

Hatton Cross Car Park

Planning and Design & Access Statement

**Planning application for the installation of EV parking
and charging facilities with associated infrastructure at
Hatton Cross car park**

Fast Places Limited

23 January 2025

LICHFIELDS

69611/07/HS/HS
33347897v3

Contents

1.0	Introduction	1
	The Planning Application Submission	1
	Statement Structure	2
2.0	Background	3
	Applicant	3
	About Places for London	3
	About Fastned	3
	EV Charging	4
3.0	Site and Surrounding Area	6
	The Site	6
4.0	Proposed Development	8
	Electric Vehicle Charging	8
	Access and Wayfinding	8
	Toilet Facility	9
	Signage	9
	Lighting	9
	Landscaping	9
	Transport for London's Car Park Alteration Works	9
5.0	Planning Policy Context	11
	Statutory Development Plan	11
	Other Material Considerations	13
6.0	Planning Policy Analysis and Design Considerations	16
	Principle of Development	16
	Transport	17
	Design and Access	18
	Archaeology	19
	Biodiversity Net Gain	19

7.0 Conclusion

21

1.0 Introduction

- 1.1 This Planning, Design and Access Statement has been prepared by Lichfields on behalf of the applicant, Fast Places Limited (the “Applicant”) to accompany a full planning application for the provision of 12no. electric vehicle (EV) charging points, covering canopy, a toilet facility, and associated works (“the development”) at Hatton Cross Station Car Park, Great South-West Road, Longford, Hounslow, TW14 0PR (“the site”).
- 1.2 The Applicant is a new joint venture partnership between Places for London (Transport for London’s (“TfL”) property company) and Fastned, an award-winning Electric Vehicle (EV) ultra-rapid charging company. The partnership has been established to assist with the delivery of multiple charging hubs across TfL’s estate, building on the capital’s electric vehicle charging facilities to transform availability and accessibility of this essential infrastructure.
- 1.3 The application proposals which are the subject of this submission represent the initial output of this joint venture, and the first development in a number of planned charging hubs across London. Adopting the latest in technology, each hub will create new dedicated off-street urban charging capacity at a convenient and accessible location. Combined, it is anticipated that the charging hubs will further enable the capitals’ ongoing switch to EVs, and with it, make a significant contribution towards achieving the transition to Net Zero carbon.

The Planning Application Submission

- 1.4 This Statement, which assesses the scheme against the context of prevailing planning policy and guidance, should be read in conjunction with the other documents that have been submitted with the planning application, including:
- 1 Planning application form;
 - 2 Covering letter (prepared by Lichfields);
 - 3 Transport Statement (prepared by i-Transport);
 - 4 Archaeological Desk Based Assessment (prepared by Lichfields);
 - 5 Planning application drawings (prepared by Fastned):
 - i Location Plan (44125_P_100);
 - ii Proposed Block Plan (44125_P_106);
 - iii Proposed Toilet Unit Plan, Elevation & Sections (44125_P_105);
 - iv Proposed Elevations (44125_P_200);
 - v Proposed Charging Units (44125_P_205);
 - vi Existing Surface Car Park Plan (44125_P_101);
 - vii Existing Surface Car Park Alteration (44125_P_102);
 - viii Proposed Ground Level Plan (44125_P_103);

- ix Proposed Canopy Level Plan (44125_P_104);
- x Proposed Utilities Plan (44125_P_302).

Statement Structure

- 1.5 This Statement, which initially provides an account of the proposed development prior to undertaking an assessment of the scheme against prevailing policy, is structured as follows:
- 1 Section 2 provides a brief background to Fast Places Limited, explaining the nature of the relationship between Places for London and Fastned, and their combined ambitions regarding the improvements to EV charging infrastructure provision across London;
 - 2 Section 3 provides details the nature of the application site and surrounding area;
 - 3 Section 4 describes the proposals, explaining both the nature and operation of the EV charging hub facility;
 - 4 Section 5 reviews the relevant national, regional and local planning policy, providing a summary of key policy requirements relevant to the consideration of the application proposals;
 - 5 Section 6 assesses the scheme against the identified key policy considerations, including an assessment of the design and access matters; and
 - 6 Section 7 provides a conclusion to this Statement.

2.0 **Background**

Applicant

- 2.1 As referenced above, the applicant is Fast Places Limited, a joint venture between Fastned and Places for London. Fast Places is investing in EV charging facilities across London, with a roll-out of new charging hubs programmed for 2025 and beyond. The Hatton Cross car park proposals, which are the subject of this application, are the first of five initial projects, each designed to add to the portfolio of EV charging hubs serving the capital. Additional sites are planned beyond this initial tranche, with the ambition to transform the availability of modern, safe, and attractive EV charging facilities for Londoners.

About Places for London

- 2.2 Places for London is TfL's wholly owned property company, responsible for the management of TfL's property portfolio that extends to over 2200 hectares of land across the capital. Uniquely placed to deliver on an ambition to untap the potential of its land assets for the betterment of Londoners, through investment in its portfolio, Places for London is building a greener, more sustainable city.
- 2.3 Places for London has ambitious plans to build 20,000 new homes over the next 10 years, supporting new sustainable housing projects that create attractive new homes in beautiful environments. Its ambitions extend to the business sector, with plans to supplement its existing portfolio through the creation of more spaces for all of London's businesses to thrive. Alongside this, through refurbishment of its existing stock of property and land, it is aiming to deliver up to 3 million sqft of sustainable, flexible and connected office space to help serve London's growing needs.
- 2.4 Places for London is also the custodian of traditional infrastructure, such as car parks and unused land across London. In such locations, it retains an ambition to ensure each site taps its full potential to sustainably contribute towards London's needs. Its partnership with Fastned and the current and emerging proposals to deliver on sustainable transport infrastructure at such sites is consistent with its long-term vision for such locations.

