Planning Statement

Land at 652 Victoria Road, Ruislip, London HA4 0LN

For Leap24 UK

Prepared by Gracechurch Town Planning Ltd

Gracechurch Town Planning Ltd is registered in England and Wales at Fifth Floor, 167-169 Great Portland Street, London, W1W 5PF, number 16299916.

TABLE OF CONTENTS

EXECUTIVE SUMMARY

1. On behalf of our client, Leap24 UK ("the applicant"), Gracechurch Town Planning has prepared this Planning Statement to support a full planning application submitted to the London Borough of Hillingdon Council ("the Council") in connection a proposal at Land at 652 Victoria Road, Ruislip, London HA4 0LN ("the site").

2. The site comprises land at a Shurgard Self Storage facility located off Victoria Road in Ruislip and is in an existing commercial use. The application seeks full planning permission for the use of site as an electric vehicle charging station, including the erection of one charging upstand, associated equipment and associated works.

3. The proposed development is wholly suitable in the context of an existing commercial site. There is an established need for new and expended electric vehicle charging facilities and in particular in locations that are not served by existing motorway / trunk road facilities. The policies of both London Plan and the Council's Local Plan are supportive of the provision of new electric vehicle charging infrastructure across the whole of Hillingdon.

4. There will be no change in the access arrangements for the site, and the proposal includes the provision of a new fully accessible wheelchair bay (where one does not currently exist); there will be no adverse impact on the local highway network as a result of the proposed development.

5. In the context of the existing commercial area the very modest equipment proposed in the form of the charging upstand and LV feeder pillar will have no material impact on the character of the streetscene and wider area; and there will be no other impacts with respect to residential amenity, arboriculture, flood risk, heritage or any other planning matters.

6. This Planning Statement along with the plans and supporting documents submitted with the application demonstrate that the proposed development will be in accordance with the development plan when taken as a whole, along with and national planning policy.

THE SITE

7. The site comprises land at a Shurgard Self Storage facility located off Victoria Road in Ruislip. The facility comprises the main self-storage building, 13 smaller units and a 'lighthouse' building' that serves as the office.

8. The area to be developed is a small parking forecourt immediately adjacent to the existing office lighthouse building which contains four parking bays, including an accessible bay. Figures 1 below is an image of the site:

Figure 1 – image of site (Source: Google Streetview)

9. Surrounding the site are commercial uses to the east and west, sport facilities to the north and the railway line to the south; there are no residential properties nearby.

10. The application site:

- is not within the Metropolitan Green Belt.
- is not part of the curtilage of a statutorily or locally listed building;
- is not in a conservation area;

- does not have any trees on it or adjacent to it that are subject to a Tree Preservation order (TPO); and
- not within an area designated for any specific land use in the Council's development plan.

11. The site is within flood zone 2 as designated by the Environment Agency.

THE APPLICANT AND THE PROPOSAL

The applicant

12. The applicant is Leap24 UK, who is a leading provider of sustainable transport infrastructure across North-West Europe, having considerable success in making the transition to clean mobility in Germany and the Netherlands.

13. Leap24 UK is continuously growing and developing to expand its delivery of electric vehicle charging stations whilst ensuring the provision of market-leading efficient, sustainable and user-friendly charging stations.

14. The Government's commitment to reducing greenhouse gas emissions has provided an opportunity for Leap24 UK to expand their success in Germany and the Netherlands to the UK, where they have begun acquiring sites to contribute towards the national requirement for easily accessible and spacious electric vehicle charging stations in the urban realm.

15. The innovative technology developed by Leap24 UK and delivered in each of its charging stations is suitable for a variety of electric vehicles. The fast-charging units have been designed in a modular and sustainable approach to enable the minimisation of waste in the construction and longer-term management processes, and each of the stations provide a comfortable and green environment to further encourage the shift to electric vehicles.

The proposal

16. This application seek permission to create a new high-quality electric vehicle charging station. One electric vehicle upstand will be erected which will serve two car parking bays.

17. To facilitate the development, the existing four spaces will be reorganised into three wider spaces, as shown on drawing ref. 110 Rev P1. The charging upstand will be located between the two northern spaces, which will each be 3.6 m wide. The third space will be a fully accessible bay (where one does not currently exist).

18. The following equipment is proposed:

- one Alpitronic Hypercharger HYC150 charging upstand, and this will serve both bays. The details of this are set out on plan re. 201 Rev P1; and
- one LV feeder pillar, and this will be located to the immediate north of the spaces. The details of this are set out on plan re. 202 Rev P1.

PLANNING ASSESSMENT

The Development Plan

19. The development plan comprises the Local Plan: Part 1 (2012), and the Local Plan Part 2 (2020) and the London Plan (2021).

