



JMS PLANNING & DEVELOPMENT

PLANNING STATEMENT

PROPOSED ELECTRIC VEHICLE CHARGING  
HUB AND  
ASSOCIATED WORKS

AT

BULLIONFIELD FILLING STATION

A90

INVERGOWRIE

DUNDEE

DD2 5EG



Client: BP Pulse  
Project: Bullionfield Filling Station  
Date: October 2023

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## SECTION 1: INTRODUCTION

- 1.1. This Planning Statement also incorporating a Design and Access Statement, has been prepared by JMS Planning on behalf of BP Pulse and is submitted in support of an application for “*Proposed electric vehicle charging hub and associated works*” at Bullionfield Filling Station, A90, Invergowrie, Dundee, DD2 5EG.
- 1.2. The site comprises an established petrol filling station located in the settlement boundary of Invergowrie. The site is also allocated in the Local Development Plan 2 as an Employment Site under reference E37. While the development does not fall within that class of development, the proposed EVC hub will support the wider employment allocation and motorists on the A90.
- 1.3. It is considered that the submitted application is of significant merit as it will improve customer offer and experience on site to meet customer demand by enabling the provision of electric vehicle charging. The new facility will assist in reducing the reliance on oil based fossil fuels for road transport in accordance with Development Plan policy and national aspirations, as well as providing sustainable development on an existing, established service station in an appropriate location.
- 1.4. This Statement continues in Section 2 by providing a summary of the Applicant, Section 3 provides the site’s location and its context, with a brief summary of the planning history for the site in Section 4. Details of the application proposal are set out in Section 5. A detailed description of the electric vehicle charging facility and associated benefits is contained within Section 6, with a detailed summary of the planning policy position at National and local level contained within Section 7. Section 8 sets out the justification for the proposal in the context of national requirements, local need and the policy position. Conclusions on all matters are drawn in Section 9.
- 1.5. Also submitted with the application is the SUDs strategy prepared by Mark Heeley LTD.



## SECTION 2: BP PULSE

- 2.1 BP Pulse is BP's electric vehicle (EV) charging business. It is one of the leading rapid and ultra-fast public EV charging networks in the UK and operates the largest number of sites with ultra-fast charging in Germany.
- 2.2 BP's EV charging journey started in 2018 with the acquisition of Chargemaster Ltd in the UK. Rebranded to BP pulse, its presence has extended rapidly across the world to China, Germany, Netherlands, and USA.
- 2.3 Focused on fast, reliable charging bp pulse is rolling out charge points to consumers and commercial fleets wherever they need them; home, destination, depot and on-the-go, as well as at BP forecourts. BP Pulse are one of the largest charge point operators in the UK. BP Pulse is delivering the right charging speeds, in the right locations and focussing on ultra-fast and rapid charge points to provide a comprehensive EV charging network across the country and it plans to roll out hundreds of hubs by 2030 in urban areas, on trunk roads and motorways.
- 2.4 EV charging is one of the key growth engines driving BP's transformation to an integrated energy company. The company aims to grow its network of public EV charging points by 2030 to over 100,000 worldwide.

### Market Context

- 2.5 Battery electric vehicles accounted for 6.6% of all new car registrations in the UK in 2020, up from 1.6% in 2019. To meet Government targets, 100% of new registrations must be battery electric by 2035.
- 2.6 To achieve full electrification, significant private and public infrastructure investment will be required.

### En Route Charging

- 2.7 EV motorists can charge in multiple different settings – at home, on-street, at work, in car parks or on route. Each of these charging segments will be critical to EV adoption and will give drivers confidence that they can get to and from their destination, alleviating drivers' concerns over range anxiety, which are well documented.
- 2.8 On route charging will be particularly important infrastructure for those drivers who do not have access to 'at home' charging. In the UK, over 60% of dwellings in cities and urban areas do not have garages or other off-road parking provisions, and so must rely on electricity from publicly accessible networks.



