

Date: 23 April 2024

Our reference: CSC1038

Dear Sir/Madam,

**MOTOR FUEL GROUP
BROXDEN SERVICE STATION, 2 BROXDEN AVENUE, PERTH, PH2 0PX**

Introduction

We write on behalf of Motor Fuel Group with regard to the application for the creation of EV charging zones and erection of sub-station enclosure, LV panel and two jet wash bays at Broxden Service Station.

Site Description

The application site is formed of an existing service station (*Sui Generis*) located at 2 Broxden Avenue, Perth, PH2 0PX. The service station is located to the south of A93 and to the north of Perth Broxden Park & Ride.

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. The Department for Transport published 'Taking Charge: The electric vehicle infrastructure strategy'¹, which notes that *"We expect around 300,000 public chargers as a minimum by 2030. Our goal is to ensure these chargepoints are installed ahead of demand, inspiring confidence in drivers who have not yet made the switch"*. The latest figures² (as at midnight 1 January 2024) shows that there were 53,677 public electric vehicle charging devices installed in the UK, an increase of just 4,457 in the last quarter. At the current pace, just 160,645 would be installed by 2030, with the target of 300,000 not being met until five years later. To meet the target in time, 10,263 chargers would need to be installed each quarter between now and 2030 – a 230% increase over build rate. 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.

¹ [Taking charge: the electric vehicle infrastructure strategy \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/100000/taking-charge-the-electric-vehicle-infrastructure-strategy)

² Electric vehicle charging device statistics: January 2024 - (<https://www.gov.uk/government/statistics/electric-vehicle-charging-device-statistics-january-2024>)



The Broxden Service Station proposals relate to the provision of 8 no. electric vehicle charging points, substation enclosure, LV panel, two jet wash bays, and associated landscaping and forecourt works.

Key Considerations

The National Planning Framework 4 (2023) indicated at Policy 13 that proposals for electric vehicle charging infrastructure and electric vehicle forecourts will be supported. Development proposals will be supported which (*inter alia*) “*iv. provide low or zero-carbon emission vehicle and cycle charging points in safe and convenient locations, in alignment with building standards*”.

Motor Fuel Group’s proposal to install new EV charging points at Broxden 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 proposals do not raise any concerns regarding adverse impact on amenity / conflict in terms of surrounding land uses. The proposed area will be well-lit and does not raise any concerns from anti-social behaviour / natural surveillance perspective.

In terms of design, the proposed EV charging area has been carefully planned to positively integrate with the existing service station operation. The charging facility offers a modern design approach, which is uncluttered and fit for purpose. The proposals will be Equalities Act compliant, offering dropped kerbs and other associated measures to ensure equal ease of access for all.

A similar scheme at Broxden Service Station was validated on 4th of May 2023 under planning ref. 22/02255/FLL, and the application relates to the formation of 8 EV charging bays, installation of 2 jetwash bays, a substation and associated works.

Further drainage information was needed for planning ref. 22/02255/FLL and due to the delay of the missing drainage information, the application was withdrawn on the 18th of October 2023. A drainage impact assessment is now submitted with this application. The proposed development would lead to a loss existing trees, and we have now included 6no. replacement trees within the scheme. Other areas of the site have been considered for this proposed development. However, there are several limitations with this site being a petrol filling station. There are hazardous zones that would have been considered that cannot clash with an 8.5m zone around each EV charger. Putting the chargers closer to the forecourt runs the risk of these zones clashing but also would reduce the number of existing parking bays considerably. Subsequently, this is also a busy HGV site, which have large turning circles, and this limits of what can be installed on the east side of the site.

Submission

The application comprises the following information:

- 13664 - FS702 - BP Block Plan - Rev A
- 13664 - FS702 - LP Location Plan - Rev A
- 13664 - FS702 - P01 Existing Site Layout Rev D
- 13664 - FS702 - P02 Proposed Site Plan Rev G
- 13664 - FS702 - P03 Jet Wash Elevations Rev C
- 13664 - FS702 - P04 Substation Elevations Rev C
- 13664 - FS702 - P05 EV Charger Details
- 20240112_Broxden_DIA_v1_ISSUE – Drainage Impact Assessment

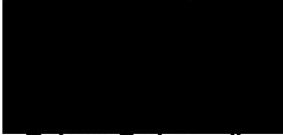


Conclusions

The EV charging proposals are considered to positively respond to the local and national planning policy context and the wider UK aspiration to promptly improve the EV charging network. 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,



Rahma Dwimunali
Assistant Planner
CarneySweeney

Encl.