Principle of development

20. In November 2020, the UK government announced as part of 'The Ten Point Plan for a Green Industrial Revolution' Policy Paper, a commitment to end the sale of all new petrol and diesel vehicles by 2030, and that all new cars and vans will be required to be fully zero emission at the tailpipe by 2035. The Automated and Electric Vehicles Act 2018 seeks to improve the network of charging points for electric vehicles to help deliver this objective.

21. A declaration was made as part of the 2021 United Nations Climate Change Conference (COP26) to accelerate the transition to 100% zero emission cars and vans. This sets out the government's commitment to working towards all sales of new cars and vans being zero emission by 2040 or earlier, or by no later than 2035 in leading markets. This declaration represents a landmark global agreement launched by the UK COP presidency to signal the end of polluting vehicles and will help to achieve the goals of the Paris Agreement (COP21).

22. In March 2022, the Government published the Taking Charge: The Electric Vehicle Infrastructure Strategy. This strategy sets out the government's vision and action plan for the rollout of electric vehicle charging infrastructure in the UK. This sets out a goal of providing around 300,000 public charging points as a minimum by 2030 and seeks to ensure these are installed ahead of demand, inspiring confidence in drivers who have not yet made the switch.

23. Based on the Government's latest data (online 'electric vehicle charging device statistics: April 2025), as of 1 April 2025, there were 76,507 public electric vehicle charging devices installed in the UK; this is 25.5% of the target. Of these, 15,446 were rated as rapid devices or above, meaning around 80% of the existing public changepoints available are ones where charging takes 3 hours or more.

24. The foreword from the then Secretary of State for Transport to the strategy sets out that the government's key points of the strategy, including that:

    - *Our plans will get more chargepoints in the ground, quicker. They will strengthen the business case for chargepoint operators to invest now at this*

early stage of the transition, and the speed at which they are connected to the electricity system will accelerate.

- *..not everyone has access to [private] off-street parking, so we will focus efforts on installing more on-street chargepoints, providing convenient and affordable charging, ideally on the street where you live. You'll see chargers integrated into lamp posts and next to parking bays, for example. Innovative solutions are being piloted up and down the country as I write.*
- *The private sector has a critical role to play in providing convenient, affordable and reliable charging for all. We are already seeing a proliferation of public chargepoints at supermarkets, gyms and tourist attractions, installed without Government support.*
- *Ultimately, charging your EV should be easier, cheaper and more convenient than refuelling a petrol or diesel car, wherever you live. At the same time, we must make sure that this revolution happens alongside growth in all other zero emission and low emission forms of travel, such as walking – so we are setting out clear principles to minimise pavement clutter, prevent trip hazards for pedestrians and stop new EV charging bays precluding bus and cycle lanes.*

25. The executive summary of the strategy goes on to say that the UK should be a place where:

> *Everyone can find and access reliable public chargepoints wherever they live – be that city centre or rural village, urban flat or suburban house, in the north, south, east or west of the country. Charging opportunities will not be limited by income or location.*
>
> *Effortless on and off-street charging for private and commercial drivers is the norm – easy overnight charging is, and will remain, the default for those with driveways. But charging should be just as convenient and stress-free for those who currently park on street. This must extend beyond privately owned cars; those who drive vans and commercial vehicles must also have access to chargepoints that meet their needs.*
>
> *Market-led rollout for the majority of chargepoints delivers a thriving charging sector – the sector is booming now with smart UK SMEs driving the pace of change and forcing big corporates to adapt. By 2030, this will represent a huge global opportunity for UK Plc. A thriving competitive market will help to drive down costs for consumers.*

26. The Mayor of London recognises in the London Plan that London must lead the way in tackling climate change by moving towards a zero-carbon city by 2050, with it highlighted at paragraph 1.6.2 that:

> *All cities must face up to the reality of climate change and the need to limit their future contribution to this major global problem. This London Plan will require developments to contribute towards London's ambitious target to become zero-carbon by 2050 by increasing energy efficiency, including through the use of smart technologies, and utilising low carbon energy sources.*

27. Policy T2 of the London Plan refers to the Mayor's Health Streets approach to, among other outcomes, reduce vehicle emissions. Paragraph 9.2.1 re-iterates this intention, stating that (***original emphasis***):

> *The Mayor is committed to London **becoming a zero-carbon city**. This will require reduction of all greenhouse gases, of which carbon dioxide is the most prominent.*

28. The London Plan expresses the clear intentions to reduce carbon emissions, with a major contributor being through use of smart and sustainable technologies. Electric vehicles provide a key technology that significantly reduces emissions generated by conventional petrol and diesel cars. Electric vehicle charging infrastructure as proposed additionally makes electric vehicles far more accessible to the wider public, who may not have the facilities for private charging.