## SECTION 3: SITE AND SURROUNDING AREA

- 3.1 The application site comprises a BP petrol filling station which is situated on the southbound side of the A90. The A90 is a major north to south road in eastern Scotland, running from Edinburgh to Fraserburgh, through Dundee and Aberdeen. This section of the A90 connects Perth with Dundee.
- 3.2 The site is located within the settlement boundary of Invergowrie. Despite being within the settlement boundary, the application site is isolated from built development, and is surrounded by agricultural land. The site is located approximately 450m west of Invergowrie, and is also approximately 430m north of the James Hutton Research Institute. It is therefore an important refuelling facility for motorists, especially motorists working at the Research Institute.
- 3.3 The petrol filling station comprises a central forecourt with a five pump islands arranged in a starter gate format with canopy above providing refuelling for 10 vehicles with 2 additional HGV pumps. The HGV pumps are located under a separate canopy. The sales building is to the west of the forecourt which comprises an 'M&S' retail outlet. The sales building has a flat roof.
- 3.4 There are 14 customer car parking spaces across the site including an accessible bay. There is also an air and water bay.
- 3.5 There is a decommissioned LPG tank farm along the eastern boundary of the site. This area has been covered by hardstanding, and has been fenced off.
- 3.6 The application site is not located within a conservation area neither are there any TPOs on site.



## SECTION 4: PLANNING HISTORY

- 4.1 A review of planning history of the application site has been undertaken using the Perth and Kinross Council's website online search.

Application Number	Description of Proposal	Date of Decision
99/01293/FUL	Installation of below ground LPG tank and enclosure fence, form tanker stance and alter existing kerbs	Approved 15 <sup>th</sup> October 1999
97/00756/FUL	Extension of shop, additional pump island, extension to canopy and additional service/valet area	Approved 11 <sup>th</sup> July 1997
96/01203/FUL	Erect 1.2m satellite dish	Approved 18 <sup>th</sup> September 1996

- 4.2 The application site is therefore an established petrol filling station and this has been confirmed by the planning history of the site which demonstrates its use as a petrol station dating back some 27 years ago. Since this time there have been a number of applications to allow the site to adapt to meet motorists' needs.



## SECTION 5: PLANNING PROPOSAL

- 5.1 The application seeks full planning permission for a “*Proposed electric vehicle charging hub and associated works*” at Bullionfield Filling Station, A90, Invergowrie, Dundee, DD2 5EG.
- 5.2 The proposal seeks to provide four EV Charging bays, to be located along the eastern boundary of the site. The EV bays will be located on existing hardstanding where an LPG tank farm was previously located. The LPG tank farm has been decommissioned, and hardstanding has been put over the area where the LPG tank farm was previously located. The area is currently fenced off.
- 5.3 The proposed LV cabinet and substation will also be located next to the EVC bays.
- 5.4 There are no proposed alterations to the existing access and egress arrangements.
- 5.5 The proposal will not result in the loss of any parking across the site.

### **Role, Function and Location of Service Stations**

- 5.6 Prior to the consideration of this application, it is relevant to consider the context in which the application is submitted, both in terms of current trends within the petroleum industry and the specific reference to the role, function and location of service stations generally, as well as the specific role and function of the application site.
- 5.7 The Experian Catalist UK database released in 2023, confirms that the number of petrol forecourts in the UK had fallen to just 8,365, compared to the 1967’s all-time high of 39,958 forecourts. This is representative of a downward trend of service station sites in the UK.
- 5.8 Conversely, the number of registered UK vehicles once again broke records, rising from 33.98 million in the first quarter of 2009 to reach 40.4 million at the end of March 2022, with each forecourt supplying an average of 4,830 vehicles.
- 5.9 The effect of the above is that fewer service stations are serving more motorists. As a result, those individual service stations which remain and any new facilities are becoming increasingly busier, experiencing a greater volume of visitation rates and a greater throughput of fuel and are, thus, being made to work much more intensively. It is self-evident that the role and function of service stations are geared towards serving the motorist.





Depending upon the location of service stations, such developments have the potential to intersect traffic from a wide catchment area.

