



McGovern Park Proposed EV Hub

Planning Statement incorporating Design,
Access & Environmental Management

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Contents

1. Introduction.....	3
2. Site Description	4
3. Proposed Development & Specifications	5
4. Noise Impact	8
5. Access & Parking Impact	9
6. Biodiversity Net Gain	9
7. Community Benefits.....	10
8. Signage	10
9. Planning Policy Compliance.....	12
10. Summary	22

1. Introduction

- 1.1. Entrust Professional Services Limited (Entrust) were instructed by ESB Innovation UK Limited (ESB) to submit a planning application for an EV charging hub in the car park of McGovern Park GAA club in the Ruislip area of West London.
- 1.2. Detailed desktop feasibility studies examined the planning designations at the site to identify key risks and issues. The site at McGovern Park is clear from sensitive ecological, heritage and landscape designations. The only designation that bears relevance to the project at the site location is the presence of the Metropolitan Green Belt. This is discussed in Chapter 10 of this report.
- 1.3. ESB are rolling out a network of ultra-rapid EV chargers across Great Britain, including large clusters in Greater London, Birmingham, Coventry with sites also present in Wales and Scotland. To date, ESB operates a growing network of over 2100 publicly accessible EV Chargers.
- 1.4. ESB are rolling out their network through both on-street and off-street sites. The off-street sites such as the proposed site at McGovern Park utilise ultra-rapid chargers are designed for shorter, less frequent charger cycles. The strategic location of the off-street sites mean that the sites can be accessed easily from major thoroughfares such as Motorway Junctions, Dual Carriageways and Transport for London (TfL) roads. The sites chosen by ESB are often purposely located away from residential properties which directly neighbour the site to protect residential amenity as much as possible whilst being close enough to offer a realistic opportunity to recharge vehicles both for local residents and longer distance commuters.
- 1.5. ESB source 100% renewable energy to power their ultra-rapid chargers. This keeps the environmental impact as low as possible and ensures that electric vehicles are not being powered indirectly by fossil fuels.

2. Site Description

- 2.1 The site is located at McGovern Park, a Gaelic Athletics Association sports ground where Gaelic Sports such as Hurling and Gaelic Football are played. The site sits to the north of the car park where away teams coaches currently drop off players on match days. When competitions and tournaments are not being held, the area is vacant and does not form part of the formal car parking arrangements.
- 2.2 The site is located just off the eastern side of West End Road which is a local authority managed main road, connecting the A40 Dual Carriageway (approximately 165m to the south of the site) to Ruislip High Street (approximately 3.45km north west of the site).
- 2.3 The site sits just within the Metropolitan Green Belt, the boundary of the site shares a boundary with the Green Belt boundary. The proposed development sits within an existing car park. The baseline visual appearance and impact upon the openness of the Green Belt is expected to be minimal, is very similar to the current baseline and is discussed in Chapter 10 of this report.
- 2.4 The site currently comprises; a tarmac coach set down area; gravel edging at the boundary; concrete post and wooden fence panel fencing, steel gates and a drainage gully. Lighting for the coach set down area is minimal, light spill from the existing pole mounted flood lights in the car park (outside of the red line boundary) offers a small degree of background light.
- 2.5 The site is located opposite RAF Northolt and in the vicinity of the Polish Air Force Memorial, which is a designated Grade II listed structure. Owing to the separation distance, intervening development and the nature of the proposed development, it is considered unlikely that the proposal would be visible from the memorial or would affect its setting or significance. As such, no adverse impacts on this designated heritage asset are anticipated.
- 2.6 The site is not situated within a designated Conservation Area. While there are Conservation Areas within the wider locality, the proposed development is not anticipated to be visible from these areas due to the separation distance, existing built form and surrounding vegetation. As a result, the proposal is not expected to affect the character, appearance or setting of any nearby Conservation Area, and no adverse heritage impacts are identified in this regard.
- 2.7 The site benefits from a highly accessible location adjacent to the A40, one of the principal arterial routes linking Central and West London with the M40 motorway. The M40 provides a strategic connection to Birmingham and the wider Midlands and North West of England, making the site well positioned to serve both local traffic and longer-distance journeys. Its location on this key transport corridor supports the provision of infrastructure intended to serve passing motorists.
- 2.8 The site's proximity to Heathrow Airport is a significant locational advantage. Heathrow is one of the UK's busiest international airports and generates substantial volumes of traffic, including private vehicles, taxis, rental vehicles and long-distance travellers. The proposed development is therefore well placed to serve users requiring convenient charging facilities before or after airport journeys, particularly those using hire vehicles or undertaking longer-distance travel. This strategic location is expected to support demand for electric vehicle charging infrastructure and enhance the convenience of sustainable transport options in the area.

3. Proposed Development & Specifications

- 3.1 The primary purpose of the site is to provide an electric vehicle charging hub. To facilitate the EV charging hub, ancillary infrastructure is required. This is outlined below. Where deemed necessary, additional reports have been produced to demonstrate the impact on the local area, including; a noise assessment and transport assessment. Further details on these detailed studies can be found in Chapters 4 and 5 of this planning statement.
- 3.2 The proposed EV hub will be open 24/7 and will be accessed from the existing entrance to McGovern Park Car Park. In order to prevent anti-social behaviour in the main GAA club car park, a proposed fence is to be installed which will separate the GAA club car park from the EV hub. In the fenceline, there will be 2no gates to allow the car park at McGovern Park to circulate when the car park is in use. These gates will be closed at all other times.
- 3.3 A new grid connection has been granted to provide the required electricity to the site. The grid connection will connect into a proposed substation to the western side of the site, before cabling will connect into a distribution / feeder pillar. Internal cabling will then run underground to each charger unit upstand.
- 3.4 A full description of the components of the EV hub is provided below.