29. Policy T6 part G of the London Plan requires that where car parking is provided in new developments, provision should be made for infrastructure for electric or other Ultra-Low Emission vehicles in line with additional London Plan policies for specific land uses. The proposed development would contribute a full provision of Ultra-Low Emission vehicles, therefore exceeding this policy, thereby considerably exceeding London Plan Policy T6's requirement.

30. The Council's Local Plan Part 1 sets out the strategic direction for the Borough. The foreword to the Local Plan Part 1 notes that the Council needs to *"…tackle the impact of climate change locally in the best way possible."* It goes onto set out that *"Improved environment and infrastructure is supporting healthier living and helping the borough to mitigate and adapt to climate change"* is part of the 'Vision for Hillingdon 2026'.

31. Strategic objective 11 of the Local Plan Part 1 seeks to address the impacts of climate change, and minimise emissions of carbon and local air quality pollutants

from new development and transport. Policy EM1 of the Local Plan Part 1 seeks to ensure that climate change mitigation is addressed at every stage of the development process.

32. Part A of Policy DMEI 2 of the Local Plan Part 2 requires all development to make the fullest contribution to minimising carbon dioxide emissions in accordance with London Plan targets. Policy DME14 of the Local Plan Part 2 seeks development proposals to demonstrate appropriate reductions in emissions to sustain compliance with and contribute towards meeting EU limit values and national air quality objectives for pollutants. Development is required to contribute toward the improvement of air quality. The Council has a clear intention of ensuring that development reduces carbon emissions and pollutants.

33. The Framework actively encourages new development to facilitate the use of sustainable transport modes, including zero emission vehicles to help support the transition to a low carbon economy. Paragraph 112(e) sets out that planning policies should take into account the need to ensure an adequate provision of spaces for charging plug-in and other ultra-low emission vehicles.

34. The proposed electric vehicle charging facility will therefore contribute towards the increasing objective of making electric vehicles more commonplace, thereby reducing vehicle emissions and assisting London – and more broadly the UK – to achieve its objective of becoming zero-carbon.

35. The Council is therefore clearly wholly supportive of the introduction of electric vehicle charging stations. The need for such facilities is clearly established, and the Council has set out strong support as part of its overriding spatial strategy and key planning policies.

36. Policy EM1 of the Local Plan Part 1 sets out that:

> *The Borough will ensure that climate change adaptation is addressed at every stage of the development process by…[g]iving preference to development of previously developed land to avoid the loss of further green areas.*

37. This reflects the Framework, which sets out at paragraph 124 that:

> *Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land.*

38. The site is previously developed land. The proposed development will be consistent with the Council's spatial strategy and the Framework by promoting development in a sustainable location on brownfield land.

39. The proposed development will make a valuable and important contribution towards the provision of electric vehicle charging point facilities in Hillingdon, serving both the customers of the existing commercial self-storage facility and allow for wider use of local businesses and residents. The facility will help support the transition to a low carbon economy in accordance with national infrastructure and planning policy and be wholly in accordance with the policies of the development plan.

Impact on the character of the area

40. Policy D3 of the London Plan specifies the need for new development to respect the character of the surrounding area whilst also making a positive contribution to the identity of a place. Policy BE1 of the Local Plan Part 1 requires development to achieve a high quality of design that respects the local character and landscape. Policy DMHB 12 of the Local Plan Part 2 additionally seeks to ensure design takes account of the established townscape character and quality of the surrounding area.

41. Section 12 of the Framework relates to design and states that the Government attaches great importance to the design of the built environment, with good design being a key aspect of sustainable development. Paragraph 134 refers to the importance of fitting in with the overall form and layout of the site's surroundings.

42. The site is in a wholly commercial location. The proposed charging upstand and associated equipment will not be prominent in the streetscene and will not detract from it. Rather, the proposed facility will assimilate into and be seen as a natural part of the commercial character of the area.

43. The proposed development is therefore wholly acceptable in this location in design terms as it will be appropriate to and complement the character of the area. The proposed development will therefore preserve the character of the area in accordance with Policy D3 of the London Plan and Policies BE1 and DMHB 12 of the Local Plan Parts 1 and 2 respectively, and the Framework.

Highway safety

44. Policy T4 of the London Plan requires development to fully assess the impacts on the capacity of the transport network, and mitigate adverse impacts if required. Policy DMT 1 of the Local Plan Part 2 requires development to maximise safe

accessibility to and from within the development and have no adverse transport impacts on the local and wider environment.

45. The Framework recognises that transport policies have an important role to play in facilitating sustainable development and states that 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. Paragraph 116 of the Framework states that developments should not be refused on transport grounds unless there would be an *unacceptable impact on highway safety*, or the residual cumulative impact of the development *are severe* (taking into account all reasonable future scenarios).

