



# **Planning Statement**

## **Blackpool Village Hotel**

**Prepared on behalf of IONITY**

January 2024

---

Blackpool Village Hotel

---

Document Control:

Project	Blackpool Village Hotel
Client	IONITY
Job Number	223596

Issue	Date	Status	Author	Reviewed	Approved
1	11.01.24	Final draft	LK	VW	

## Contents

<b>1.</b>	<b>Introduction .....</b>	<b>5</b>
<b>2.</b>	<b>Site Context and Planning History .....</b>	<b>7</b>
<b>3.</b>	<b>Planning Policy Context .....</b>	<b>8</b>
<b>4.</b>	<b>Proposed Development .....</b>	<b>14</b>
<b>5.</b>	<b>The Case for Planning Permission.....</b>	<b>15</b>
<b>6.</b>	<b>Summary and Conclusions .....</b>	<b>17</b>

## **Executive Summary**

This application has been submitted to support the development of 12 new EV charging bays and associated infrastructure within the car park of the Blackpool Village Hotel, which is located in the administrative boundary of Blackpool Council.

The delivery of long-term, accessible, and sustainable means of transport is essential in supporting the Governments sustainability and zero carbon goals. This proposed development will help facilitate and provide much needed services to electric vehicle users. It has been well documented that there is a lack of public electric vehicle infrastructure in accessible locations, as highlighted in the statement below.

The development proposals will deliver a number of important benefits and help achieve the Governments zero carbon objectives. These benefits include:

- Supports the transition to highly sustainable modes of transport
- Supports the sustainability objectives of a local employer
- Is located on previously developed land
- Will not cause any adverse impacts on the transport network

## 1. Introduction

- 1.1. This application for full planning permission is made on behalf of our client IONITY, in support of a planning application for the erection of an Electrical Vehicle (EV hereafter) charging hub at Blackpool Village Hotel, East Park Drive, Blackpool FY3 8LL.
- 1.2. IONITY is a joint venture of the car manufacturers BMW Group, Ford Motor Company, Hyundai Motor Group, Mercedes Benz AG and Volkswagen Group with Audi and Porsche, along with BlackRock's Global Renewable Power platform as financial investor. They are building, operating, and constantly growing their network of high-power charging stations along highways in 24 European countries. All charging stations are open to electric vehicles of any brand. With multiple charging points at each location. With ultra-fast charging stations that recharge a vehicle's batteries for the next stretch of the vehicle's journey in the shortest time possible. Importantly, IONITY provide 100% renewable energy everywhere in their network, delivering on ambitions for carbon-neutral driving.
- 1.3. IONITY and the Village Hotel Club have partnered to deliver electric vehicle charging at all 33 Village Hotel locations in the UK. Village Hotel Club offers more than a traditional hotel. Alongside the hotel, they provide top of the range Health & Wellness Club with state-of-the-art kit, swimming pool and award-winning classes at every location. As well as bar and restaurants, meeting and event rooms, VWorks co-working space and Starbucks coffee shops. All these facilities are available for guests, members and the local community to enjoy.
- 1.4. Village Hotel Club have launched the Village Green initiative – their aim is to have a positive impact on the communities we operate in, both environmentally and socially. The provision of EV charging infrastructure sits alongside a raft of measures including:
  - Target to be Carbon Neutral by 2050
  - By the end of 2023, our hotels will have 100% renewable electricity backed by Renewable Energy Guarantees of Origin (REGO) certificates.
  - Sustainability practices have been recognised with a Bronze Award Green Tourism Award, across all 33 UK hotels.
- 1.5. The application seeks permission for the installation 12 EV charging bays, covered by a canopy which will house solar panels used to support powering the charging points to form an 'Electric Hub', and the associated infrastructure necessary to support the development.
- 1.6. The development description for the purposes of this planning application is:

“The development of an Electric Vehicle charging hub and associated works”
- 1.7. This Statement should be read alongside the following:

- Application form;
- Location Plan;
- Existing Site Plan;
- Proposed Site Plan;
- EV Bays and Equipment Area Plan;
- Existing Elevations;
- Proposed Elevations;
- Typical Planning Details;
- Product Data Sheets – HYC50 Foundation
- Product Data Sheet – HYC400
- LV Panel Foundation details
- Substation Plans
- Power Cabinet and Charger Manual

1.8. Our Statement is presented as follows:

- **Chapter 2** sets out the site context and planning history;
- **Chapter 3** considers the planning policy context;
- **Chapter 4** outlines the proposed development;
- **Chapter 5** sets out the case for planning permission; and
- **Chapter 6** provides the summary and conclusions.

## 2. Site Context and Planning History

2.1 This Section describes the Site and the surrounding area in terms of land use and key characteristics in order to set the planning context.