EV Chargers

- 3.5 Each charger will be able to charge two vehicles simultaneously. The chargers are Alpitronic HYC 300 chargers which are classed as “Ultra-Rapid”. The chargers are rated up to 300kW and are capable of charging an average electric car from 20% – 80% in less than 15 minutes.
- 3.6 The chargers will feature tap and go contactless card payment options, removing barriers to those who are not registered with ESB, allowing fair and open pricing.

Lighting

- 3.7 3no. lighting columns are proposed to illuminate the proposed site. The luminaires will be Schreder Avento 1 luminaires which provide a warm white light at 2700 kelvins, similar to the colour of a traditional incandescent light bulb. The warmer light temperature not only is more inviting and comfortable for humans, it complies with dark sky standards and has a lesser impact on wildlife and insects during the night.

The luminaires will be fixed on 6m high Fabrikat galvanised steel columns with 500mm outreach brackets. The luminaires will each be controlled by a dusk-dawn photocell and will be always dimmed to approximately 50% of the maximum output (approximately 10,500 lumens per luminaire).

- 3.8 The luminaires will be located on outreach brackets with a 5 degree tilt to aim light slightly away from the properties to the north of the site boundary and back into the club car park. This degree tilt is minimal and will retain the dark sky compliance of the luminaires whilst reducing light spill into neighbouring properties as much as possible.

Substation & Distribution Pillar

- 3.9 A small substation cabin and distribution pillar/cabinet will be located near the entrance gate to the site. The design of the cabinet will be informed by UK Power Network's (DNO) requirements.

Fencing

- 3.10 The site will be secured by 2.4m high V-Mesh fencing around the perimeter. V-Mesh fencing provides a tidy alternative to palisade fencing which is often too aggressive in appearance for built up and peripheral areas such as the site at McGovern Park. The fencing is not climbable and is modular, so can easily and cheaply be replaced if damaged, ensuring the site can be maintained easily into the future.

Gates

- 3.11 In total, two gates will be located at the site. The existing gate at the entrance of the site at West End Road will be removed. Two additional gates are proposed on the southern boundary of the site. These gates will slide, rather than swing to limit any further loss of parking spaces at the site. The gates will remain closed for the majority of the time. The GAA club will be able to open the gates when required either for emergency access to the site if the GAA club proposed access/egress further south is blocked, or to allow cars to circulate in the car park on busy matchdays / training. Keys to these gates will remain on-site and will be handed to the GAA club to manage.

Hardstanding

- 3.12 The site is currently predominantly asphalt. Some poured concrete pavement is present at the boundary edge and where the proposed substation will be located to the north west of the site. The proposed hardstanding is to be retained and replaced where required following channelling and construction works. There is a very small strip of gravel to the north of the site boundary along the existing fence line which will be retained. There will be no change to the type or amount of hardstanding at the site.
- 3.13 Additional road markings will be painted on the surface to direct vehicles around the site. These will include entry/give way markings, directional arrows, no-entry and entrance text and EV bay markings. To provide a good level of contrast, the EV bays will be painted in a textured colour surface to differentiate between standard parking bays.
- 3.14 Surface water drainage is not proposed to be changed. Currently surface water drains from the hardstanding into a drainage gully. The proposal is limited in space to incorporate a formal SuDS scheme, therefore surface water drainage arrangements are to remain the same. There will be no net increase in surface water as a result of this proposal.

Bollards

- 3.15 Each charger unit will be protected by 2no. bollards. The bollards are expected to be fixed / non-removable and will be approximately 800mm AGL once installed and approximately 110mm in diameter. The proposed bollards will be brushed stainless steel or painted in a gloss black finish (exact finish not yet determined).

CCTV

- 3.16 CCTV is not proposed in this planning application. ESB operate a number of charging hubs across Great Britain and have not yet seen a real need for permanent CCTV systems to be installed. If CCTV is deemed to be required in the future, a separate planning application will be submitted in the future.

Litter Bins

- 3.17 Similarly to CCTV cameras, ESB have not yet seen a need for litter bins at the EV hubs. Most charging cycles are approximately 5 – 15 minutes long. This short dwell time and absence of a shop at the site means the chance of litter generated to be low. If litter does become a problem at the site, ESB will review their maintenance contract and will look to install dry-mixed recycling and non-recyclable litter bins at the site.