- 5.10 Service stations generally offer a range of services. These include the provision of fuels, EVC, car care facilities (such as air/water and car washing) and shops.



## SECTION 6: BACKGROUND TO ELECTRIC VEHICLE RECHARGING

- 6.1 Powering more of the cars we drive with electricity is essential to addressing growing CO<sub>2</sub> emissions and air pollution in cities. As more electric car models become available, they will also become more affordable choice for people and businesses.
- 6.2 There are around one billion cars on the world's roads. Of these around two to three million are pure battery electric and plug-in hybrid electric vehicles, according to the International Energy Agency (IEA). The IEA anticipates there may be three hundred to four hundred million electric vehicles (EVs) on the road out of approximately two billion vehicles by 2040.
- 6.3 Electric vehicles are cars and other forms of mobility that use an electric motor as their main source of propulsion, rather than a conventional engine. They also have their energy stored in batteries.
- 6.4 There are three main types of electric vehicles; battery electric vehicles, hybrid electric vehicles and plug-in hybrid electric vehicles.
- 6.5 Battery electric vehicles are all electric cars that rely on their batteries as the only source of energy. Hybrid and plug-in hybrid electric vehicles combine electric drive with a conventional fuel engine.
- 6.6 Unlike traditional cars, which usually refuel at petrol stations, electric cars have the potential to be recharged at home, at work or on the go. They can also be charged in shared locations such as forecourts, car parks or supermarkets. Speed, availability and the reliability of charging infrastructure are currently the biggest potential deterrents to buying an electric car. BP Pulse believes this could be changed with better access to recharging options, better suited to the needs of customers and their lifestyles. This could include smart, regular chargers, ideal for those charging overnight at their homes or during working hours. It could also include high powered, fast chargers designed for when drivers are between destinations and in need of a quick top-up.

### **Taking Charge: The Electric Vehicle Infrastructure Strategy (March 2022)**

- 6.7 The Taking Charge: The Electric Vehicle Infrastructure Strategy published in March 2022 and sets out the Government's vision and strategy to enable and accelerate the adoption of electric vehicles (EVs) in the UK.
- 6.8 The Prime Minister's announcement in November 2020 that sales of all new petrol and diesel cars and vans would end in 2030, put the UK on course to



be the fastest nation in the G7 to decarbonise road transport. Since then, the report confirms that in 2021, 190,000 battery powered electric vehicles were sold in the UK. This was more than the five previous years combined, and nearly 1 in 8 of all new cars sold. Notwithstanding the uptake in use of battery electric vehicles, the focus on vehicles is only one part of the overall approach to transition into net zero road transport with a second priority being the provision of adequate charging infrastructure.

- 6.9 In response to the above, the government's vision is to remove charging infrastructure as both a perceived, and a real barrier to the adoption of electric vehicles and have as a minimum 300,000 public charge points by 2030 – equivalent to almost 5 times the number of fuel pumps on our roads today.
- 6.10 To deliver this vision and eliminate '*road anxiety*' the Government will focus on the roll out of high-powered chargers on the strategic road network and local on-street parking. The strategy focuses on the delivery of:
- Sufficient charge points ahead of demand to ensure that everyone can find and access reliable public charge points wherever they are;
  - Effortless on and off-street charging for private and commercial drivers;
  - Fairly priced and inclusively designed public charging;
  - Market-led rollout for the majority of charge points;
  - Seamlessly integrated infrastructure into a smart energy system; and
  - Continued innovation to meet driver's needs.
- 6.11 One of the key drivers is to step up the delivery of high-powered chargers on the strategic road network for people making longer journeys. To achieve this, the government has allocated £950 million on a Rapid Charging Fund to support the rollout of at least 6,000 high powered 9 charge points across the UK's motorways and major A-roads by 2035. In particular, the government highlights the role that service area operators and large fuel retailers have in the delivery of this vision stating, 'We will ensure that every motorway service area has at least six rapid chargers by the end of 2023, with some having more than 12.'
- 6.12 Moreover, the strategy confirms that government will help to reduce the costs to private sector rollout and businesses by tackling barriers to investment and delivery of public charge points, to speed up private sector delivery of much needed EV charging infrastructure.



