



Planning & Development Ltd

JMS PLANNING & DEVELOPMENT LTD

**PLANNING, DESIGN AND ACCESS STATEMENT IN
SUPPORT OF PLANNING APPLICATION BY SHELL
UK OIL PRODUCTS LIMITED**

**IN RESPECT OF THE PROVISION OF AN EVC HUB
AND ASSOCIATED WORKS**

AT

**SHELL WEST DRAYTON
HOLLOWAY LANE
WEST DRAYTON
UB7 0AE**

Client: Shell UK Oil Products Limited
Project: EVC Hub at Shell West Drayton
Date: January 2022

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SECTION 1: INTRODUCTION

1.1 This Planning Statement, also incorporating the Design and Access Statement, has been prepared on behalf of Shell UK Oil Products Limited and is submitted in support of an application for full planning permission for the provision of an EVC hub and associated works at Shell West Drayton, Holloway Lane, West Drayton, UB7 0AE.

1.2 It is considered that the submitted application is of significant merit. Namely;

- The application will provide an improved roadside infrastructure and additional consumer choice for users of the local and strategic highway network;
- The provision of an electric vehicle charging hub is in accordance with National Government policy to implement a rapid charge point network; and
- It provides a low carbon refuelling facility which will help meet the UK's legally binding target to reduce total CO₂ emissions by at least 80% (relative to 1990 levels) by 2050.

1.3 This Report continues in Section 2 by providing a summary of the site's location and its context, with a brief summary of the planning history for the site within Section 3. Full details of the proposal are set out in Section 4, including a detailed description of the layout and facilities offered upon the site. Additional information in relation to electric vehicle recharging is contained in Section 5. A detailed summary of the planning policy position at national and local level is contained within Section 6. Section 7 sets out the justification for the proposal in the context of national requirements, local need, and the policy position. A Statement on Design and Access matters is provided within Section 8, with the conclusions finally drawn in Section 9.

SECTION 2: SITE AND SURROUNDING AREA

- 2.1 The application site ("*the site*") is located on the northern side of Holloway Lane (A3044) at its junction with Harmondsworth Road. Harmondsworth Road crosses the M4 about 150m north of the site (albeit with no access to the M4) and provides access to the urban area of West Drayton. Heathrow Airport and its associated development is about 1 mile south of the site (as the crow flies) and can be accessed via Holloway Lane.
- 2.2 The petrol filling station comprises of a central forecourt with four pump islands in a four square arrangement providing refuelling for eight vehicles with a canopy above and a sales building to the west with a drive-thru car wash to the rear. Two jet wash bays are located along the northern boundary of the site alongside car care facilities and parking. A single EVC bay is located to the eastern corner of the site by the substation. An HGV fuel pump is provided adjacent to Harmondsworth Road parallel with the domestic forecourt.
- 2.3 There are two access points to the site, one from Holloway Lane and a second in Harmondsworth Road, both operational as entrance and exit points.
- 2.4 As noted above, the Shell site includes the petrol station forecourt and sales building and car care and washing facilities. To the south of the site is Holloway Lane beyond which are agricultural fields. To the east of the site is Harmondsworth Road also with fields beyond. To the north of the site is an area of hardstanding, which it is understood is used for coach storage with a further storage area to the west also used for vehicle storage. Immediately to the west of the site is a wooded area between the hardstanding and Holloway Lane. To the far east is a large garden centre, with aquatics, dog grooming, plus a scaffold storage area.
- 2.5 The site is not located within a Conservation Area nor are there any listed buildings in the vicinity, but the site is within the Green Belt and Archaeological Priority Area. The site is located within Flood Zone 1.

SECTION 3: PLANNING HISTORY

- 3.1 A review of planning history of the application site has been undertaken using LB Hillingdon's online database.
- 3.2 There is limited planning history for the site, and it appears the last relevant permission was granted in 1992 (Ref: 4232/W/92/1932) for the *"redevelopment of existing petrol filling station and erection of a new sales building, forecourt canopy, underground storage tanks, bin storage area, floodlights, close circuit TV cameras, associated parking and landscaping."* No plans or documents are available online. There have been subsequent advertisement applications but no planning applications.
- 3.3 Accordingly, the above suggests the site has a long history of petrol station use.