4. Noise Impact

- 4.1 Noise has been considered by ESB from the outset of the project when the site was selected. Electronic humming noises are often noted as one of the things that disturb neighbour the most. To address this, ESB have intentionally sited the EV hub close to a major road junction where there is a large amount of background traffic noise and as far away from residential dwellings on West End Road and Masson Avenue.
- 4.2 In addition to the embodied mitigation in the design of the site, ESB have instructed a noise impact assessment should be undertaken to determine if the proposed development would have an unacceptable impact on neighbouring sensitive receptors.
- 4.3 A Noise Impact Assessment has been prepared by Philip Dunbavin Acoustics to assess the potential effects of the proposed EV Hub on the nearest residential receptors. The assessment included an extensive programme of on-site noise monitoring over both daytime and night-time periods, together with predictive modelling of the proposed charging infrastructure, substation and associated vehicle movements in accordance with BS4142:2014+A1:2019.
- 4.4 The survey confirmed that the site is already characterised by a relatively high and well-established background noise environment. Measurements recorded consistently elevated ambient noise levels, reflecting the site's location adjacent to the busy West End Road (A4180), an existing public car park and nearby commercial uses, including a motor vehicle workshop. Continuous road traffic and regular vehicle movements were identified as the dominant noise sources throughout both the daytime and overnight monitoring periods, resulting in representative background noise levels of 51dB LA90 during the day and 50dB LA90 at night. These findings demonstrate that the site is not located within a tranquil acoustic environment but instead experiences a consistently active background noise climate.
- 4.5 Using these measured background levels, the assessment modelled the worst-case operational scenario for the proposed development, including all EV charging equipment operating simultaneously alongside associated parking activity. The predicted rating level at the nearest residential property was calculated to be approximately 41dB during the daytime and 40dB during the night. This is around 10dB below the prevailing background noise levels and substantially lower than the threshold at which BS4142 indicates adverse impacts are likely to occur.
- 4.6 The assessment concludes that the operational noise generated by the proposed EV Hub would be effectively absorbed within the existing acoustic environment and would not materially alter the established noise climate experienced by nearby residents. Given the already significant influence of road traffic and existing commercial activity, the proposed development would not introduce noise that is out of character with the area. Accordingly, the report concludes that the proposal would have a low acoustic impact, would not give rise to adverse effects on neighbouring amenity and complies with the requirements of the National Planning Policy Framework and relevant local planning policy.

5. Access & Parking Impact

- 5.1 As part of the proposal, one coach drop-off point will be lost in addition to the loss of 6 no. car parking space in McGovern Park Car Park. The coach drop-off point is used primarily to load/unload passengers before the coach parked in a designated coach park off-site. This arrangement is not proposed to change, however instead of dropping passengers off and picking them up inside the McGovern Park complex, they are proposing to stop either; at one of the Bus Stops on West End Road or; alongside the site on West End Road. West End Road does not have any clearway or red route status outside the site, nor do the bus stops limit their use to “local buses only”, therefore picking up passengers is permitted at the above locations. Coach parking will be located offsite at a dedicated facility near Heathrow Airport and no coaches will be permitted to park along West End Road at any time.
- 5.2 A Transport Assessment has been prepared by Local Transport Projects Ltd in support of the proposed development. The assessment concludes that the proposed EV Charging Hub can be accommodated safely within the existing highway network and will not result in any significant adverse transport impacts. The development will utilise an existing vehicular access from West End Road, which will be adapted to facilitate two-way vehicle movements, while maintaining appropriate visibility and safe operation. The proposals will result in the reconfiguration of the existing car park, including the loss of up to six parking spaces, leaving 63 spaces available for matchday use. The assessment concludes that this reduction will not materially affect parking provision or the operation of McGovern Park during events. Based on TRICS trip generation data, the development is forecast to generate a maximum of three two-way vehicle movements during the AM peak hour, four during the PM peak hour, and approximately 50 two-way movements across a typical weekday, representing a very low level of additional traffic. Accordingly, the Transport Note concludes that the proposal would not have an unacceptable impact on highway safety or the operation of the surrounding road network and is therefore consistent with the transport objectives of the National Planning Policy Framework.

6. Biodiversity Net Gain

- 6.1 A site walkover was completed by Neil Gates, Associate Director of Planning on the 10th of June 2026. Due to the small size of the site (under 10,000 sq/m), the absence of priority habitats and the fact that the site is for a non-residential development, the Biodiversity Net Gain (BNG) Small-Site Metric was used.
- 6.2 The BNG Small Site Metric was completed by Neil Gates. The metric version used was Version 1.2.3 (release date: 3rd July 2025). To ensure the BNG Small Site Metric was completed correctly, Dr Sorchá Cronin O'Reilly, Head of Ecology at Entrust Professional Services Ltd, reviewed the metric to verify the results. The metric revision number is 1.1 and was completed on 7th August 2026.
- 6.3 The site comprises the area habitat types sealed surfaces (asphalt and concrete) and unvegetated, unsealed surface (a small strip of pea gravel). Both area habitat types are artificial. No linear habitats like hedgerows, treelines or watercourses occur on site, and no biotic area habitats occur on site. Due to the small footprint of the site, limited areas are

present to develop natural features, and limited opportunities exist to enhance the urban habitat types on site. The metric confirmed that all the key rules have been satisfied.

- 6.4 The baseline habitat units were zero, which means that a 10% net gain in biodiversity units is not required for this site.

7. Community Benefits

- 7.1 The proposed development will provide publicly accessible electric vehicle (EV) charging infrastructure, supporting the transition to low-emission transport and contributing to local and national climate action objectives.
- 7.2 The installation of EV chargers will improve charging availability for residents, visitors, and local businesses, encouraging greater uptake of electric vehicles by addressing charging accessibility and convenience.
- 7.3 The proposed development is expected to generate minimal environmental impacts during operation. The EV charging infrastructure will not give rise to significant operational noise, or visual movement, and therefore will not adversely affect nearby residential properties or community facilities.
- 7.4 The assessment identified that the proposed EV charging development will provide a positive community benefit by supporting sustainable transport, reducing greenhouse gas emissions associated with road transport, and enhancing the local charging network. The development is not expected to result in significant adverse effects on residential amenity or the surrounding environment.