About Fastned

- 2.5 Established in 2012, Fastned is a developer and operator of EV charging infrastructure. It already operates a fast-charging network across the UK, Netherlands, France, Germany, Belgium, Denmark, Italy, Spain and Switzerland. Fastned has circa 315 charging stations across its growing network, including over 100 such facilities in the UK. Fastned is at the forefront of European charging infrastructure development, building and running a rapidly growing network of fast charging stations, instantly recognisable by the iconic architectural designs of each hub facility.
- 2.6 Fastned provides easy to use, ultra-rapid charging stations, adopting the latest in technology to ensure the quickest charging experience. Fastned creates charging stations with a welcoming environment for users during the 45 minutes it takes to fully charge up their vehicles (with a 20-minute stop sufficient in most cases to enable a 300-mile top-up). Covered spaces, well-lit and secure, with generous manoeuvring space and on-site facilities

(including toilets for site users), all ensure that each visit is simple, stress-free and enjoyable.

- 2.7 The quality of service offered at Fastned facilities is best reflected in the number of awards it has secured. Just last year, it was successful in the eMobility Innovation Awards (winning the best innovative project for the future of mobility); the Zapmap Best EV Charging Network (Medium rapid/ultra-rapid network) award (particularly noteworthy given that the award was the product of EV driver responses to a satisfaction survey where Fastned topped the rankings with a 4.1 star score); and the prestigious What Car report, that ranked Fastned as the No.1 ranking UK charging network.
- 2.8 Fastned is expanding its portfolio of charging stations across the UK, and through its link up with Places for London, is seeking to become a familiar feature on London's roads, providing essential reassurance to the capital's EV users. Through a step-change in both the quality and availability of hub charging infrastructure across London, Fastned is hoping to inspire a real and impactful switch to EVs.

EV Charging

- 2.9 There is an acute need for the provision of additional EV charging infrastructure both across the UK and within London, specifically. The availability of sufficient EV charging capacity represents an essential prerequisite for the desired switch to EV vehicle use, an ambition that underpins this Government's green policy ambition for transport (NPPF, 2024). A transformation in the supply of EV charging facilities, and in particular the availability of convenient ultra-fast vehicle charging, is essential to enable the continued growth in EV use, that itself is vital for the successful transition of the UK towards a net zero economy.
- 2.10 In terms of the current use of EVs within the UK, Zapmap (December, 2024)¹ recorded that there *"are over 1,360,000 fully electric cars in the UK. This means that around 4.01% of the c.34 million cars on UK roads are fully electric"*. Furthermore, since 2020, the number of electric cars on the UK roads has increased *"more than six-fold"* (0.06% (2020) > 4.01% (2024)). The number of EVs on London roads is expected to rise to between 0.3 and 0.6 million by 2025, rising further to between 1 to 1.4mn by 2030.² Car manufactures in the UK are responding to the accelerated trajectory of EV car use, with *"more than two-thirds of car manufacturers in the UK, including Nissan and Stellantis, have already committed to fully transitioning to electric cars by 2030."* (UK Government, Press Release, December 2024)³.
- 2.11 However, the availability of charging facilities has not kept pace with this growth and is threatening to prejudice a greater reliance on EVs. In March 2022, in its document *"Taking charge: the electric vehicle infrastructure strategy"*, the previous Government identified a current supply of around 30,000 public charging devices at locations such as car parks, workspaces, on-street locations and train stations etc. Of this, only 2,011 rapid or high-powered devices located on the strategic road network were identified. In this same document, the Government was calling for the provision of at least 300,000 public charge points (as a minimum) by 2030, to service the anticipated 10 million battery electric

¹ <https://www.zap-map.com/ev-stats/ev-market>, 2024.

² <https://rurc.content.tfl.gov.uk/london-2030-electric-vehicle-infrastructure-strategy-executive-summary-december-2021.pdf>

³ <https://www.gov.uk/government/news/industry-encouraged-to-shape-uk-transition-to-zero-emission>, 2024.

vehicles that will be on the UK's roads at this time. Whilst this target is some five years distant, it is already evident that there is a need for a transformation in the speed of delivery of new EV charging facilities, if the Government's ambitions regarding infrastructure provision are to in any way realised.