SECTION 4: THE APPLICATION PROPOSAL

- 4.1 The application seeks full planning permission for the provision of an EVC hub and associated works at Shell West Drayton, Holloway Lane, West Drayton, UB7 0AE.
- 4.2 Four electric vehicle (EV) charging bays are proposed on the northern boundary of the site plus a new EV equipment compound and substation to the west of the site. The proposal replaces the existing single EVC bay and results in the removal of the jet wash (one remains), and the car care (air/water and vac) facilities are configured. More details of the EVC facilities are provided in the next Section of this report and on the submitted plans.
- 4.3 No other changes are proposed. The existing sales building forecourt, including canopy, pumps, tank farm and associated infrastructure will remain as existing. Existing hardstanding and boundary treatments will remain as existing. The existing landscaping will all be retained bar the shrubs to the south of the existing EVC. There are no proposed alterations to the existing access and egress arrangements.

Role, Function and Location of Petrol Filling Stations

- 4.4 Prior to the consideration of this application, it is relevant to consider the context in which the application is submitted, both in terms of current trends within the petroleum industry and the specific reference to the role, function and location of petrol filling stations generally, as well as the specific role and function of the application site.
- 4.5 The Experian Catalist UK database released in 2020, confirms that the number of petrol forecourts in the UK had fallen to just 8,385, compared to the 1967's all-time high of 39,958 forecourts. This is representative of a downward trend of petrol filling station sites in the UK.
- 4.6 Conversely, the number of registered UK vehicles once again broke records, rising from 33.98 million in the first quarter of 2009 to reach 39.5 million at the end of March 2020, with each forecourt supplying an average of 4,715 vehicles.

- 4.7 The effect of the above is that fewer service stations are serving more motorists. As a result, those individual service stations which remain and any new facilities are becoming increasingly busier, experiencing a greater volume of visitation rates and a greater throughput of fuel and are, thus, being made to work much more intensively. It is self-evident that the role and function of petrol filling stations are geared towards serving the motorist. Depending upon the location of petrol filling stations, such developments have the potential to intersect traffic from a wide catchment area.
- 4.8 Petrol filling stations generally offer a range of services. These include the provision of fuels, car care facilities (such as air/water and car washing) and shops. However, the qualitative demands on petrol filling stations are increasing. In particular, existing petrol filling stations have to accommodate a greater variety of facilities and provide a high-quality offer to customers and users who are becoming increasingly demanding for enhanced facilities.
- 4.9 In this respect, enhanced sales building facilities is a major trend within the roadside market which has evolved in response to accommodate and meet the changing needs and aspirations of consumers and motorists.

SECTION 5: BACKGROUND TO ELECTRIC VEHICLE RECHARGING

- 5.1 Powering more of the cars we drive with electricity is essential to addressing growing CO₂ emissions and air pollution in cities. As more electric car models become available, they will also become more affordable choice for people and businesses.
- 5.2 There are around one billion cars on the world's roads. Of these around two to three million are pure battery electric and plug-in hybrid electric vehicles, according to the International Energy Agency (IEA). The IEA anticipates there may be three hundred to four hundred million electric vehicles (EVs) on the road out of approximately two billion vehicles by 2040.
- 5.3 Electric vehicles are cars and other forms of mobility that use an electric motor as their main source of propulsion, rather than a conventional engine. They also have their energy stored in batteries.
- 5.4 There are three main types of electric vehicles; battery electric vehicles, hybrid electric vehicles and plug-in hybrid electric vehicles.
- 5.5 Battery electric vehicles are all electric cars that rely on their batteries as the only source of energy. Hybrid and plug-in hybrid electric vehicles combine electric drive with a conventional fuel engine.
- 5.6 Unlike traditional cars, which usually refuel at petrol stations, electric cars have the potential to be recharged at home, at work or on the go. They can also be charged in shared locations such as forecourts, car parks or supermarkets. Speed, availability and the reliability of charging infrastructure are currently the biggest potential deterrents to buying an electric car. Shell believes this could be changed with better access to recharging options, better suited to the needs of customers and their lifestyles. This could include smart, regular chargers, ideal for those charging overnight at their homes or during working hours. It could also include high powered, fast chargers designed for when drivers are between destinations and in need of a quick top-up.