8. Signage

- 8.1 The proposed development includes a site identification sign associated with the operation of the EV Hub. The signage is intended solely to identify the facility and assist users in accessing the charging infrastructure. The design has been kept proportionate to the scale and function of the development and is not considered to detract from the character of the surrounding area. Should advertisement consent be required under the Town and Country Planning (Control of Advertisements) (England) Regulations 2007, this will be sought separately as appropriate.
- 9.2 Indicative Option 1 – Freestanding Signage The first indicative signage option comprises two non-illuminated, freestanding signs, each measuring approximately 3.0m in length by 1.0m in height, mounted on supporting poles within the site. The signs are intended solely to provide site identification and wayfinding and would not incorporate any illuminated, digital, or dynamic display elements.

Further details of this option are provided on drawing 'McGovern Park- MCG- PD-DR-05 Proposed Layout 1:200 Indicative Signage Option 1.

- 9.3 Indicative Option 2 – Integrated Boundary Signage The second indicative option involves integrating the site identification signage into the proposed replacement boundary treatment. Under this approach, graphics would be applied directly to the new composite fencing panels

along a section of the site frontage. The signage could extend for approximately 10m in length along the boundary fence, which is approximately 1.8m in height.

Further details of this option are provided on drawing 'McGovern Park- MCG- PD-DR-06 Proposed Layout 1:200 Indicative Signage Option 2.

- 9.4 The final signage design remains subject to detailed design development and agreement with the Planning Authority. At this stage, the two options presented are indicative only and are included solely to demonstrate the potential form, scale, and extent of the proposed site identification signage.



Figure One: Indicative Signage for the EV Charging Hub– The graphic shown is for illustrative purposes only and may be subject to minor amendments during the detailed design stage.

9. Planning Policy Compliance

- 10.1. The proposed development has been assessed against the relevant national, regional and local planning policy framework, including the **National Planning Policy Framework (2024)**, the **London Plan (2021)** and the **Hillingdon Local Plan Part 2 (2020)**. Particular regard has been given to policies relating to sustainable transport, the provision of electric vehicle charging infrastructure, design quality, environmental sustainability and development within the Metropolitan Green Belt. The assessment demonstrates that the proposal supports the transition to low-emission transport through the delivery of publicly accessible EV charging infrastructure while respecting the openness and purposes of the Metropolitan Green Belt. As set out in the following sections, the proposed development has been carefully designed to minimise its physical and visual impact, preserve the essential characteristics of the Green Belt, and accord with the relevant national, regional and local planning policies. Where Green Belt considerations apply, the proposal is assessed against the applicable policy tests and demonstrates that the development represents an appropriate and sustainable form of development that does not conflict with the fundamental aims of Green Belt designation

National Planning Policy Framework, 2024

- 10.2 The National Planning Policy Framework (NPPF) (2024) sets out the Government's planning policies for England and establishes how these should be applied in determining planning applications. The proposed electric vehicle (EV) charging hub has been assessed against the relevant provisions of the Framework, particularly those relating to sustainable transport, achieving well-designed places, supporting the transition to low-carbon infrastructure, and promoting sustainable patterns of development. The proposal seeks to enhance local EV charging provision within an accessible location, facilitating the uptake of ultra-low emission vehicles while ensuring that the development is compatible with its surroundings and does not give rise to unacceptable environmental or transport impacts.
- 10.3 **Paragraph 109:** Transport issues should be considered from the earliest stages of plan-making and development proposals, using a vision-led approach to identify transport solutions that deliver well-designed, sustainable and popular places. This should involve:
- a) making transport considerations an important part of early engagement with local communities;*
 - b) ensuring patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places;*
 - c) understanding and addressing the potential impacts of development on transport networks;*
 - d) realising opportunities from existing or proposed transport infrastructure, and changing transport technology and usage – for example in relation to the scale, location or density of development that can be accommodated;*
 - e) identifying and pursuing opportunities to promote walking, cycling and public transport use; and*

f) identifying, assessing and taking into account the environmental impacts of traffic and transport infrastructure – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains.

9.4 Paragraph 110: *The planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making.*

9.5 Paragraph 115: *In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:*

a) sustainable transport modes are prioritised taking account of the vision for the site, the type of development and its location;

b) safe and suitable access to the site can be achieved for all users;

c) the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code48; and

d) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree through a vision-led approach.

9.6 Paragraph 117 *Applications for development should:*

a) give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use;

b) address the needs of people with disabilities and reduced mobility in relation to all modes of transport;

c) create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards;

d) allow for the efficient delivery of goods, and access by service and emergency vehicles; and

e) be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.

9.7 Paragraph 125: *Planning policies and decisions should:*

a) encourage multiple benefits from both urban and rural land, including through mixed use schemes and taking opportunities to achieve net environmental gains – such as developments that would enable new habitat creation or improve public access to the countryside;

b) recognise that some undeveloped land can perform many functions, such as for wildlife, recreation, flood risk mitigation, cooling/shading, carbon storage or food production;

c) give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, proposals for which should be approved unless substantial harm would be caused, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land;

d) promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively (for example converting space above shops, and building on or above service yards, car parks, lockups and railway infrastructure)⁵⁰; and

e) support opportunities to use the airspace above existing residential and commercial premises for new homes. In particular, they should allow upward extensions – including mansard roofs – where the development would be consistent with the prevailing form of neighbouring properties and the overall street scene, is well-designed (including complying with any local design policies and standards), and can maintain safe access and egress for occupiers. A condition of simultaneous development should not be imposed on an application for multiple upward extensions unless there is an exceptional justification

9.8 Paragraph 135 *Planning policies and decisions should ensure that developments:*

a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;

b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;

c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);

d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;

e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and

f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users⁵¹; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.