- 6.13 One of the key challenges identified in the strategy is the slow pace in which charge point installers can roll out the required infrastructure due to the need of multiple permission, consents and licenses; the lack of plentiful, reliable and fairly priced public charging network, amongst others. Notably, the strategy stresses that there needs to be more local engagement, leadership and planning.
- 6.14 The report concludes that if the UK economy is to achieve net zero emissions by 2050, it has to decarbonise road transport. The recent rapid increase in both the supply of, and the demand for, EVs means that charging infrastructure now stands as the single biggest challenge to that decarbonisation.

### **Energy White Paper (December 2020)**

- 6.15 On 14 December 2020 the Government published its Energy White Paper which expands on Prime Minister Boris Johnson's announced ten-point plan for a green industrial revolution and sets out the steps needed to cut emissions from industry, transport and buildings by 230 million metric tonnes as part of the journey to net zero emissions by 2050.
- 6.16 The document sets out how the UK will increase deployment of green energy sources in order to meet the 2050 net zero carbon target. The White Paper confirms the Government will support the roll out of charging and associated grid infrastructure along the strategic road network to support drivers to make the switch to electric vehicles (EV's) ahead of the phase out of the new petrol and diesel cars and vans by 2030 and hybrids with significant zero emission capability by 2035. It is confirmed that the UK will end the sale of new petrol and diesel cars and vans by 2030, ten years earlier than planned. The sale of hybrid cars and vans that can drive a significant distance with no carbon emissions will continue until 2035. The Energy White Paper notes that this accelerated transition requires scaling – up the roll out of EV charge points and, in turn, an associated expansion of electricity generation and network capacity to meet the increase in demand for power.
- 6.17 With the necessary investment in new infrastructure and adoption of smart charging the Government is confident the system will cope with the transition. As part of a £2.8bn package announced in the Prime Minister's ten point plan the Government intends to provide funding of £1.3bn to accelerate the roll out of charge points for EV's in homes, workplaces, streets and on motorways across the UK, so people can more easily and conveniently charge their cars. The Government will invest £950m of this funding in future proofing grid capacity along with the strategic road network to prepare ahead of need for a one hundred percent take up of zero emission cars and vans.



- 6.18 There is therefore acknowledgement at the highest level of Government of the importance of a comprehensive EV network.

**State of Switch Report Produced by New Automotive (October 2021)**

- 6.19 New Automotive is a new independent transport research organisation founded in 2020 with a mission to support the switch to electric vehicles. Based on their research published in October 2021 they estimate that the UK will need 230,000-280,000 public charge points by 2035. However, at the current time, there are 24,000 public charging stations including over 4,000 rapid chargers in the UK.
- 6.20 The report concludes whilst there has been a huge uptake in EV sales over the past 12 months, they believe the targets are only achievable if policy makers commit to the 'electrification' of UK roads and install the necessary infrastructure. They are currently concerned that the most recent trends indicate the popularity of hybrids which may be one of the key issues to overcome in the transition to a complete shift to electric vehicles.
- 6.21 Another key issue is the provision of charging points which will become increasingly important as the ownership of EVs spreads across the wider population. They hope the report published this month becomes an annual publication tracking the delivery and support for electric vehicles over time.



## SECTION 7: PLANNING POLICY FRAMEWORK

- 7.1 This Section of the supporting Statement sets out national and local planning policy framework relevant to the proposed planning application.