Energy White Paper (December 2020)

- 5.7 On 14 December 2020 the Government published its Energy White Paper which expands on Prime Minister Boris Johnson's announced ten point plan for a green industrial revolution and sets out the steps needed to cut emissions from industry, transport and buildings by 230 million metric tonnes as part of the journey to net zero emissions by 2050.
- 5.8 The document sets out how the UK will increase deployment of green energy sources in order to meet the 2050 net zero carbon target. The White Paper confirms the Government will support the roll out of charging and associated grid infrastructure along the strategic road network to support drivers to make the switch to electric vehicles (EV's). It is confirmed that the UK will end the sale of new petrol and diesel cars and vans by 2030, ten years earlier than previously planned. The sale of hybrid cars and vans that can drive a significant distance with no carbon emissions will continue until 2035. The Energy White Paper notes that this accelerated transition requires scaling – up the roll out of EV charge points and, in turn, an associated expansion of electricity generation and network capacity to meet the increase in demand for power.
- 5.9 With the necessary investment in new infrastructure and adoption of smart charging the Government is confident the system will cope with the transition. As part of a £2.8bn package announced in the Prime Minister's ten point plan the Government intends to provide funding of £1.3bn to accelerate the roll out of charge points for EV's in homes, workplaces, streets and on motorways across England, so people can more easily and conveniently charge their cars. The Government will invest £950m of this funding in future proofing grid capacity along with the strategic road network to prepare ahead to accommodate for a one hundred percent take up of zero emission cars and vans.
- 5.10 There is, therefore, acknowledgement at the highest level of Government of the importance of a comprehensive EV network.

Net Zero Strategy: Build Back Greener (October 2021)

- 5.11 The Net Zero Strategy: Build Back Greener was presented to Parliament pursuant to Section 14 of the Climate Change Act 2008 in October 2021. In a drive to avoid catastrophic climate change we need to reduce emissions to as near zero as possible with the small amount remaining absorbed through natural carbon sinks such as forests and new technologies like carbon capture. If this goal is achieved, global emissions of greenhouse gases will be '*net zero*'. Delivering this requires urgent global action including ending coal fired power generation, retiring petrol and diesel engines from all cars and halting deforestation. These were the steps the UK called for at COP 26 (UN Climate Change Conference to be held in November 2021).
- 5.12 The UK is seeking to lead the way having, since 1990, almost halved greenhouse gas emissions, with the UK the first major economy to legislate (in 2019) to reach zero emissions by 2050. The end of petrol and diesel engines is part of this process and almost all major car companies are now developing or producing zero emission vehicles as battery technology improves and costs reduce.
- 5.13 The strategy supports new investment in vehicle grants and electric vehicles infrastructure to ensure greener vehicles with big improvements in public charge point provision with funding of £280 million as part of a wider investment in public transport and sustainable travel.
- 5.14 Leading on from this Strategy the Government announced an '*Electric Vehicle revolution*' in November 2021, which set out the Government's vision for infrastructure roll out and roles for the public and private sectors in achieving these goals. This document focused on electric charging provision at home and work places with targets for electric vehicle provision, alongside other green energy initiatives.

State of Switch Report Produced by New Automotive (October 2021)

- 5.15 New Automotive is a new independent transport research organisation founded in 2020 with a mission to support the switch to electric vehicles. Based on their research published in October 2021 they estimate that the UK will need 230,000-280,000 public charge points by 2035. However, at the current time, there are 24,000 public charging stations including over 4,000 rapid chargers in the UK.

- 5.16 The report concludes whilst there has been a huge uptake in EV sales over the past 12 months, they believe the targets are only achievable if policy makers commit to the '*electrification*' of UK roads and install the necessary infrastructure. They are currently concerned that the most recent trends indicate the popularity of hybrids which may be one of the key issues to overcome in the transition to a complete shift to electric vehicles.
- 5.17 Another key issue is the provision of charging points which will become increasingly important as the ownership of EVs spreads across the wider population. They hope the State of Switch report becomes an annual publication tracking the delivery and support for electric vehicles over time.

The Role of the Applicant

- 5.18 As the UK's number one provider of premier fuels with a network of over 1,000 service stations, Shell is encouraging the take-up of electric vehicles by providing rapid charging points on many of their forecourts.
- 5.19 Whilst charging electric cars at home is often the most convenient and cost effective way to recharge sometimes this option is neither convenient nor available. A growing number of Shell forecourts in the UK are offering fast electric vehicle charging. This takes only around 30 minutes to fully charge and also provides electric car drivers with a shorter option to just top-up to get to their destination.
- 5.20 By installing high powered, fast chargers at Shell sites countrywide, Shell is helping electric vehicle drivers to travel long distances confidently and with ease.
- 5.21 The application proposal includes for the provision of four EV charging spaces in the form of a new EV '*hub*' which will have the benefit of improving the energy transition within West Drayton and the wider area and will offer increased choice and improved customer experience across the wider site, meeting the needs of customers.