- 2.12 Charging availability is more than just an inconvenience. One in a number of studies, the Versinetic Report (Charging on the Go: UK Public EV Infrastructure & Payment Systems, September 2024)" noted that "35.9% of EV drivers need help finding available chargers, **which is a crucial factor hindering the adoption and convenience of EVs**". (Our emphasis). A failure to increase the availability of charging facilities, therefore, represents a real deterrent to a higher take up of EV use.
- 2.13 This need to expand the availability of charging infrastructure has not gone unrecognised, both with regard to the Government's agenda referenced above, but also in prevailing policy. Section 5.0 of this Statement identifies the strong in-principle policy support behind the creation of new charging infrastructure.
- 2.14 For the capital, the Mayor of London's commitment pledged in April 2024 to making London 'greener', included an acknowledgement that towards 40,000 new EV charging points would be required by 2030⁴. This followed a London Electric Vehicle Infrastructure Delivery Plan published in June 2019 where the Mayor set out his vision for zero emission transport in London by 2050. The Mayor's ambition is to work towards all cars and vans registered in London to be zero emission by 2030 and through an Electric Vehicle Infrastructure Taskforce, EV charging infrastructure will be expanded to support this.
- 2.15 At the local level Hillingdon's Council's Climate Action Plan introduced the Electric Vehicle Infrastructure Strategy (2023) which defines plans to deliver hundreds of charging points in the Borough by 2030. Section 5 provides more detail on this.
- 2.16 This application proposals, and the wider ambitions of the applicant to roll-out new EV charging hubs across TfL's property portfolio, creates an opportunity to begin to meet the growing demand for this essential infrastructure, creating attractive high-quality, reliable and convenient facilities, essential to support the planned (and necessary) increased reliance on EVs.

⁴ <https://sadiq.london/wp-content/uploads/2024/04/A-Fairer-Safer-Greener-London-for-everyone-Manifesto-2024.pdf>

3.0 **Site and Surrounding Area**

The Site

- 3.1 The application site is the existing Hatton Cross Station car park. It sits to the south of the Southern Perimeter Road and north of the Great South-West Road (A30) which provides access to nearby employment and residential areas, and the M25 beyond. The area immediately surrounding the site is predominantly industrial in nature, with Heathrow Airport sitting directly west.
- 3.2 The existing car park is formed of 106 spaces and serves users of Hatton Cross Station. Access is taken directly from the A30 in the form of a left-in left out arrangement. There is also an additional access from the Southern Perimeter Road in the form of a left-in slip, but this is temporarily blocked and not in current use. There is also an informal drop-off area located within the car park adjacent to the Station entrance.
- 3.3 Car park usage data provided by TfL (covering the period 1st April 2024 – 11th November 2024) is assessed in detail within the submitted Transport Statement. This data provides an account of the number of vehicles paying for parking over four-weekly periods, from which daily usage can be calculated (the charging regime which applies a daily charge for all vehicles would suggest that most vehicles are using the car park for the day, rather than short visits). The Transport Statement's analysis suggests the current average daily usage of the car park is approximately 84 vehicles, creating an average number of spare car parking spaces daily at around 22 spaces.
- 3.4 This data does not pick up on the vehicles using the existing ad hoc drop Station off area in the car park, but it is noted that planned installation of Automatic Numberplate Recognition (ANPR) facilities at the car park (separate and unrelated to this application submission) will reduce such drop offs and associated traffic movements in the future.

Heritage & Archaeology

- 3.5 There are no listed buildings on or near the site and the site is not in a Conservation Area. The nearest designated heritage asset is the Grade II Listed Green Man Public House located circa 420m south east of the site.
- 3.6 The site is in an Archaeological Priority Zone. As such, an Archaeological Desk Based Assessment has been submitted to accompany the application and the findings of this assessment are reported below, within the context of relevant policy.

Flood Risk

- 3.7 The site is in Flood Zone 1, which is the zone with the lowest probability of flooding, ensuring this issue is not a relevant consideration for the application proposals.

Planning History

- 3.8 A review of London Borough of Hillingdon's (LBH) planning register identifies that a Certificate of Lawful Use of Development (CLOPUD) application was submitted in March 2024 (ref. no. 49133/APP/2024/539) for the installation of six EV charging bays including

associated charging stands at the Hatton Cross car park. The CLOPUD was granted on 23rd April 2024.

- 3.9 It is the case that certain types of EV charging infrastructure benefit from permitted development rights (as defined by the Town and Country Planning (General Permitted Development) (England) Order (2015) (as amended). Part 2, Class E and F identify both electrical outlets and upstands that could be installed without the need to secure separate planning permission for these works, and the submitted CLOPUD confirms that such development promoted at the site would fall into this category. Hence it would be possible to undertake some of the proposed works at the site without the need for any planning permission.
- 3.10 However, whilst this useful context for the current proposals, it is the ambition of the applicant to create an exemplary EV charging hub at the site that focusses on the user experience. Fast Places Limited is proposing a facility that is attractive, convenient and accessible for all, and includes associated services for its customers. This ensures that the nature of the proposed development extends beyond that allowable as permitted development. Hence whilst the CLOPUD establishes the ability to install EV facilities at the site, it does not enable the provision of the full suite of equipment and services proposed as part of a Fast Places Limited EV charging hub. Hence there remains a requirement to secure planning permission for the proposed development.

4.0 **Proposed Development**

4.1 The description of development for the full planning application is as follows:

“Application for 12 electric vehicle charging points, covering canopy, toilet facility, and associated works.”

Electric Vehicle Charging

4.2 This application proposes the creation of 12No. EV charging spaces. Six chargers will be installed, each hosting two charging points. The EV spaces will be covered by a 6.1m high and 22.9m wide yellow canopy structure. The canopy will include downward facing lighting, illuminating the charging area for users. It will be made of glulam timber columns and cantilever beams on the underside and steel framing overlaid on the upside; these features are separated by solar glass with integrated photovoltaic solar cell array. The proposed canopy design is a feature of Fastned’s EV charging sites across Europe.