### National Planning Guidance

#### Scottish National Planning Framework 4 (NPF4)

- 7.2 Scotland's fourth National Planning Framework (NPF4) is a long term plan looking to 2045 that guides spatial development, sets out national planning policies, designates national developments and highlights regional spatial priorities. It is part of the development plan, and so influences planning decisions across Scotland.
- 7.3 NPF4 was adopted by the Scottish Ministers on 13 February 2023, following approval by the Scottish Parliament in January.
- 7.4 Policy 1 (Tackling the climate and nature crises) seeks to encourage, promote and facilitate development that addresses the global climate emergency and nature crisis. It suggests that when considering all development proposals significant weight will be given to the global climate and nature crises.
- 7.5 Policy 2 (Climate mitigation and adaptation) aims to encourage, promote and facilitate development that minimises emissions and adapts to the current and future impacts of climate change. The Policy states that development proposals to retrofit measures to existing developments that reduce emissions or support adaptation to climate change will be supported.
- 7.6 Policy 11 (Energy) states development proposals for all forms of renewable, low-carbon and zero emissions technologies will be supported.
- 7.7 Policy 13 (Sustainable transport) sets out the Council's desire to encourage, promote and facilitate developments that prioritise walking, wheeling, cycling and public transport for everyday travel and reduce the need to travel unsustainably. The Policy is of significant relevance to this application, stating that proposals to improve, enhance or provide active travel infrastructure, public transport infrastructure or multi-modal hubs will be supported. This includes proposals for electric vehicle charging infrastructure and electric vehicle forecourts, especially where fuelled by renewable energy.
- 7.8 Policy 14 (design, quality and place) states development proposals will be designed to improve the quality of an area whether in urban or rural locations and regardless of scale. Development proposals will be



supported where they are consistent with the six qualities of successful places: Healthy, Pleasant, Connected, Distinctive, Sustainable and Adaptable.

### **The Development Plan**

- 7.9 To the extent the Development Plan policies are material to an application for planning permission, a decision must be taken in accordance with the Development Plan unless there are material considerations that indicate otherwise (Section 70(2) of the Town and Country Planning Act 1990 and Section 38(6) of the Planning and Compulsory Purchase Act 2004).
- 7.10 The Development Plan for the area comprises the TAYplan Strategic Development Plan 2016-2036 and the Perth and Kinross Local Development Plan 2 (2019).

### **TAYplan Strategic Development Plan 2016 – 2036 – Approved October 2017**

- 7.11 Whilst there are no specific policies or strategies directly relevant to this proposal the overall vision of the TAYplan should be noted. The vision states *“By 2036 the TAYplan area will be sustainable, more attractive, competitive and vibrant without creating an unacceptable burden on our planet. The quality of life will make it a place of first choice where more people choose to live, work, study and visit, and where businesses choose to invest and create jobs.”*

### **Perth and Kinross Local Development Plan 2 – Adopted November 2019**

- 7.12 The Local Development Plan 2 (LDP2) is the most recent statement of Council.
- 7.13 Policy 1A (Placemaking) states development must contribute positively to the quality of the surrounding built and natural environment. All development should be planned and designed with reference to climate change, mitigation and adaptation.
- 7.14 Policy 1B (Placemaking) states all proposals should meet all the following placemaking criteria:
- (a) Create a sense of identity by developing a coherent structure of streets, spaces, and buildings, safely accessible from its surroundings.
  - (b) Consider and respect site topography and any surrounding important landmarks, views or skylines, as well as the wider landscape character of the area.
  - (c) The design and density should complement its surroundings in terms of appearance, height, scale, massing, materials, finishes and colours.



(d) Respect an existing building line where appropriate, or establish one where none exists. Access, uses, and orientation of principal elevations should reinforce the street or open space.

(e) All buildings, streets, and spaces (including green spaces) should create safe, accessible, inclusive places for people, which are easily navigable, particularly on foot, bicycle and public transport.

(f) Buildings and spaces should be designed with future adaptability, climate change and resource efficiency in mind wherever possible.

(g) Existing buildings, structures and natural features that contribute to the local townscape should be retained and sensitively integrated into proposals.

(h) Incorporate green infrastructure into new developments to promote active travel and make connections where possible to blue and green networks.

(i) Provision of satisfactory arrangements for the storage and collection of refuse and recyclable materials (with consideration of communal facilities for major developments).

(j) Sustainable design and construction.