SECTION 6: PLANNING POLICY FRAMEWORK

- 6.1 This Section of the supporting statement sets out the relevant national and local planning policy framework relevant to the proposed planning application, including policies relevant to design and access matters.

National Planning Policy Framework

- 6.2 The revised National Planning Policy Framework (NPPF) was updated in July 2021 and constitutes guidance for local planning authorities and decision-takers and is a material consideration in the determination of planning applications (paragraph 2).
- 6.3 The purpose of the planning system is to contribute to the achievement of sustainable development (paragraph 7). Reference has recently been added to the 17 Global Goals for sustainable development set by the United Nations.
- 6.4 Paragraph 8 confirms that there are three overarching objectives to sustainable development: economic, social, and environmental, which are interdependent and need to be pursued in mutually supportive ways.
- An economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;
 - A social objective – to support strong, vibrant and healthy communities by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural wellbeing; and

- An environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making efficient use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.
- 6.5 These objectives should be delivered through the preparation and implementation of plans and application of policies in the framework; they are not criteria against which every decision can or should be judged. It is confirmed that the planning system should play an active role in guiding development to sustainable solutions, but in doing so should take local circumstances into account, to reflect the character, needs and opportunities of each area (paragraph 9).
- 6.6 At the heart of the NPPF is a presumption in favour of sustainable development (paragraph 10). For decision taking, this means:
- Approving development proposals that accord with the Development Plan without delay, and
 - Where there are no relevant Development Plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless;
 - The application of policies in the framework that protect areas or assets of particular importance provides clear reason for refusing the development proposed; or
 - Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this framework taken as a whole (paragraph 11).
- 6.7 The presumption in favour of sustainable development does not change the statutory status of the Development Plan as the starting point for decision making (paragraph 12).
- 6.8 Local Planning Authorities should approach decisions on proposed development in a positive and creative way. They should use the full range of planning tools available and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision makers at every level should seek to approve applications for sustainable development where possible (paragraph 38).

- 6.9 Planning law requires that applications for planning permission be determined in accordance with the Development Plan unless material considerations indicate otherwise. Decisions on applications should be made as quickly as possible, and within statutory timescales unless a longer period has been agreed by the applicant in writing (paragraph 47). Local Authorities may give weight to relevant policies and emerging plans according to the stage at which they are at and the extent of unresolved objections (paragraph 48).
- 6.10 Planning policies and decisions should help create the conditions which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and where there are opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future (paragraph 81).
- 6.11 Planning policies should set out a clear economic vision and strategy which positively and practically encourages sustainable economic growth having regard to local industrial strategies and other local policies for economic development and regeneration; set criteria to identify strategic sites for local inward investment to match the strategy and meet anticipated needs over the plan period; seek to address potential barriers to investment; and be flexible enough to accommodate the needs not anticipated in the plan, allow for new and flexible working practices and to enable a rapid response to changes in economic circumstances (paragraph 82).
- 6.12 Planning policies and decisions should recognise and address the specific locational requirements of different sectors (paragraph 83).
- 6.13 Transport issues should be considered from the early stage of plan making in development proposals so that potential impacts of development and transport networks can be addressed, opportunities from existing or proposed transport infrastructure and changing transport technology and usage are realised – for example in relation to the scale, location or density of development that can be accommodated; opportunities to promote walking, cycling or public transport are identified and pursued; the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account – including appropriate opportunities for avoiding and mitigating any adverse effects and for net environmental gains;

and patterns of movement, streets, parking and other transport considerations are integral to the design of schemes and contribute to making high quality places (paragraph 104).