4.3 The operation of the hub will be similar to a petrol station, working on a first come, first serve basis model. Fastned chargers are ultra rapid; the proposed chargers will provide a full charge within 45 minutes of use. Vehicles using the EV charging can park at the spaces for a maximum of one hour, allowing for a full charge and a 15 minute grace period. Note that Fastned offers a popular app for mobile devices that enables its customers to find the nearest charging location anywhere in the UK and Europe (which includes other providers); to understand what charging speed to expect at each location; and enables quick and efficient one tap digital payment. Importantly, it also offers users the ability to check availability of chargers, thus reducing the likelihood of vehicles waiting for spaces to become available, assisting with the site’s efficient operation.

Electricity Substation

4.4 To facilitate the electric charging on the site a small electricity substation is required. The substation will be housed in Glass Reinforced Plastic (GRP) and will sit alongside a Low Voltage and meter cabinet. The substation will be enclosed by 2.4m high fencing with access (noting that occasional access will be required for maintenance). Both the substation and LV cabinet will sit in dark green casing.

Access and Wayfinding

4.5 Access to the site via A30 remains unchanged by this application and will continue to operate as a left-in left-out arrangement.

4.6 It is proposed that the existing (but currently closed) access to the car park off Southern Perimeter Road will be reopened, allowing more convenient access to the site for potential customers looking to use the hub. It is noted that this existing access point benefits from a dedicated slip lane into the car park, allowing vehicles to slow before entering the site, without impacting upon traffic flows along the Southern Perimeter Road. It is not proposed to alter this existing arrangement, other than to re-open this entry point.

4.7 Changes are proposed to the site layout to enable safe pedestrian movement. Indicative walking routes and crossing points are proposed to facilitate access to the toilet and Station,

acknowledging the potential for users of the charging facilities to move around the site whilst their vehicles are charging. Existing users of the car park already walk across the site from spaces to the Station entrance (typically) and it is envisaged that the new routes created will also enhance safety for these users.

Toilet Facility

- 4.8 The proposal includes the provision of a toilet facility, designed for full disabled access, for use by FastPlaces customers. The toilet is self-cleaning and anticipated only occasional maintenance will be required. The facility will be 2.6m tall and 3.8m wide. A green wall is proposed on three of the toilet block elevations.

Signage

- 4.9 The proposals will include appropriate signage, to advertise the on-site facilities and indicative proposals are shown on the submitted application drawings. The full details of this signage has yet to be prepared and as a consequence, it is acknowledged that a separate advertisement consent will be required in due course.

Lighting

- 4.10 Lighting proposed at the site is located on the lower side of the canopy cover. Downward-facing LED strip lighting is to be integrated in the yellow perimeter framing to illuminate the charging area. LED lights are also proposed in the solar glass.
- 4.11 The site's existing lighting (on lighting columns around the car park) will remain unchanged as a result of the proposals.

Landscaping

- 4.12 The proposals include soft landscaping provided in two areas, the first adjacent to the proposed substation and the second adjacent to the toilet block, introducing an element of urban greening to the site that currently has no such features. As referenced above, the toilet will incorporate green walls.

CCTV

- 4.13 Two CCTV cameras and poles are proposed at the site, providing site surveillance over the vehicle charging areas, as appropriate.

Transport for London's Car Park Alteration Works

- 4.14 Separate to this development proposal and outside the scope of the application, TfL is proposing to make minor alterations to the A30 Great West Road access in and out of the site. TfL propose to reduce the size of the separation island between the entry and exit points and install a barrier between them. Removal of some of the cobbled islands close to the access is also proposed.
- 4.15 Full details of these proposals are set out within the Transport Statement, including the provision of swept path analysis of these new arrangements. However, other than noting

that these improvements are planned in the near future, they are not part of this application proposal, noting the adequacy of existing access arrangements.

5.0 **Planning Policy Context**

- 5.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires the determination of planning applications to be made in accordance with the relevant Development Plan unless material considerations indicate otherwise. Compliance with prevailing planning policy, therefore, will be key to the successful outcome of any planning application.

Statutory Development Plan

- 5.2 The Development Plan relevant for the site comprises:

- 1 London Plan (adopted 2021);
- 2 Hillingdon Local Plan Part 1 (adopted 2012)- Strategic Policies; and
- 3 Hillingdon Local Plan Part 2 (adopted 2020)- Development Management Policies and Site Allocations.

Emerging Plan

- 5.3 The LBH is currently reviewing its Local Plan, having undertaken a regulation 18 consultation from April 2024 to June 2024. However, this represents a very early stage in the plan preparation process and until this Plan progresses, it should carry very limited weight in the determination of an application, and as such it is not considered further in this policy review.

London Plan (adopted 2021)

- 5.4 The following London Plan policies are considered relevant to the determination of this application:
- a Policy GG2 Making the best use of land : Proposals should enable the development of brownfield land, and, prioritise sites which are well-connected by existing or planned public transport;
 - b Policy D3 The Design-Led Approach: Requires developments to provide a high-quality design response that optimises the capacity of sites through a design-led approach. The Policy sets out considerations that development proposals must take into account, such as form and layout, character, experience, amenity, landscape/spaces and quality.
 - c Policy D4 Delivering good design: Design and Access Statements submitted with the applications should demonstrate the proposal meets the design requirements of the London Plan.
 - d Policy D5 Inclusive design: Development should achieve the highest standards of accessible and inclusive design and should, inter alia, be able to be entered, used and exited safely.
 - e Policy G6 Biodiversity and access to nature: Development proposals should manage impacts on biodiversity and aim to secure net biodiversity gain. This

should be informed by the best available ecological information and addressed from the start of the development process.