- 7.15 Policy 6 (Settlement Boundaries) states for those settlements which have a boundary defined in the Plan, built development will be contained within that boundary.
- 7.16 Policy 33A (Renewable and Low Carbon Energy: New Proposals for Renewable and Low-Carbon Energy) states proposals for the utilisation, distribution and development of renewable and low-carbon sources of energy will be supported
- 7.17 Policy 35 (Electricity Transmission Infrastructure) states that proposals for electricity transmission infrastructure (including lines, towers/pylons/poles, substations, transformers, switches and other plant) will be supported.
- 7.18 Policy 60B (Transport Standards and Accessibility Requirements: New Development Proposals) supports the provision of infrastructure necessary to support positive changes in Low and Ultra Low Emission Vehicle transport technologies, such as charging points for electric vehicles, hydrogen refuelling facilities and car clubs, including for residential development.





## SECTION 8: PLANNING ISSUES

8.1 This Section of the Planning Statement sets out the general planning matters which require consideration in the determination of this application. Accordingly, the following general planning matters are considered below:

- The principle of development on the site;
- Sustainability credentials of the scheme;
- Design and Access matters;
- Traffic generation and highways;
- Residential amenity;
- Air quality; and
- Flooding.

### Principle of Development

- 8.2 The site is allocated in the Local Development Plan 2 as an Employment Site under reference E37. While the development does not fall within that class of development it will provide a complimentary/ancillary use to the existing BP filling station, as well as serving motorists within the employment site as well as motorists travelling on the A90. The proposal is also in accordance with Policy 6OB (Transport Standards and Accessibility Requirements: New Development Proposals) which supports the provision of infrastructure necessary to support positive changes in Low and Ultra Low Emission Vehicle transport technologies, such as charging points for electric vehicles, hydrogen refuelling facilities and car clubs, including for residential development. Consequently the installation of this infrastructure in this location is considered to be acceptable.
- 8.3 The central imperative of the development, at this site and others nationwide, is part of the inevitable and essential move away from hydrocarbons into a world where net zero carbon transport is the norm. Such initiatives are strongly supported by the recently adopted NPF4. In this context, the development should be embraced by the local authority, as part of the overall move to a zero carbon and emission transport future.
- 8.4 The site is an established petrol filling station, and the upgrade to the site comprises the provision of an electric vehicle hub which forms part of a nationwide initiative to reduce carbon dioxide emissions which is supported at both national and local level. The principles of sustainable development and the support for more renewable technologies in the borough are clear. The proposed development is therefore in accordance with Policy 1A (Placemaking) which states development must contribute positively to the quality of the surrounding built and natural environment. All development should be planned and designed with reference to climate change, mitigation and adaptation.



- 8.5 The site is located in a sustainable location for providing electric vehicle charging points as part of the wider highway network, meeting the needs of motorists. The proposal also accords with NPF4 policy which supports the re-use of developed land. The proposal seeks to utilise this land more efficiently for the purposes of sustainable development, by providing the relevant infrastructure for low carbon transport modes and for evolving motorists' needs.
- 8.6 Overall, the proposal will bring significant enhancement to an existing petrol filling station, ideally positioned to serve both the motorist as well as local workers.

### **Sustainable Development Credentials**

- 8.7 The fundamental principle upon which the NPF4 is based on sustainable development. The document confirms that plans should protect and exploit opportunities for the use of sustainable transport modes for the movement of goods or people. Specifically the NPF4 Policy 13 states that development to improve travel infrastructure, including electric vehicle charging infrastructure and electric vehicle forecourts, will be supported.
- 8.8 The NPF4, Policy 2 c) also confirms that development proposals to retrofit measures to existing developments that reduce emissions or support adaptation to climate change will be supported. Accordingly, there is clear support from national policy for the use of non-fossil fuels and those with a low or zero carbon generation.
- 8.9 Policy 33A of the Local Development Plan 2 relates to new proposals for renewable and low carbon energy and policy 35 relates to electricity transmission infrastructure. These policy seek to support the utilisation, distribution and development of renewable and low carbon sources of energy. This proposal to introduce
- 8.10 As expanded upon in Section 6 of this Statement, electric vehicles can significantly reduce CO<sub>2</sub> emissions from the transport sector, especially if electricity is generated from renewable technologies. The benefits of electric vehicles are expanded upon elsewhere in the report, but they have the benefit of improving local air quality and providing significant health benefits, helping to address air pollution, whilst offering a comfortable, quiet ride for motorists.
- 8.11 Whilst the number of electric vehicles within the UK is relatively few at the current time, and a lack (or perceived lack) of infrastructure is seen as a



major constraint, there are significant environmental benefits to electric vehicles in environmental terms.