9.9 Paragraph 140: *Local planning authorities should ensure that relevant planning conditions refer to clear and accurate plans and drawings which provide visual clarity about the design of the development and are clear about the approved use of materials where appropriate. This will provide greater certainty for those implementing the planning permission on how to comply with the permission and a clearer basis for local planning authorities to identify breaches of planning control. Local planning authorities should also seek to ensure that the quality of approved development is not materially diminished between permission and completion, as a result of changes being made to the permitted scheme (for example through changes to approved details such as the materials used).*

10.10 Paragraph 14:1 *The quality and character of places can suffer when advertisements are poorly sited and designed. A separate consent process within the planning system controls the*

display of advertisements, which should be operated in a way which is simple, efficient and effective. Advertisements should be subject to control only in the interests of amenity and public safety, taking account of cumulative impacts.

10.11 **Paragraph 153:** *When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt, including harm to its openness⁵⁵. Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. ‘Very special circumstances’ will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.*

10.12 **Paragraph 154:** *Development in the Green Belt is inappropriate unless one of the following exceptions applies:*

a) buildings for agriculture and forestry;

b) the provision of appropriate facilities (in connection with the existing use of land or a change of use), including buildings, for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it;

c) the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building;

d) the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;

e) limited infilling in villages;

f) limited affordable housing for local community needs under policies set out in the development plan (including policies for rural exception sites); and

g) limited infilling or the partial or complete redevelopment of previously developed land (including a material change of use to residential or mixed use including residential), whether redundant or in continuing use (excluding temporary buildings), which would not cause substantial harm to the openness of the Green Belt. h) Other forms of development provided they preserve its openness and do not conflict with the purposes of including land within it. These are: i. ii. mineral extraction; engineering operations; iii. local transport infrastructure which can demonstrate a requirement for a Green Belt location; iv. the re-use of buildings provided that the buildings are of permanent and substantial construction; v. material changes in the use of land (such as changes of use for outdoor sport or recreation, or for cemeteries and burial grounds); and vi. development, including buildings, brought forward under a Community Right to Build Order or Neighbourhood Development Order.

9.13 **Paragraph 155:** *The development of homes, commercial and other development in the Green Belt should also not be regarded as inappropriate where all the following apply:*

a. The development would utilise grey belt land and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan;

b. There is a demonstrable unmet need for the type of development proposed⁵⁶;

c. The development would be in a sustainable location, with particular reference to paragraphs 110 and 115 of this Framework⁵⁷;

- 9.14 The proposed EV charging hub is considered to be consistent with the objectives of the National Planning Policy Framework (2024). The development supports the transition to sustainable transport by providing accessible charging infrastructure for electric vehicles, in accordance with paragraphs 109, 110, 115 and 117, which seek to promote sustainable travel choices and enable the charging of plug-in and other ultra-low emission vehicles. The proposal has been designed to integrate appropriately with the site, maintaining safe access for all users while avoiding unacceptable impacts on the surrounding highway network or neighbouring amenity.
- 9.15 Furthermore, the proposal accords with the Framework's overarching objectives of achieving well-designed, sustainable development that supports environmental improvement and the transition to a low-carbon economy. Subject to the detailed considerations set out elsewhere within this Planning Statement, the development is considered to comply with the relevant provisions of the NPPF (2024) and should therefore be afforded significant weight in the determination of the application.

London Plan, 2021

- 10.16 The proposed development has been assessed against the relevant policies of the London Plan (2021), with particular regard to Policy GG2 (Making the Best Use of Land), Policy D2 (Infrastructure Requirements for Sustainable Densities) and Policy D8 (Public Realm). These policies seek to promote sustainable, well-connected development that makes efficient use of land, supports the delivery of infrastructure required for the transition to a low-carbon economy, and enhances the quality, accessibility and functionality of the public realm. The proposed EV charging hub contributes to these strategic objectives by providing essential charging infrastructure in an accessible location, supporting the uptake of electric vehicles while ensuring that the scale, layout and design of the development integrate appropriately with the surrounding environment, including its Metropolitan Green Belt context.

- 10.17 **Policy GG2:** *Making the best use of land To create successful sustainable mixed-use places that make the best use of land, those involved in planning and development must:*

A enable the development of brownfield land, particularly in Opportunity Areas, on surplus public sector land, and sites within and on the edge of town centres, as well as utilising small sites

B prioritise sites which are well-connected by existing or planned public transport

C proactively explore the potential to intensify the use of land to support additional homes and workspaces, promoting higher density development, particularly in locations that are well-connected to jobs, services, infrastructure and amenities by public transport, walking and cycling

D applying a design-led approach to determine the optimum development capacity of sites

E understand what is valued about existing places and use this as a catalyst for growth, renewal, and place-making, strengthening London's distinct and varied character

F protect and enhance London's open spaces, including the Green Belt, Metropolitan Open Land, designated nature conservation sites and local spaces, and promote the creation of new green infrastructure and urban greening, including aiming to secure net biodiversity gains where possible

G plan for good local walking, cycling and public transport connections to support a strategic target of 80 per cent of all journeys using sustainable travel, enabling car-free lifestyles that allow an efficient use of land, as well as using new and enhanced public

transport links to unlock growth H maximise opportunities to use infrastructure assets for more than one purpose, to make the best use of land and support efficient maintenance.