- f Policy HC1 Heritage conservation and growth: Development proposals affecting heritage assets and their setting should conserve their significance and show appreciation within their surroundings. Development should avoid harm and identify enhancement opportunities by integrating heritage considerations early in the design process.
- g Policy T1 Strategic approach to transport: Policy promotes connectivity and accessibility via sustainable modes of travel.
- h Policy T4 Assessing and mitigating transport impacts: Development proposals should ensure that impacts on transport capacity and the transport network are fully assessed with development proposals not adversely affecting safety on the transport network. Any impacts on transport network capacity are to be assessed at the local, network-wide, and strategic level through Transport Assessments and Travel Plans.
- i Policy T6 Car Parking: Provision should be made for infrastructure for electronic and other ultra low emission vehicles.

Hillingdon Local Plan Part 1 (adopted 2012)- Strategic Policies

5.5 The following LBH strategic policies are considered relevant to the determination of this application:

- a Policy HE1: Heritage: The Council will conserve and enhance the setting of designated and non-designated heritage assets.
- b Policy BE1: Built Environment: Requires all new development to improve and maintain the quality of the built environment in order to create successful and sustainable neighbourhoods.
- c Policy EM7: Biodiversity and Geological Conservation: Policy encourages: - The provision of biodiversity improvements from all development, where feasible

Hillingdon Local Plan Part 2 (adopted 2020)- Development Management Policies and Site Allocations

5.6 The following LBH development management policies are considered relevant to the determination of this application:

- a Policy DMT1: Managing transport impacts: Development proposals will be required to meet the transport needs of the development and address its transport impacts in a sustainable manner.
- b Policy DMT2: Highways impacts: Development proposals must be compatible with the safe and efficient movement of the highway and not contribute to the deterioration of the local environment (air quality, noise or local amenity).
- c Policy DMHB1: Heritage Assets: Development proposals are expected to avoid harm to the historic environment. If development is expected to have an effect on heritage assets, it must not outweigh harm or loss and have a positive contribution to the local character.

- d Policy DMHB11: Design of New Development: Policy requires all development to be designed to the highest standards and incorporate principles of good design.
- e Policy DMHB14: Trees and Landscaping: All development will be expected to retain or enhance existing landscaping, trees, biodiversity or other natural features of merit. Development proposals will be required to provide a landscape scheme that includes hard and soft landscaping appropriate to the character of the area, which supports and enhances biodiversity and enhances amenity particularly in areas deficient in green infrastructure.
- f Policy DMEI 7: Biodiversity Protection and Enhancement: The design and layout of new development should retain and enhance any significant existing features of biodiversity value within the site. Where loss of a significant existing feature of biodiversity is unavoidable, replacement features of equivalent biodiversity value should be provided on site.

Other Material Considerations

London Borough of Hillingdon – Strategic Climate Action Plan (2021)

- 5.7 The Borough’s vision is set out in six climate commitments. The first commitment involves leading and inspiring residents to reduce their own carbon emissions, and creating the infrastructure for charging EVs.
- 5.8 The document includes eight strategic objectives, including Sustainable Transportation (Theme 8). C8.6 seeks to develop an EV charging action plan to commit to increasing the availability of EV charging points across the Borough. Theme 8 confirms that residents have asked for better EV charging infrastructure.
- 5.9 EVs are acknowledged as delivering a major benefit in tackling emissions that impact local air quality and climate change (Theme 8).

National Planning Policy Framework (2024)

- 5.10 The recent NPPF issued in December 2024, consistent with earlier iterations of this document, remains based on a presumption in favour of sustainable development, encouraging a sustainable approach to both planning policy and planning decisions. With regard to transport, Section 9.0 is titled ‘Promoting Sustainable Transport’ with the opening paragraph (para. 109) emphasising a need to realise opportunities for transport infrastructure and changing transport technology and usage. Paragraph 111 goes further, requiring polices to identify and protect sites which could widen transport choices, and with regard to parking, authorities are required to ensure adequate provision of spaces for charging plug-in and ultra-low emission vehicles (para 112).
- 5.11 Section 14.0 of the NFFP details the Government’s commitment to meeting the challenge of climate change. Paragraph 161 reiterates its ambition to achieve net zero by 2050, requiring the planning system to help to shape places in ways that contribute to reductions in greenhouse gas emission and support low carbon energy and associated infrastructure.

Decarbonising Transport: A Better, Greener Britain (2021)

- 5.12 Although published by the previous Government, this document has set the pathway for delivery of a greener transport system that remains relevant today. Part 2 of the Plan deals with zero emission cars. The document confirmed the Government's commitment to the phasing out of the sale of new petrol cars, identifying a programme to end sales in 2030. It also called for all new cars to be zero emission at the tailpipe by 2035. Acknowledging the link between EV use and the need for back-up infrastructure, the document included a commitment to ensure UK's charging infrastructure meets the demands of its users.
- 5.13 These targets on new car production are now the subject of consultation (see below) following concerns raised by the motor industry, as the new Government seeks to manage the transition to EVs, but the emphasis of policy to deliver a cleaner transport system and the critical role of EVs in enabling this transition remain key Government priorities.