- 6.14 Paragraph 106 confirms that planning policies should provide for any large-scale transport facilities that need to be located in the area, and the infrastructure and wider development required to support their operation, expansion and contribution to the wider economy. The footnote to this paragraph notes that such facilities will include roadside services but that the primary purpose of these services should be to support the safety and welfare of the road user (and most such proposals are unlikely to be nationally significant infrastructure projects).
- 6.15 Within the context of promoting sustainable transport, paragraph 112 advises that applications for development should be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.
- 6.16 Planning policies and decisions should promote an effective use of land in meeting the needs for homes and other uses, whilst safeguarding and improving the environment and ensuring safe and healthy living conditions (paragraph 119).
- 6.17 The creation of high-quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps to make development acceptable to communities. Being clear about design expectations, and how these will be tested, is essential for achieving this. So too is the effective engagement between applicants, communities, Local Planning Authorities and other interests throughout the process (paragraph 126).
- 6.18 Planning policies and decisions should ensure that developments 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; are visually attractive as a result of good architecture, layout and appropriate and effective landscaping; are sympathetic to local character and history; establish or maintain a strong sense of place; and 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 users (paragraph 130).

- 6.19 Design quality should be considered throughout the evolution and assessment of individual proposals (paragraph 132). Development that is not well designed should be refused especially where it fails to reflect local design policies and government guidance taking into account local design guides and codes (paragraph 134).
- 6.20 The Government attaches great importance to Green Belts and the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence (paragraph 137).
- 6.21 Green Belt serves five purposes (paragraph 138), namely:
- (a) To check the unrestricted sprawl of large built up areas;
 - (b) To prevent neighbouring towns merging into one another;
 - (c) To assist in safeguarding the countryside from encroachment;
 - (d) To preserve the setting and special character of historic towns; and
 - (e) To assist in urban regeneration by encouraging the recycling of derelict and other urban land.
- 6.22 Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in Very Special Circumstances (paragraph 147). When considering any planning application Local Planning Authorities should ensure that substantial weight is given to any harm to the Green Belt. “*Very Special Circumstances*” will not exist unless potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations (paragraph 148).
- 6.23 Paragraph 149 advises that Local Planning Authorities should regard the construction of new buildings as inappropriate in the Green Belt but lists a number of exceptions, which include; extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building; the replacement of a building, providing the new building is in the same use and not materially larger than the one it replaces; and limited infilling or the partial or complete redevelopment of previously developed land which will not have a greater impact on the openness of the Green Belt than the existing development.

- 6.24 Paragraph 150 confirms certain other forms of development, which are not considered inappropriate within the Green Belt provided they preserve its openness and do not conflict with the purposes of including land, include:
- Local transport infrastructure, which can demonstrate a requirement for a Green Belt location.
- 6.25 Paragraph 151 recognises that, when located in the Green Belt, elements of many renewable energy projects may comprise inappropriate development and in such cases developers should demonstrate very special circumstances. Such very special circumstances may include the wider environmental benefits associated with increased production of energy from renewable sources.
- 6.26 Chapter 14 of the NPPF sets out advice on meeting the challenges of climate change, flooding and coastal change. The opening paragraph to this Section confirms that the planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience, encourage the reuse of existing resources, including the conversion of existing buildings and support renewable and low carbon energy and associated infrastructure (paragraph 152).
- 6.27 To help increase the use and supply of renewable and low carbon energy and heat, the plan should provide a positive strategy for energy from these resources, that maximise the potential for suitable development, whilst ensuring that adverse impacts are addressed satisfactorily; consider and identify suitable areas for renewable and low carbon energy sources, and supporting infrastructure, where this would help secure their development; and identify opportunities for development to draw its energy supply from a decentralised, renewable or low carbon energy supply systems (paragraph 155).
- 6.28 Local Planning Authorities should support community lead initiatives for renewable and low carbon energy, including developments outside areas identified in local plans or other strategic policies that have been taken forward through neighbourhood planning (paragraph 156).

- 6.29 When determining planning applications for renewable and low carbon development local planning authorities should not require applicants to demonstrate the overall need for the renewable or low carbon energy and recognise that even small-scale projects provide a valuable contribution to cutting greenhouse gas emissions; and approve the application if its impacts are (or can be made) acceptable (paragraph 158).
- 6.30 Accordingly, the NPPF sets out clear guidance on the environmental role that a low carbon energy can have in the future of planning and offers support to low carbon energy initiatives.

The Development Plan

- 6.31 To the extent the Development Plan policies are material to an application for planning permission, a decision must be taken in accordance with the Development Plan unless there are material considerations that indicate otherwise (Section 70(2) of the Town and Country Planning Act 1990 and Section 38(6) of the Planning and Compulsory Purchase Act 2004).
- 6.32 The Development Plan relevant to the application comprises the London Plan (March 2021) and the Hillingdon Local Plan Part 1 – Strategic Policies adopted November 2012 and Part 2 – Development Management Policies, adopted January 2020.
- 6.33 On the Proposals Map the site is within the Metropolitan Green Belt and Archaeological Priority Area.

