger Details
- 13664-291 - P04 - Substation Elevations

Conclusions

The EV charging proposals are considered to positively respond to the local and national planning policy context, the wider UK aspiration to promptly improve the EV charging network and the comments received in respect of the previous development proposal. There are no physical environmental or designation constraints which would inhibit the occupation of the site for the proposed use.

Should you have any queries or wish to discuss please don't hesitate to contact us.

Yours faithfully,

[redacted]

Rahma Dwimunali
Assistant Planner
CarneySweeney

Encl.