10.18 Policy D2: *Infrastructure requirements for sustainable densities A B C The density of development proposals should:*

1) consider, and be linked to, the provision of future planned levels of infrastructure rather than existing levels

2) be proportionate to the site's connectivity and accessibility by walking, cycling, and public transport to jobs and services (including both PTAL and access to local services)²⁶. Where there is currently insufficient capacity of existing infrastructure to support proposed densities (including the impact of cumulative development), boroughs should work with applicants and infrastructure providers to ensure that sufficient capacity will exist at the appropriate time. This may mean that if the development is contingent on the provision of new infrastructure, including public transport services, it will be appropriate that the development is phased accordingly. When a proposed development is acceptable in terms of use, scale and massing, given the surrounding built form, uses and character, but it exceeds the capacity identified in a site allocation or the site is not allocated, and the borough considers the planned infrastructure capacity will be exceeded, additional infrastructure proportionate to the development should be delivered through the development. This will be identified through an infrastructure assessment during the planning application process, which will have regard to the local infrastructure delivery plan or programme, and the CIL contribution that the development will make. Where additional required infrastructure cannot be delivered, the scale of the development should be reconsidered to reflect the capacity of current or future planned supporting infrastructure.

10.19 Policy D8: *Public realm A Development Plans and development proposals should: encourage and explore opportunities to create new public realm where appropriate B C D E F ensure the public realm is well-designed, safe, accessible, inclusive, attractive, well-connected, related to the local and historic context, and easy to understand, service and maintain. Landscape treatment, planting, street furniture and surface materials should be of good quality, fit-for-purpose, durable and sustainable. Lighting, including for advertisements, should be carefully considered and well-designed in order to minimise intrusive lighting infrastructure and reduce light pollution maximise the contribution that the public realm makes to encourage active travel and ensure its design discourages travel by car and excessive on street parking, which can obstruct people's safe enjoyment of the space. This includes design that reduces the impact of traffic noise and encourages appropriate vehicle speeds be based on an understanding of how the public realm in an area functions and creates a sense of place during different times of the day and night, days of the week and times of the year. In particular, they should demonstrate an understanding of how people use the public realm, and the types, location and relationship between public spaces in an area, identifying where there are deficits for certain activities, or barriers to movement that create severance for pedestrians and cyclists ensure both the movement function of the public realm and its function as a place are provided for and that the balance of space and time given to each reflects the individual characteristics of the area. The priority modes of travel for the area should be identified and catered for, as appropriate. Desire lines for people walking and cycling should be a particular focus, including the placement of street crossings, which should be regular, convenient and accessible ensure there is a mutually supportive relationship between the space, surrounding buildings and their uses, so that the public realm enhances the amenity and function of buildings and the design of buildings contributes to a vibrant public realm* ¹³⁵ *To table of contents* ¹³⁵ *The London Plan 2021 – Chapter 3 Design G H I J K L M N O 8 ensure buildings are*

of a design that activates and defines the public realm, and provides natural surveillance. Consideration should also be given to the local microclimate created by buildings, and the impact of service entrances and facades on the public realm ensure appropriate management and maintenance arrangements are in place for the public realm, which maximise public access and minimise rules governing the space to those required for its safe management in accordance with the Public London Charter incorporate green infrastructure such as street trees and other vegetation into the public realm to support rainwater management through sustainable drainage, reduce exposure to air pollution, moderate surface and air temperature and increase biodiversity ensure that appropriate shade, shelter, seating and, where possible, areas of direct sunlight are provided, with other microclimatic considerations, including temperature and wind, taken into account in order to encourage people to spend time in a place ensure that street clutter, including street furniture that is poorly located, unsightly, in poor condition or without a clear function is removed, to ensure that pedestrian amenity is improved. Consideration should be given to the use, design and location of street furniture so that it complements the use and function of the space. Applications which seek to introduce unnecessary street furniture should be refused explore opportunities for innovative approaches to improving the public realm such as open street events and Play Streets create an engaging public realm for people of all ages, with opportunities for social activities, formal and informal play and social interaction during the daytime, evening and at night. This should include identifying opportunities for the meanwhile use of sites in early phases of development to create temporary public realm ensure that any on-street parking is designed so that it is not dominant or continuous, and that there is space for green infrastructure as well as cycle parking in the carriageway. Parking should not obstruct pedestrian lines ensure the provision and future management of free drinking water at appropriate locations in the new or redeveloped public realm.

10.20 The proposed EV charging hub is considered to accord with the relevant objectives of the London Plan (2021). The development represents an efficient and sustainable use of the site by delivering infrastructure that supports London's transition to zero-emission transport and contributes to the wider decarbonisation of the transport network. The proposal has been designed to maintain safe and convenient access for all users, integrate with existing transport infrastructure, and avoid adverse impacts on the character, function and quality of the surrounding public realm.

10.21 Furthermore, the development has been designed to minimise its physical and visual impact, ensuring that it respects the openness and function of the Metropolitan Green Belt while providing infrastructure that is necessary to support sustainable travel. Accordingly, the proposal is considered to comply with the strategic aims of Policies GG2, D2 and D8 of the London Plan (2021), and should be afforded significant weight in the determination of the application.

Hillingdon Local Plan, 2020 (Part 2)

9.22 The proposed development has been assessed against the relevant policies of the Hillingdon Local Plan Part 2 (2020), with particular regard to Policies DMHB 15 (Planning for Safer Places), DMEI 4 (Development in the Green Belt or on Metropolitan Open Land), DMEI 14 (Air Quality), DMT 2 (Highways Impacts), DMT 6 (Vehicle Parking) and, where applicable, Policy

DMAV 3 (RAF Northolt). Collectively, these policies seek to ensure that new development is appropriately designed, protects the openness and function of the Metropolitan Green Belt, promotes sustainable transport, safeguards highway safety and residential amenity, and contributes to improved environmental quality. The proposed EV charging hub has been designed to provide essential low-emission transport infrastructure while minimising its physical and visual impact, maintaining safe access arrangements, and ensuring that the development integrates sensitively within its surroundings.