Taking charge: the electric vehicle infrastructure strategy (2022)

- 5.14 This Government document followed on from the above, presenting a strategy for the creation of a "*robust, fair and scalable charging network covering the entire country*" (Secretary of State for Transport Forward, page 2.) It continued, noting that "*A world-class charging infrastructure is absolutely fundamental to delivering net zero road transport*" (page 4). The document's vision recognises that the transition to more EVs will require the charging market to evolve to meet increasingly diverse charging needs. Rapid progress across this market will be needed to keep on top of demand and deliver the vision of charging infrastructure that works for everyone, wherever they live, work and travel (page 48).
- 5.15 As referenced above, the document identified a current supply (March 2022) of around 30,000 public charging devices at locations such as car parks, workspaces, on-street locations and train stations etc. The document called for the provision of at least 300,000 public charge points (as a minimum) by 2030, to service the anticipated 10 million battery electric vehicles that will be on the UK's roads at this time.

Phasing out sales of new petrol and diesel cars from 2030 and supporting the ZEV transition: Government Consultation

- 5.16 The new Government has launched what it describes as a consultation that is largely technical in nature, concerning what sort of vehicles should be allowed for sale in the 2030-2035 period, seeking views on potential adjustments to the "*UK's largest carbon saving measure*" (Ministerial Forward). The consultation document makes it clear that the Government is committed to supporting the transition to zero emissions vehicles, noting that it is critical for tackling climate change (Paras 1 and 4). The consultation is focussed on the mechanisms to how best achieve the switch to EVs, rather than an in principle change in priority. In contrast, it reiterates the new Government's commitment to EVs as an integral component of its net zero strategy.

Key Policy Considerations

- 5.17 There are several consistent policy themes within the various development plan documents and other relevant policy guidance documents. Together, they combine to form a policy

framework for assessing the application’s ability to comply with the policy requirements. The key policy considerations for assessing the application are set out within the table below and will be assessed in turn under section 6.0.

Policy Theme	Policy Source (LP = London Plan) (LBH= London Borough of Hillingdon)
Principle of development	<p>LP T3 (Transport Capacity Connectivity and Safeguarding), LP T6 (Car parking) and LP GG2 (Making the best use of land).</p> <p>LBH DMT6 (Parking) and LBH T1 (Accessible Local Destinations).</p> <p>London Borough of Hillingdon – Strategic Climate Action Plan (2021). Taking charge: the electric vehicle infrastructure strategy (2022). Decarbonising Transport: A Better, Greener Britain (2021).</p>
Transport	<p>LP T1 (Transport), LP T4 (Assessing and mitigating transport impacts), and LP GG2 (making best-use of land).</p> <p>LBH DMT1 (Transport impacts), LBH DMT2 (Highway Impacts), and LBH DMT6 (Parking).</p>
Design and Access	<p>LP D3 (Design-led), LP D4 (Delivering good design), D5 (inclusive design), LBH DMT1 (Transport impacts, BE1 (Built environment), and DMHB 11 (Design).</p>
Archaeology	<p>LP HC1 (Heritage Conservation and Growth).</p> <p>LBH DMHB 7 (Archaeological Priority Areas and Archaeological Priority Zones), and LBH Policy HE1 (Heritage).</p>
Biodiversity Net Gain	<p>LP G6 (Biodiversity and access to nature).</p> <p>LBH BE1 (Built environment), LBH EM7 (Biodiversity), LBH DMHB14 (Trees and landscaping), and LBH DMEI 7(Biodiversity Protection and Enhancement).</p>

6.0 **Planning Policy Analysis and Design Considerations**

Principle of Development

- 6.1 There is strong policy support for the development of EV charging facilities at the Hatton Cross site.
- 6.2 There is an acute need to provide new EV charging infrastructure to support the continued switch to EVs. There is agreement that a failure to match the provision of charging infrastructure to demand will curtail the further growth in the use of EVs, which is recognised by Government (and others) as an essential component of achieving net zero (see Taking Charge: the electric vehicle infrastructure strategy (2022) as an example).
- 6.3 The previous Government recognised that there was a requirement to provide a ten-fold increase in the availability of EV chargers (with a particular priority for fast charging) if the UK was to have sufficient capacity to accommodate the predicted level of EVs on the country's roads in 2030. Whilst the Government has changed, the ambitions in respect of the growth in EV use remain, and it is evident that EV charging capacity needs to be transformed if ambitious targets for EV use are to be achieved.
- 6.4 At the regional level, consistent with this theme, the Mayor of London as identified a need for 40,000 additional chargers across the capital, again by 2030. It is appreciated that EVs play a pivotal role in delivering on the capital's green agenda, and achieving more EV use is only practical in the event of much greater availability of charging infrastructure.
- 6.5 The recognised need for more charging capacity has been translated into policy at national regional and local level. London Plan Policy T3 (Transport Capacity), endorses the provision electric vehicle charging infrastructure. London Plan policy T6 (Car Parking) (specifically Policy T6.1, T6.2, T6 .3 and Policy T6 .4) encourages the provision of electric or other ultra- low Emission vehicles parking within new development, with a strong emphasis on the provision of more EV spaces across London. Supporting text within LBH's Part 1 paragraph 9.14 of policy T1 (Accessible Local Destinations) and Part 2 paragraph 8.31 of Policy DMT 6 (Vehicle Parking) reiterate the London Plan's position, endorsing the installation of electric vehicle parking within the Borough.
- 6.6 This specific policy endorsement for the proposed scheme is before any consideration is given to the more general policy support that seeks to promote sustainable development. LBH's Strategic Climate Action Plan (2021) creates a positive context for proposals that embrace sustainable development principles (whilst also championing the increased availability of EV charging points across the Borough). At a national level, the recent NPPF is based upon a presumption in favour of sustainable development, again with more specific encouragement for proposals that deliver sustainable transport infrastructure – parking standards are required to ensure adequate provision of charging facilities. The previous Government's Strategy Documents (Taking Charge: The Electric Vehicle Infrastructure Strategy (2022) and Decarbonising Transport: A Better, Greener Britain (2021)) identify the pathway towards the end of a reliance on petrol cars, identifying the central role of new EV charging infrastructure in achieving this ambition. Whilst the new Government is consulting on changes to specific targets in this regard, there is no suggestion that its