The London Plan (March 2021)

- 6.34 Policy GG1 (Building Strong and Inclusive Communities) confirms that good growth is inclusive growth. This policy requires those involved in planning and development to build on the city's tradition of openness, diversity and quality and help to deliver strong and inclusive communities. The policy sets out a number of criteria including; seek to ensure changes to the physical environment to achieve an overall positive contribution to London; provide access to good quality community spaces, services, amenities and infrastructure that accommodate, encourage and strengthen communities, increasing active participation and social integration and addressing social isolation; seek to ensure that London continues to generate a wide range of economic and other opportunities, and that everyone is able to benefit from these to ensure that London is a fairer, more inclusive and equal city; ensure that streets and public spaces are

consistently planned for people to move around and spend time in comfort and safety, creating places where everyone is welcome, which foster a sense of belonging, which encourage community buy in and where community can develop and thrive; ensure that new buildings and the spaces they create are designed to reinforce or enhance identity, legibility, permeability and inclusivity of neighbourhoods and are resilient and adaptable to changes in community requirements, and ensuring that an inclusive London is created, minimising barriers, challenges and inequalities.

6.35 Policy GG2 (Making the Best Use of Land) provides advice on creating successful, sustainable, mixed-use places that make best use of land. This policy encourages those involved in planning and development to:

- Enable the development of brownfield land;
- Prioritise sites which are well connected by existing and planned public transport;
- Protect and enhance London's open spaces, including the Green Belt, Metropolitan Open Land and other designated spaces, including aiming to secure net biodiversity gains where possible; and
- Plan for good walking, cycling and public transport connections.

6.36 Policy GG3 (Creating a Healthy City) seeks to improve Londoners' health and reduce health inequalities and sets out a number of considerations to improve the mental and physical health of Londoners and reducing health inequalities. These include:

- The promotion of more active and healthy lives for all Londoners to enable them to make healthy choices; and
- Seek to improve London's air quality.

6.37 Policy GG5 (Growing a Good Economy) seeks to conserve and enhance London's global, economic and competitiveness and ensure that economic success is shared amongst all Londoners. This is to be achieved by:

- Promote the strength and potential of the wider city region;
- Seek to ensure that London's economy diversifies and that the benefits of economic success are shared equitably across London;

- Plan for sufficient employment and industrial space in the right locations to support economic development and regeneration; and
- Recognise and promote the benefits of transition to a low carbon circular economy to strengthen London's economic success.

6.38 Policy GG6 (Increasing Efficiency and Resilience) aims to help London become a more efficient and resilient city and specifically supports improved energy efficiency and the move towards a low carbon circular economy, contributing to London becoming a zero carbon city by 2050.

6.39 Policy D1 (London's Form, Character and Capacity for Growth) provides guidance on defining an area's character to understand its capacity for growth, and then planning for growth. This policy encourages Boroughs to undertake area assessments to define the characteristics, qualities and values of different places within the Plan area for developers to understand the different areas capacity for growth.

6.40 Policy D2 (Optimising Site Capacity Through the Design Led Approach) seeks to ensure that all development makes the best use of land by following a design led approach that optimises the capacity of sites, which means ensuring that development is of the most appropriate form and land use for the site. This policy requires consideration to form and layout and seeks to encourage and facilitate active travel with convenient and inclusive pedestrian and cycle routes, crossing points, cycle parking and legible entrances to buildings that are aligned with people's movements, patterns and desire lines in the area.

6.41 Policy D3 also seeks to encourage safe, secure and inclusive environments, active frontages and appropriate relationships between inside and outside of buildings, appropriate outlook, privacy and amenity, prevention of impacts of noise and poor air quality and environments which are comfortable and inviting for people to use. The policy also encourages consideration to the character of the area, developments to be of high quality and aim for high sustainable standards.

6.42 Policy D4 (Delivering Good Design) confirms that Design and Access Statements should be submitted with development proposals to demonstrate that the proposal meets the design requirements of the London Plan. The policy sets out guidance for Design Reviews (the proposal falls below the threshold for Design Reviews).