### The Site and Surrounding Area

2.2 The site area for the proposed development extends to 0.126 acres.

2.3 Village Hotel Blackpool is located between Stanley Park and Blackpool Zoo. Please refer to the accompanying Site Location Plan.

2.4 The hotel site has a number of buildings providing the facilities for guests. This includes restaurants, hotel rooms, gym, and meeting spaces. Surrounding the buildings is extensive car parking. Currently, the car park includes no provision for EV charging.

2.5 The golf course can be found to the immediate west of the site.

2.6 A band of trees runs along the northern, southern and western borders of the wider site.

2.7 Access to the site is off East Park Drive (A587) via a private road.

### Planning History

2.8 The recent Planning History for the Village Hotel Site is set out at Table 1.

Application Reference	Description of Development	Decision
21/0330	Erection of a 20m lattice tower and associated cabinets and equipment.	Prior Approval Required and Granted
11/0083	Display of two internally illuminated 4.5 metres high free-standing totem signs to East Park Drive entrance.	Grant Permission
10/1377	Construction of outdoor pool with associated external plant room enclosure.	Grant Permission
08/0434	Erection of extension to current hotel office space and use as altered as a golf shop.	Grant Permission
08/0187	Erection of single storey extension to golf driving range to form golf shop and modifications to existing driving range.	Grant Permission
05/1154	Erection of part two, part three storey extension over laundry/service yard to form plantroom, an additional 22 bedrooms and an enclosed staircase.	Grant Permission

**Table 1: Planning History**

### 3. Planning Policy Context

- 3.1 Any proposal should be determined in accordance with national and local planning policies and guidance, as set out below.

#### **National Planning Policy**

- 3.2 The national policy context for the Site comprises two documents, the National Planning Policy Framework (December 2023), and the National Planning Practice Guidance (Live Document). Alongside these national planning policy documents, there is also the General Permitted Development Order 2015 (“GPDO”) which operates to deem the grant of planning permission for certain development without needing to apply for formal planning permission. Schedule 2 of the GPDO 2015 refers to this as “permitted development”.

#### **National Planning Policy Framework (NPPF) (December 2023)**

- 3.3 The NPPF sets out the Government’s planning policies for England and how these should be applied. It must be taken into account in preparing the development plan and is a material consideration in planning decisions. Planning policies and decisions must also reflect relevant international obligations and statutory requirements.
- 3.4 Paragraph 7 of the NPPF confirms that *“the purpose of the planning system is to contribute to the achievement of sustainable development including the provision of homes, commercial development, and supporting infrastructure in a sustainable manner. At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs”*
- 3.5 Paragraph 8 goes to outline that *“achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):*
- a) *an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;*
  - b) *a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being; and*
  - c) *an environmental objective – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using*



*natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.”*

- 3.6 Paragraph 85 concerns building a strong, complete economy and states: *“Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future. This is particularly important where Britain can be a global leader in driving innovation, and in areas with high levels of productivity, which should be able to capitalise on their performance and potential.”*
- 3.7 Section 9 of the NPPF concerns promoting sustainable transport. Paragraph 114 confirms that *“in assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that: a) appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location.”*
- 3.8 Paragraph 116 states that *“applications for development should: (e) be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.”*
- 3.9 Section 14 of the NPPF considers the objective of meeting the challenge of climate change, flooding and coastal change. Paragraph 157 states that *“the planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.”* (emphasis added by author)

#### **Permitted Development Rights**

- 3.10 The Town and Country Planning (General Permitted development) (Amendment) (England) Order 2015 has introduced permitted development rights for electric vehicle charging points in off-street public and private car parking areas.
- 3.11 In the context of EV chargers, the GPDO 2015 deals with two different scenarios – (1) wall mounted outlets and (2) outlets on an upstand.
- 3.12 In relation to wall mounted EV charging outlets, the GPDO (Part 2, Class D) states:
- “D. The installation, alteration or replacement, within an area lawfully used for off-street parking, of an electrical outlet mounted on a wall for recharging electric vehicles.*

*Development not permitted:*

*D.1 Development is not permitted by Class D if the outlet and its casing would—*

- a) exceed 0.2 cubic metres;*
- b) face onto and be within 2 metres of a highway;*
- c) be within a site designated as a scheduled monument; or*
- d) be within the curtilage of a listed building.*

*Conditions:*

*D.2 Development is permitted by Class D subject to the conditions that when no longer needed as a charging point for electric vehicles—*

- a) the development is removed as soon as reasonably practicable; and*
- b) the wall on which the development was mounted or into which the development was set is, as soon as reasonably practicable, and so far as reasonably practicable, reinstated to its condition before that development was carried out.”*

3.13 In relation to outlets with an upstand, The GPDO (Part 2, Class E) states:

*“E. The installation, alteration or replacement, within an area lawfully used for off-street parking, of an upstand with an electrical outlet mounted on it for recharging electric vehicles.*