support for new EV charging infrastructure is changing – it is the failure in current EV charging capacity to keep up with demand, and concerns about under provision in the future that is necessitating the new consultation. The need for, and importance of more EV charging capacity is as strong now as ever.

- 6.7 The ability to create EV charging facilities at the site without the requirement to secure planning permission with reference to the site’s planning history (CLOPUD) (ref. no. 49133/APP/2024/539) is acknowledged. However, the development proposals seek to create a hub facility that offers an exceptional visitor experience, within a safe and secure and attractive environment, supplemented with appropriate support services. This requirement exceeds the permitted development thresholds, and as such, planning permission is sought. However, given the compelling planning policy support for the principle of the development, it is anticipated that this approach can be endorsed by LBH.

Transport

- 6.8 As detailed earlier in the Statement and assessed in more detail within the submitted Transport Statement, the proposal will reduce the number of available car parking spaces at the existing car park from 106 to 80. The current car park has an average daily usage of 84 vehicles assuming a worst-case scenario where vehicles stay for a full day having arrived at the start of the day. The proposed development will in theory, therefore, result in the car park being four vehicles over capacity, and as such have a minimal impact on parking levels and total capacity at the site.
- 6.9 However, the current average users per day figure (84) does not account for periods of arrival/departure, a short period of peak parking demand, and ad hoc drop offs which do not stay any length of time – it is likely full-day use of the car park sits below 84 cars per day. Given this, the proposed limited reduction in car parking spaces is considered inconsequential.
- 6.10 Furthermore, this limited change in parking capacity should be considered within the context of prevailing transport policies. London Plan policies T1 (Strategic approach to transport) and T4 (Assessing and mitigating transport impacts) encourage an increased accessibility to sustainable modes of travel and the provision of EV charging infrastructure respectively (also noting the Mayor’s commitment to the provision of 40,000 new spaces across London in April 2024, referenced above). The slight reduction in car park capacity resulting from the creation of new spaces for EV charging should be considered acceptable in the context of the clear benefits arising from the scheme, not least the contribution made towards satisfying the acute need for additional charging facilities in London.
- 6.11 Additionally, the proposal is not likely to generate any new trips on the local highway network owing to the conversion of an existing car park, and the site’s convenient location on the local and strategic highway network. Trips to the site are anticipated to be either pass by trips that are routing the road network adjacent to the site and stop to use the facilities; or diverted trips that are already travelling on the wider highway network but slightly divert from their original route to access the site. This will be similar to the way vehicles visit a petrol station.
- 6.12 Overall, therefore, the Transport Statement demonstrates through the application of car park usage data that whilst total capacity of the car park reduces as a result of the

proposals, this is unlikely to affect car park use (noting existing spare capacity). Furthermore, it will not result in additional trip generation, given the nature of the use proposed i.e. it will rely on passing traffic already on the network. As a consequence, the proposal is in line with policy DMT1 of the Hillingdon Local Plan (part 2) which seeks to ensure proposals address transport impacts of the development in a sustainable manner. Furthermore, there will be no impact on local highway conditions, consistent with the requirements of policy DMT2 of the Hillingdon Local Plan (part 2).

Design and Access

Access

- 6.13 As outlined above and within the Transport Statement, the access to the application site via the A30 remains unchanged. In addition to the above, the existing (but currently closed) access to the car park off Southern Perimeter Road will be reopened under this proposal, allowing more convenient access to the site for potential customers looking to use the hub. The swept path analysis within the Transport Statement shows how the existing accesses are suitable and safe for the proposed development.
- 6.14 The subject application also proposes changes to the internal access and moveability of the site, including the provision of indicative walking routes and crossing points to facilitate access to the toilet and entrance to the site. It is envisaged that these improvements will benefit both the users of the proposed charging hub facility as well as existing visitors to the car park.
- 6.15 Two spaces closest to the Station provide wider bays (4.8metres) and the proposed toilet facility is designed for full disabled access.
- 6.16 The proposed access is therefore consistent with London Plan Policy D5 (Inclusive Design), which states that proposals should achieve the highest standards of accessible and inclusive design. The proposed access also aligns with the local policy, specifically, supporting text of policy DMT1 (Managing Transport Impacts) which requires development proposals to provide safe and adequate vehicular access, servicing and parking areas.