- 8.12 Sustainable development objectives, as set out within the NPF4, are also cross-referenced at the local level and therefore it is considered that proposal compliance with the aims of sustainable development policies, whereby electric vehicles and associated infrastructure are specifically supported. This is therefore a material consideration weighing heavily in favour of the development.

### **Traffic Generation and Highways**

- 8.13 The proposal, in terms of the principle of use, is supported at all levels from a transport perspective with the introduction of low carbon vehicles meeting the objectives of climate change at a national and local level.
- 8.14 The addition of electric vehicle charging to the site is not considered to raise any issues as the existing operation of the site will remain broadly unchanged. The visitation rates to the site are expected to be broadly unchanged as site users will switch from petrol/diesel refuelling to EVC as the type of car ownership changes over time.
- 8.15 No changes are proposed to the public highway or access onto it, nor will there be any changes to existing numbers of customer car parking.

### **Design and Access Matters**

- 8.16 There are a number of key issues which have informed the design solution for the site's development. Effectively, it balances the site's opportunities and constraints arising from the assessment of the site to deliver a development that achieves a high-quality design, is sustainable, is economically viable and enhances the established locality.

### Use

- 8.17 The site is an existing operational petrol filling station. The proposed development is for a new EV charging facility with associated alterations, supplementing the existing forecourt and sales building.
- 8.18 The existing petrol filling station is a sui generis use, and the petrol filling station is a long-established use on site. Accordingly, the principle of the proposal is acceptable in planning policy terms considering the wider established use and the context of the site.



### Layout

- 8.19 The proposed layout of the scheme is shown on the accompanying planning application drawings. The layout will remain broadly as existing, with the addition of a new EV hub to the east of the site.
- 8.20 The layout of the scheme has been carefully assessed taking into consideration the site boundaries, the need for the site to be accessible by domestic vehicles, HGVs and service/delivery vehicles and to create an attractive and practical environment. The proposed is considered to accord with policies in the Development Plan.

### Scale

- 8.21 The EVC hub is of an appropriate scale and complementary to the existing use on the site. The proposal is therefore appropriate to its location and accords with design policies.

### Appearance

- 8.22 The design of the EVC hub is practical and designed to meet the needs of the users whilst also respecting the character of the site (a petrol filling station) and wider area. It is considered to accord with the NPPF and development plan.

### Materials

- 8.23 The proposed materials are shown on the submitted drawings and are functional, meeting the requirements of a petrol filling station.

### Community Safety

- 8.24 Consideration has been given to creating an attractive safe environment through the development of a high quality public realm with a parking area which is overlooked by the proposed sales building. The proposed site arrangement ensures natural surveillance across the whole site and protects the safety of users of the site and wider community.

### Landscaping

- 8.25 The site is an existing commercial site within the settlement boundary of Invergowrie. The proposed development will result in the loss of a very small area of grassland along the eastern boundary of the site but there is



an opportunity to reinstate some hardstanding back to grassland in this location to compensate. Given the character of the area it is not considered the change in landscaping will have any adverse effect on the amenity of the wider area.

#### Accessibility

- 8.26 The applicant is committed to a policy of equality, inclusion and accessibility for those who live and visit the site and has strived to exceed all required standards and achieve a development which promotes inclusion and accessibility.
- 8.27 The provision of an accessible and inclusive environment has been an integral theme throughout the design process, from its initial conception to its current form. The concept of inclusive design seeks to remove barriers which create undue effort, separation or special treatment which enables everyone to participate equally regardless of gender, disability or age.