*Development not permitted:*

*E.1 Development is not permitted by Class E if the upstand and the outlet would—*

- a) exceed 1.6 metres in height from the level of the surface used for the parking of vehicles;*
- b) be within 2 metres of a highway;*
- c) be within a site designated as a scheduled monument;*
- d) be within the curtilage of a listed building; or*
- e) result in more than 1 upstand being provided for each parking space.*

*Conditions:*

*E.2 Development is permitted by Class E subject to the conditions that when the development is no longer needed as a charging point for electric vehicles—*

- a) the development is removed as soon as reasonably practicable; and*
- b) the land on which the development was mounted or into which the development was set is, as soon as reasonably practicable, and so far as reasonably practicable, reinstated to its condition before that development was carried out.”*

3.14 This application is not seeking to deliver the EV charging points through the Permitted development process. Notwithstanding, the proposed development is delivering EV charging units which are very similar to those allowed under PD rights. It is clear that there is a desire

from national government to facilitate the delivery of electric vehicle charging infrastructure and that the impact of this type of development is typically minimal in most places.

**Local Planning Policy**

3.15 Planning applications should be determined in accordance with s38(6) of the Planning & Compulsory Purchase Act 2004 unless material considerations indicate otherwise.

3.16 The development plan for the Site comprises:

- Blackpool Local Plan Part 1: Core Strategy 2012-2027 (Adopted January 2016)
- Blackpool Local Plan Part 2: Site Allocations and Development Management Policies (Adopted February 2023)

3.17 It is also highly pertinent to note that Blackpool Council declared a Climate Change Emergency in June 2019. This included the commitment to achieving “net zero carbon emissions and 100% clean energy use by 2030”.

3.18 In February 2023, Blackpool Council agreed to endorse the Electric Vehicle Charging Strategy. This is explored further under ‘Material Considerations’ in this section of the report.

3.19 The following Local Plan policies are relevant to the development proposals:

Policy Reference	Description
CS1: Strategic Location of Development	This is an overarching spatial policy which seeks regeneration focus and looks to support growth.
CS3: Economic Development and Employment	This policy promotes sustainable economic to strengthen the local economy and meet the employment needs of Blackpool and the Fylde Coast Sub-Region to 2027
CS5: Connectivity	This policy outlines how a sustainable, high quality transport network for Blackpool and a quality arrival experience will be promoted.
CS6: Green Infrastructure	Green Infrastructure will be protected, enhanced, created and connections enhanced to achieve high-quality connected systems.
DM17: Design Principles	This policy outlines a number of design principles which all new development proposals must adhere to.
DM41: Transport requirements for new development	New development will only be permitted where the access, travel and safety needs of all affected by the development are met. This policy establishes the main requirements relating to highways, transport and parking which will apply to all development.

## Material Considerations

### Taking charge: the electric vehicle infrastructure strategy

3.20 On 25<sup>th</sup> March 2022, the UK Government published 'Taking charge: the electric vehicle infrastructure strategy'.<sup>1</sup> This strategy sets out the government's vision and action plan for the rollout of electric vehicle charging infrastructure in the UK.

3.21 It sets out the vision for more publicly accessible EV charging chargepoints and confirms that these are needed for two main purposes: to enable long distance journeys, and to support those without off-street parking.

3.22 The Vision for 2030 set out in the Strategy states:

*"We will remove charging infrastructure as both a perceived, and a real, barrier to the adoption of electric vehicles (EVs). EV charging should be cheaper and more convenient than refuelling at a petrol station. Specific predictions of the future mix and number of chargepoints are inherently uncertain in 2022 due to rapid developments in battery and charging technology, and because consumer preferences about where and when they would like to charge are still being revealed. The commercial landscape for charging infrastructure is also developing quickly but the balance between fewer, higher-powered chargers and more numerous, lower-powered ones is not yet clear. By 2030, we expect there to be around 300,000 public chargepoints as a minimum in the UK, but there could potentially be more than double that number."*

3.23 Finally, under 'Annex 1. Roles and responsibilities', the Strategy confirms that:

*"Local government has a critical role in planning and delivering electric vehicle charging infrastructure.... Further, local authorities are able to bring wider considerations into the planning and delivery of on-street chargepoints, including granting permissions for the works to take place, approving on-street parking bays associated with chargepoints and balancing demands against other uses of the roads and pavements. This will be increasingly important as we transition to mass market adoption of EVs, and the number of drivers relying on public chargepoints increases."*

### Blackpool EV Strategy (December 2022)

3.24 Blackpool Council have agreed an EV Strategy for the district. The stated aim of this strategy is to "help future proof the town by forecasting anticipated charge point needs over the next five years".