Design

- 6.17 The proposals create a high-quality environment for EV charging, with the architectural canopy helping to create a distinctive location. The yellow structure is now synonymous with the Fastned product that is becoming a familiar and reassuring sight at roadside locations across Europe. At each new Fastned site, there is an ambition to provide the highest quality of equipment, that is reliable, fast and efficient, and the success of the Company in this regard can be taken from the string of awards bestowed upon Fastned – it is consistently recognised as one of the best EV charging providers, across Europe and also in its growing presence in the UK. The design of each hub, creating an attractive place to visit, is seen as key to this continued success.
- 6.18 Similarly, each site is designed to create safe places to visit. At Hatton Cross, as with other sites, there is complete site CCTV coverage, with lighting within the canopy structure ensuring each space is well-lit. The mobile app allows for ease of payment, with an option

for users to simply park up and plug in, with payment taken automatically, thereby reducing the time visitors spend at the chargers.

- 6.19 The provision of toilet facilities for users of the site complements the functionality of the EV charging hub, whilst the opportunity to introduce landscaping within the car park (plus the use of green walls on the toilet facility) ensures the outlook of the site is enhanced post implementation of the planning permission.
- 6.20 A final design feature of note is the incorporation of solar panels within the roof structure, adding to the sustainable qualities of the project, noting that power generated will be directed towards meeting the facility's needs. Exploiting this opportunity adds to the design quality of the scheme.
- 6.21 It is therefore considered that the proposed design of the development is in accordance with national and local policy, specifically London policies D3 and D5 and LBH policies BE1 and DMHB11, which require high quality design that maintains and improves the quality of the built environment. The current outlook of the site, presenting as a fully tarmacked car park with no design features strengthens this conclusion.
- 6.22 Furthermore, the design and access sections above (paragraphs 6.14- 6.23) demonstrate how the proposal meets the design requirements of the London Plan, in accordance with London Plan policy D4 (Delivering good design).

Archaeology

- 6.23 Notwithstanding the current status of the site as an operational car park, an archaeological desk-based assessment has been undertaken by Lichfields in support of the application to identify the potential for archaeological significance within the site area, given that the site is located within the Heathrow Area Archaeological Priority Zone (APZ). The study suggests that archaeological survival across the site is generally expected to be low-moderate, with the greatest levels of survival being from the Postmedieval and modern periods. The construction of Hatton Cross Station is highly likely to have affected the survival of any earlier archaeological remains present within the southeast corner of the site. As a consequence and with due regard to the limited intrusive nature of the proposed scheme, the report concludes that potential impacts on archaeological resources as a result of the proposed development are not considered significant.
- 6.24 From an archaeological perspective, the proposal is not considered to have a material impact on the archaeological resource and as such, it is in accordance with LBH policies DMHB 7 (Archaeological Priority Areas and Archaeological Priority Zones), and, Policy HE1 (Heritage), and London Plan Policy HC1 (Heritage Conservation and Growth).

Biodiversity Net Gain

- 6.25 With regard to Schedule 7A of the Town and Country Planning Act (1990), there is now a statutory duty for most new developments to deliver 10% BNG. The regulations outline some exceptions to this including the 'de minimis exemption'. The de minimis exemption applies to development that does not impact priority habitat and impacts less than 25 square metres of non-priority onsite habitat.

- 6.26 The site contains no priority habitat or non-priority habitat, given it is formed of solely sealed, concrete surfaces. The de minimis exemption therefore applies to the site and 10% BNG does not need to be provided.
- 6.27 Notwithstanding this exemption, it is noted that the proposals introduce two distinct areas of soft landscaping in the areas adjacent to the proposed substation and the toilet facilities. This will create limited landscaping but at a location that currently has no such provision, enhancing the outlook of the site consistent with LBH policies DMHB11, DMHB14 and EM7, and London Plan Policy G6 (which combined seek soft landscaping and support biodiversity provision as part of proposals).

7.0 Conclusion

- 7.1 This Planning Statement has been prepared by Lichfields on behalf of Fast Places Limited to accompany a full planning application for the provision of 12 EV charging points, covering canopy, a toilet facility, and associated works at Hatton Cross Station Car Park, Great South-West Road, Longford, Hounslow, TW14 0PR.
- 7.2 This Statement assesses the application proposals against the statutory development plan, as well as other material considerations including relevant national policy. This has demonstrated the overwhelming policy support for the principle of creating additional EV charging capacity across the UK and within London specifically. There is an acute need for such facilities and the importance of an increase in EV charging capacity in enabling the switch to EVs (which the Government acknowledges is the UK's "largest carbon saving measure" see "*Phasing out sales of new petrol and diesel cars from 2030 and supporting the ZEV transition: Government Consultation*") is widely acknowledged.
- 7.3 The proposed development will create a new EV ultra-fast charging hub in the highly accessible location, with complementary support services. It will adopt the latest in technologies, delivering reliable, convenient, and easy to use chargers, within a safe and secure environment. The current parking area will be transformed, with the creation of an attractive, part-landscaped and architecturally distinctive new EV charging hub, to serve local residents and employees.
- 7.4 The application is the first product of the joint venture between Places for London, (TfL's property company) and Fastned, a relationship that is proposing the roll out of EV charging facilities across TfL's portfolio. A total of five schemes are proposed as part of the first tranche of developments, with more planned in the future. Combined, the developments begin to offer a solution to addressing the identified shortfall in London's EV charging capacity, and with it make a material contribution towards the required transition towards the electrification of vehicles and a net zero economy.
- 7.5 Overall, it is considered that the proposals present a high-quality, attractive and sustainable development designed to meet an identified and important need for such infrastructure. Given this, it is anticipated that in accordance with local and national policy, the application proposals can be considered positively.

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