#### Inclusive Access

- 8.28 In respect to inclusive access, all of the major petrol filling station operators agree that it is not merely physical barriers that can cause difficulties for customers. Employees of all the major national chains will receive Disability Awareness Sessions as part of their basic training, to understand the challenges customers with disabilities may face, and to ensure that their needs are met.

#### Servicing

- 8.29 In respect to servicing, the application does not propose any change to the servicing arrangements for the site. This issue has been considered acceptable in the consideration of the extant permission on site.

#### Conclusion

- 8.30 The proposal responds positively to the site's opportunities and constraints, and consideration has been given to layout, scale, appearance and landscaping. Access to and within the site has been carefully reviewed. It is considered that, based on the above, an appropriate and site sensitive design solution has been found, which accords with planning
- 8.31 The proposed development provides the opportunity to modernise the sales building. The proposed development is therefore in keeping with local design policy. The design of the proposed development is of high quality...



- 8.32 On this basis, it is considered that the scheme should be acceptable in respect of the issue of design.

### **Residential Amenity**

- 8.33 Despite being within the settlement boundary of Invergowrie, the site, and proposed development is not close to any residential properties, and as such there are no matters arising relative to neighbour amenity.

### **Air Quality**

- 8.34 There are significant environmental benefits, particularly to air quality, arising from the proposal. Whilst the impact of electric vehicles will not be immediate, the long term goal, with increased electric vehicle uptake, will result in decreased carbon dioxide emissions and improvements to local and national air quality. Accordingly, the proposed development seeks to mitigate pollutants and other environmental impacts on health.
- 8.35 The long-term benefits of the proposal in terms of air quality are positive, which accords with the relevant local plan policy.

### **Flooding**

- 8.36 The site is not considered to be at risk of fluvial flooding. The site however is located in an area at high risk from surface water flooding. As a result, a SUDs strategy has been submitted with the application, prepared by Mark Heeley LTD.
- 8.37 The SUDs report outlines that there would be a small increase in hardstanding as a result of the proposed development. The drainage scheme has been based upon disposal of surface water runoff via the existing surface water connections on site, ensuring that no increase of flood risk will result from the proposed redevelopment.
- 8.38 The proposed attenuation storage is to accommodate run-off from a 1:100-year rainfall event plus a 35% additional allowance for climate change, in accordance with SEPA guidelines. The proposed drainage network incorporates storm water pollution prevention measures such as, SDS Aqua-Swirl, and a Class I petrol interceptor. It is therefore considered that the proposed development is acceptable from a surface water flooding and SUDs point of view.



## SECTION 9: CONCLUSIONS AND PLANNING BALANCE

- 9.1 This Planning Statement also incorporating a Design and Access Statement, has been prepared by JMS Planning on behalf of BP Pulse and is submitted in support of an application for the “*Provision of an electric vehicle charging hub and associated works*” at Bullionfield Filling Station, A90, Invergowrie, Dundee, DD2 5EG.
- 9.2 The NPF4 identifies the need for planning positively for sustainable development and embracing the opportunity to support solutions which offer reductions in greenhouse gas emissions, and mitigate the effects of climate change. This is further reiterated in Development Plan which actively encourages infrastructure to support electric vehicles and recharging facilities for low emission vehicles and alternative fuel technologies.
- 9.3 The proposal represents a modernisation of the existing facilities on the site to meet changing motorists’ and environmental needs. Whilst the site continues to be in a functional use, it offers significant environmental benefits and meets modern standards.
- 9.4 The proposal has been considered against relevant planning policy and it is considered to be in accordance with the Development Plan. Material considerations, in the form of the NPF4 and general climate change policy weigh heavily in favour of the development, supporting the installation of technology for low carbon alternative fuel technologies. As such, in weighing up the ‘*planning balance*’ it is considered the proposed application is of significant merit and should be supported.
- 9.5 Overall, it is considered that the application proposal is of significant benefit to the Council and its aspirations in respect to air quality and accordingly, it is respectfully requested that planning permission be granted.