---

1

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1065576/taking-charge-the-electric-vehicle-infrastructure-strategy.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1065576/taking-charge-the-electric-vehicle-infrastructure-strategy.pdf)

3.25 It goes on to set out four key priorities Blackpool council has committed to achieve this, and Priority 3 states:

*“Harness its planning influence: A significant number of large developments are planned in Blackpool. The Planning Team will work closely with developers to ensure that development sites commit to and deliver the maximum number of charge points within viability constraints”*

3.26 This demonstrates the role the planning system will play in delivering the required EV charging infrastructure.

3.27 The Strategy goes on to confirm that 210 new chargers will be needed in town by 2027.

3.28 Under paragraph 7.2 of the Strategy, the roles and responsibilities of key stakeholder groups is set out. Under ‘visitor attractions’, which most closely aligns with the Village Hotel site, it encourages the delivery and *“provision of destination charge points to support the broader network of public charge points”*.

## **4. Proposed Development**

4.1 This section outlines the proposed development details. Please refer to the accompanying plans for information on structures and work proposed.

4.2 The proposed development plans include the following:

- 12 new EV charging parking bays
- Independent Distribution Network (IDNO) substations
- Low Voltage (LV) panels
- Power Cabinets

4.3 The provision of 12 new EV charging parking bays will result in the loss of no. 19 existing car parking bays (net loss 7 car parking spaces) and will involve the removal of a kerb and two small trees to allow for the necessary infrastructure to facilitate the proposed development.

4.4 There will be no changes to the traffic routes and flow for vehicles in this part of the car park area. No material changes in total vehicle trips are expected.

## 5. The Case for Planning Permission

5.1 This section considers the key issues relating to the proposal in the context of relevant national, regional and local planning policy, as well as material considerations.

### ***Principle of Development***

5.2 The proposed EV charging infrastructure is to be located on an existing operational car park. As such, the site can be considered previously developed.

5.3 Policy CS1 (Strategic Location of Development) confirms that there will be a focus for development in Blackpool Town Centre. Notwithstanding, development proposals that support existing businesses are not in contention with the aims of the policy. The site itself is in an area suitable for new development.

### ***Policy Support for EV Charging Infrastructure***

5.4 The Blackpool EV Strategy (December 2022) document is a material consideration to the determination of this planning application. Under paragraph 7.2 of the Strategy, the roles and responsibilities of key stakeholder groups is set out. Under 'visitor attractions', which most closely aligns with the Village Hotel site, it encourages the delivery and "*provision of destination charge points to support the broader network of public charge points*".

5.5 The development proposals should be seen to be in line with this document and importantly seen to support its objectives.

5.6 The wider push to support the transition to a low carbon future in a changing climate is also supported by the development proposals in line with paragraph 157 of the NPPF.

### ***Supporting Local Business***

5.7 Policy CS3 (Economic Development and Employment) confirms that strengthening the local economy is a key objective of the Local Plan. These development proposals will support an existing business that not only employs local residents but supports tourism which much of the local economy is based on.

5.8 As such, the development proposals should be seen to support this policy.

### ***Green Infrastructure***

5.9 The land within the red line is not subject to the CS6 (Green Infrastructure) designation. Notwithstanding, it is located immediately adjacent it. The development proposals have been located in this location to minimise any impact on green infrastructure.

5.10 The removal of two small trees within the car park area to facilitate the development is not considered to have any material impact. The trees do not form part of the green infrastructure designation and could be removed by the landowner at any time.

5.11 As such, the proposals are considered to adhere to the provisions of policy CS6.

***Flood and Drainage***

5.12 The site is located on land classified as Flood Zone 1. Existing surface water drainage arrangements will continue. As such, no additional policy assessment is required.

***Transport***

5.13 The proposed development does not introduce new access arrangements to the existing car park.

5.14 No additional vehicle trips are associated with the provision of EV charging points. Instead these will be utilised by users of the Village Hotel site with EVs.

5.15 The wider site contains disabled parking spaces provided on site, and the proposed development will not be replacing any of these disabled parking spaces.

5.16 As such, the proposals can be considered in adherence with policy DM41 and supports paragraph 114 of the NPPF.



## 6. Summary and Conclusions

- 6.1 Section 5 above demonstrates the scheme's adherence to the Local Plan. Paragraph 11 of the NPPF confirms that for planning applications, decision makers should approve "*development proposals that accord with an up-to-date development plan without delay.*" As such, Blackpool Council should approve the scheme outlined in this Planning Statement.
- 6.2 The development proposals will provide a raft of benefits, which include:
- It supports the transition to highly sustainable modes of transport
  - Supports the sustainability objectives of a local employer
  - Is located on previously developed land
  - Will not cause any adverse impacts on the transport network
- 6.3 The applicant looks forward to working with the local planning authority in helping deliver these positive development proposals.