46. The use of two existing parking bays in connection with a single electric vehicle charging upstand will have no material impact with respect to highway safety. Ultimately, the main use of the parking bays will continue to be in connection with customers of the storage unit – the intention will be that customers with electric vehicles can charge these whilst accessing the storage unit. The chargers to be installed will be ultra-rapid 150kw+ which will allow for full charging in 10-20 minutes – and so consistent with the typical time a customer may be accessing the storage unit for.

47. However, it is the case that non-customers of the storage unit will have access to the parking bays (as there is no control on the access into the front of the site). Use of the bays for charging of vehicles by non-customers of the storage unit will not result in an unacceptable impact on highway safety because it will not materially increase the number of vehicle movements in and out of the site; and there will be no change to the access arrangements, allowing for vehicles to enter and exit the site safely as they do at the moment.

48. Were the self-storage unit to be given planning permission now, provision would have to be made for electric vehicle charging for staff and visitors.

49. It is therefore the case that the use for electric vehicle charging for both customers and non-customers of the storage unit will be appropriate in transport terms as it will not result in an unacceptable impact on highway safety and so be wholly in accordance with the requirements of the Framework.

50. The proposal therefore provides a safe and effective access for the electric vehicle charging bays, and therefore complies with the Framework, Policy T4 of the London Plan and Policy DMT 1 of the Local Plan Part 2.

Accessibility

51. The proposed new electric vehicle charging station will be accessible and inclusive to all electric vehicle users, complying wholly with PAS 1899:2002 Electric Vehicles – Accessible charging – Specification.

52. The proposed Alpitronic Hypercharger HYC150 will be positioned and oriented such that its components can be easily viewed, reached and operated from a seated or fully standing position, by providing adequate spacing in front of the points of access to the chargepoint components. The tethered charging cable connector handle will be approximately 1.0m above the adjacent ground, and the screen/visual interface will be 1.25m above the adjacent ground.

53. There will be no grass, mud or gravel materials surrounding the charger, and the material will be inspected and maintained on a regular basis to ensure no surface deformities that would inhibit wheelchair access will occur.

Other matters

54. The site is located in Flood Zone 2 as designated by the Environment Agency, and a medium risk for surface water flooding. The Council's validation checklist confirms that applications for change of use only require a Flood Risk Assessment where they are in Flood Zone 3 and the change is to a more vulnerable category. That is not the case here – the site is in zone 2, and the flood risk category is and will remain 'less vulnerable' (as per Annex 3 of the Framework).

55. With respect to the two existing trees that are located on the fontange to the site, these are not protected and the new LV feeder pillar will be located approximately 7.1m at its closest point (and the charging upstand further away). There is no change proposed to the hardsurfacing and so there will be no impact with respect to the root protection areas of the trees. On this basis, there will be no adverse impact on these trees.

56. There are no nearby residential occupiers that could be impacted, and similarly there are no designated or non-designated heritage assets near to the site.

57. The social, economic and environmental benefits of the proposal are clear and must be afforded significant weight. This position has been supported at appeal, including in connection with appeal decision ref. APP/Y9507/W/22/3308885 **(Appendix 1)** for a mixed-use development in the South Downs National Park, comprising a recharging centre for electric vehicles and tourist accommodation.

Paragraphs 61 and 62 of the Inspector's Decision Letter sets out that (emphasis added):

> *61 …**there is a national, regional and local need for a huge roll out of Electric Vehicle Charging Points (EVCPs) in appropriate locations as EV take up increases.** The Government has legislated to prevent the sale of new petrol and diesel vehicles from 2030 and is actively encouraging the uptake of electric vehicles, whilst noting that the infrastructure necessary to support them is not currently in place. **This infrastructure must be facilitated and will be required on a significant scale if a cultural shift is to be achieved.***
>
> *62 **The NP [South Downs National Park] is not exempt from this need and the delivery of a significant number of EVCPs alongside the very busy A3 trunk road is very beneficial, even bearing in mind the potential for charging in other locations such as at home or workplace.** It is not realistic to expect that existing fuel forecourts or service stations will convert from petrol and diesel at any scale whilst combustion engines remain predominant and **so delivery of bespoke provision is likely to be part of the solution. In short, the country, and the NP in particular, is nowhere near the threshold of EVCP provision where it can be argued that there is no demonstrable need for more.***

58. Despite the level of protection afforded to the appeal site by virtue of its location within a National Park (i.e. one of the most protected sites in planning terms), the Inspector still judged these benefits to outweigh the visual harm and landscape impacts caused by the development. This proposal should also be assessed in the same context.

CONCLUSION AND NEXT STEPS

59. The assessment set out above along with the plans and supporting documents submitted with the application demonstrate that the proposed development will be in accordance with the development plan when taken as a whole, along with and national planning policy. Furthermore, when exercising the overall planning balance, there are material planning considerations that weigh in favour of the proposal and give further support to the position that planning permission should be granted.

60. We respectfully request that the Council grants the full planning permission sought at the earliest opportunity.