9.23 Policy DMHB 15: *The Council will require all new development to ensure safe and attractive public and private spaces by referring to the Council's latest guidance on Secured by Design principles. Where relevant, these should be included in the Design and Access Statement. Development will be required to comprise good design and create inclusive environments whilst improving safety and security by incorporating the following specific measures: i) providing entrances in visible, safe and accessible locations; ii) maximising natural surveillance; iii) ensuring adequate defensible space is provided; iv) providing clear delineations between public and private spaces; and v) providing appropriate lighting and CCTV.*

9.24 Policy DMEI 4: *Development in the Green Belt or on Metropolitan Open Land*

A) Inappropriate development in the Green Belt and Metropolitan Open Land will not be permitted unless there are very special circumstances.

B) Extensions and redevelopment on sites in the Green Belt and Metropolitan Open Land will be permitted only where the proposal would not have a greater impact on the openness of the Green Belt and Metropolitan Open Land, and the purposes of including land within it, than the existing development, having regard to: i) the height and bulk of the existing building on the site; ii) the proportion of the site that is already developed; iii) the footprint, distribution and character of the existing buildings on the site; iv) the relationship of the proposal with any development on the site that is to be retained; and v) the visual amenity and character of the Green Belt and Metropolitan Open Land.

9.25 Policy DMEI 14: *Air Quality*

A) Development proposals should demonstrate appropriate reductions in emissions to sustain compliance with and contribute towards meeting EU limit values and national air quality objectives for pollutants.

B) Development proposals should, as a minimum: i) be at least "air quality neutral"; ii) include sufficient mitigation to ensure there is no unacceptable risk from air pollution to sensitive receptors, both existing and new; and iii) actively contribute towards the improvement of air quality, especially within the Air Quality Management Area.

9.26 Policy DMT 2 *Development proposals must ensure that: i) safe and efficient vehicular access to the highway network is provided to the Council's standards; ii) they do not contribute to the deterioration of air quality, noise or local amenity or safety of all road users and residents; iii) safe, secure and convenient access and facilities for cyclists and pedestrian are satisfactorily accommodated in the design of highway and traffic management schemes; iv) impacts on local amenity and congestion are minimised by routing through traffic by the most direct means to the strategic road network, avoiding local distributor and access roads; and v) there are suitable mitigation measures to address any traffic impacts in terms of capacity and functions of existing and committed roads, including along roads or through junctions which are at capacity.*

9.27 **Policy DMT 6: Vehicle Parking**

A) Development proposals must comply with the parking standards outlined in Appendix C Table 1 in order to facilitate sustainable development and address issues relating to congestion and amenity. The Council may agree to vary these requirements when: i) the variance would not lead to a deleterious impact on street parking provision, congestion or local amenity; and/or ii) a transport appraisal and travel plan has been approved and parking provision is in accordance with its recommendations.

B) All car parks provided for new development will be required to contain conveniently located reserved spaces for wheelchair users and those with restricted mobility in accordance with the Council's Accessible Hillingdon SPD.

9.28 **Policy DMAV 3 RAF: Northolt Development proposals within the RAF Northolt boundary will only be supported where:** i) they relate directly to the military base and/or aerodrome related use or development*; ii) there is no decrease in residential amenity through noise from aircraft and hours of operations; iii) there is no increase in traffic congestion during highway network peak hours on West End Road through the operation of RAF Northolt's traffic signals; iv) any transport impacts from the development are managed through the implementation of appropriate mitigation measures identified in a transport assessment or statement and/or travel plan; and v) there is consistency with other policies of the Local Plan.

9.29 The proposed EV charging hub is considered to accord with the relevant policies of the Hillingdon Local Plan Part 2 (2020). The development has been designed to deliver essential electric vehicle charging infrastructure in a manner that maintains highway safety, provides appropriate parking and accessibility, and incorporates design measures that promote user safety and security. The proposal is also expected to make a positive contribution to local air quality by supporting the transition to low-emission vehicles, consistent with the Council's environmental objectives.

9.30 Furthermore, the proposal has been carefully designed to preserve the openness and visual character of the Metropolitan Green Belt through its limited scale, siting and appearance, ensuring that it does not result in unacceptable harm to the purposes of Green Belt designation. Where relevant, the development has also been assessed against the operational and transport considerations associated with RAF Northolt and is not expected to give rise to unacceptable impacts. Overall, the proposal is considered to comply with the relevant provisions of the Hillingdon Local Plan Part 2 (2020) and should therefore be afforded significant weight in the determination of the application

Metropolitan Green Belt

9.31 It is acknowledged that the site sits within the Metropolitan Green Belt. The Green Belt's five main purposes as outlined in the National Planning Policy Framework is; to check unrestricted sprawl, prevent towns from merging, safeguard the countryside from encroachment; preserve the setting and special character of historic towns and; to assist urban regeneration.

9.32 More recently, the term "grey belt" has been used to describe previously developed sites (brownfield) and poor-quality green belt areas.

9.33 The site currently sits directly on the border of the Green Belt (just within the boundary). The tyre and MOT garage immediately north of the site does not fall within the Green Belt. In addition to this the site is already used as a paved car park and coach set down area. The site currently benefits from floodlight spill and fencing.

- 9.34 Under the loose definition of the “grey belt”, the site at McGovern Park would arguably be considered to be grey belt land, considering the site is a brownfield site. Further to this, the proposed development is not materially changing the site much from the baseline conditions. The site will still be used for vehicle parking / charging, will have similar fencing to what is presently installed at the club and attempts have been made in the design to limit light and noise pollution.
- 9.35 In addition to the above considerations, the site is well screened from all directions including hedging along West End Road, built form to the north, the sports pitches to the east and further built form to the south. The proposed development would not have a significant visual impact upon the openness of the Metropolitan Green Belt.

The proposed development can safely demonstrate the following very special circumstances:

- The site is utilising brownfield land and is a very similar use to the current use at the site.
- The site currently has floodlights in the car park. The proposed lighting columns and luminaires have been designed to be dark sky compliant.
- The proposal is low in height and will be broadly screened from view from most directions, therefore having a limited impact upon the openness of the green belt.
- Darker colour fencing is proposed in green to assimilate vegetation colours, helping to lower prominence wherever possible.
- The EV hub will allow electric vehicles and plug-in hybrid vehicles to charge quickly in a location generally away from nearby residential dwellings to avoid any neighbour issues such as noise pollution, whilst being close enough to benefit local residents as a nearby facility that they can use.
- ESB source their electricity from suppliers who generate their electricity from 100% renewable energy sources, helping to not only improve the local environment by way of better air quality, but also by improving air pollution in the areas where the electricity is generated.
- The location of the site near the A40 means that much of the expected traffic visiting the site would not have to travel further north along West End Road into more central areas of Ruislip, potentially causing congestion.

- 10.36 The proposed development is considered to be supported by a clear set of Very Special Circumstances which, when taken together, clearly outweigh any harm to the Metropolitan Green Belt and any other potential harm arising from the proposal. The development would deliver strategically important electric vehicle charging infrastructure in a highly accessible location on the A40, a principal route linking West London with the M40 motorway and the wider strategic road network. Its proximity to Heathrow Airport further reinforces its suitability, providing convenient charging facilities for airport users, hire vehicles, taxis and long-distance travellers. The site is already influenced by significant transport infrastructure and an established urban context, including extensive hardstanding, an existing car park and surrounding commercial and transport-related uses, meaning the proposal would not encroach into open countryside or undermine the wider openness and purposes of the Green Belt to the same extent as development in a more rural location.

- 10.37 Furthermore, the proposal would make a meaningful contribution towards the transition to low-emission transport by supporting the uptake of electric vehicles and helping to address an identified need for publicly accessible rapid charging infrastructure. The provision of

reliable, strategically located charging facilities is essential to meeting national and local objectives for decarbonising transport, improving air quality and reducing greenhouse gas emissions. The proposed EV Hub would therefore deliver substantial public benefits, supporting sustainable travel on the strategic highway network whilst assisting in the delivery of the Government's net zero commitments. These significant environmental, economic and transport benefits are considered, both individually and cumulatively, to constitute the Very Special Circumstances necessary to justify the proposed development within the Metropolitan Green Belt.

10. Summary

- 10.1 Entrust Professional Services Ltd has prepared this Planning Statement in support of a full planning application submitted on behalf of ESB for the development of a publicly accessible ultra-rapid electric vehicle (EV) charging hub at McGovern Park, West End Road, Ruislip.
- 10.2 The proposal has been developed following detailed site assessment and technical evaluation, including consideration of transport, noise, biodiversity and planning policy. The supporting technical evidence demonstrates that the proposed development can be accommodated without giving rise to unacceptable impacts on neighbouring residential amenity, highway safety, ecology, heritage assets or the wider environment.
- 10.3 The proposed development makes effective use of an existing area of hardstanding within the McGovern Park car park, avoiding the loss of undeveloped Green Belt land and limiting any physical or visual change from the existing baseline. The scale of the development is modest, existing access arrangements are retained, and the proposal has been designed to minimise lighting, noise and visual impacts through careful siting, specification and operational design.
- 10.4 The proposal will deliver a strategically important piece of public infrastructure, providing ultra-rapid EV charging facilities on a key transport corridor adjacent to the A40 and within close proximity to Heathrow Airport. The location is well suited to serving both local users and longer-distance journeys, helping to address the growing demand for publicly accessible rapid charging infrastructure across West London.
- 10.5 The Planning Statement demonstrates that the proposal accords with the relevant provisions of the National Planning Policy Framework (2024), the London Plan (2021) and the Hillingdon Local Plan Part 2 (2020). In particular, the development supports national and local objectives relating to sustainable transport, decarbonisation, improved air quality and the transition to a low-carbon economy.
- 10.6 It is acknowledged that the site lies within the Metropolitan Green Belt. However, the proposal has been carefully designed to preserve openness as far as reasonably practicable and is located on previously developed land within an existing surfaced car park. The limited scale of development, together with the significant environmental, transport and public benefits arising from the provision of essential EV charging infrastructure, establish a compelling case that the identified Very Special Circumstances clearly outweigh any limited harm to the Green Belt and any other potential harm arising from the proposal.
- 10.7 Overall, the proposed EV charging hub represents sustainable development that will deliver substantial public benefits while avoiding unacceptable environmental or amenity impacts. The proposal is therefore considered to comply with the development plan when read as a

whole and with the material considerations set out within the National Planning Policy Framework. Accordingly, planning permission is respectfully sought.