- 6.43 Policy D5 (Inclusive Design) seeks to ensure that development proposals achieve the highest standards of accessible and inclusive design. They should:
- Be designed to take into account London's diverse population;
 - Provide high quality people focused spaces that are designed to facilitate social interaction and inclusion;
 - Be convenient and welcoming with no disabling barriers, providing independent access without additional undue effort, separation or special treatment;
 - Be able to be entered, used and exited safely, easily and with dignity for all; and
 - Be designed to incorporate safe and dignified emergency evacuation for all building users.
- 6.44 Policy D5 also requires that a Design and Access Statement be submitted as part of development proposals and should include an Inclusive Design Statement.
- 6.45 Policy D13 (Agent of Change) confirms that the 'agent of change' principle places the responsibility for mitigating impacts from existing noise and other noise generating activities or uses on the proposed new noise sensitive development.
- 6.46 Policy SI1 (Improving Air Quality) confirms that Development Plans, through relevant strategic, site specific and area based policies should seek opportunities to identify and deliver further improvements to the air quality and should not reduce air quality benefits that result from the Mayor's or Borough's activities to improve their quality. To tackle poor air quality, protect health and meet legal obligations, development proposals should not lead to further deterioration of existing poor air quality, create new areas that exceed air quality limits or create unacceptable risk of high levels of exposure to air quality. Major development proposals are required to be submitted with an Air Quality Assessment, albeit the application proposal falls below this requirement.

- 6.47 Policy SI2 (Minimising Greenhouse Gas Emissions) requires that major development should be net zero carbon, which means reducing greenhouse gas emissions in operation and minimising both annual and peak energy demand in accordance with the following green hierarchy; be lean, be clean, be green, be seen. Major development proposals will be required to include a detailed energy strategy, albeit the proposal will fall below this requirement.
- 6.48 Policy T6 (Car Parking) confirms that car parking should be restricted in line with levels of existing and future public transport accessibility and connectivity and maximum car parking spaces will be applied. Disabled provision should be made, and provision should be made for infrastructure by electric or other ultra-low emission vehicles in line with policies in the Local Plan. Specifically, new or re-provided petrol stations should provide rapid charging hubs and/or hydrogen refuelling facilities.

Hillingdon Local Plan Part 1 – Strategic Policies, Adopted November 2012

- 6.49 Policy NPPF (National Planning Policy Framework – Presumption in Favour of Sustainable Development) confirms that the Council will take a positive approach that reflects an assumption in favour of sustainable development contained in the National Planning Policy Framework. The policy also confirms that the Council will always work proactively with applicants to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area. The policy states that planning applications that accord with the policies in this Local Plan (and where relevant policies in Neighbourhood Plans) will be approved without delay unless material considerations indicate otherwise.
- 6.50 Policy EM1 (Climate Change Adaption Mitigation) confirms that the Council will ensure that climate change mitigation is addressed at every stage of the development process. The policy sets out a number of assessments which include low carbon strategies to improve air quality and whilst there is not an explicit reference made to electric vehicle charging, the benefit of improving sustainable travel is acknowledged.

- 6.51 Policy EM2 (Green Belt, Metropolitan Open Land and Green Chains) confirms that the Council will seek to maintain the current extent, hierarchy and strategic functions of the Green Belt, Metropolitan Open Land and Green Chains. Any proposals for development in the Green Belt and Metropolitan Open Land will be assessed against national and London Plan policies, including the '*Very Special Circumstances*' test.
- 6.52 Policy EM8 (Land, Water, Air and Noise) confirms the Council will seek to ensure that the quality of all of the above aspects is maintained. In Air Quality Management Areas major development will be encouraged to actively contribute to preservation of sustainable transport measures such as vehicle charging points and the increased provision for vehicles with cleaner transport fuels amongst other things. It is noted that the site does fall within an Air Quality Management Area, which covers the whole of the southern part of the Borough.

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- 6.53 The most relevant policy within this plan is Policy DMEI-4 (Development in the Green Belt or on Metropolitan Open Land) which confirms that inappropriate development in the Green Belt and Metropolitan Open Land will not be permitted unless there are '*Very Special Circumstances*'. The policy also advises that extensions and redevelopment on sites in the Green Belt and Metropolitan Open Land will be permitted anywhere the proposal would not have a greater impact on the openness of the Green Belt and Metropolitan Open Land and the purpose of including land within it than the existing development having regard to:
- (i) The height and bulk of the existing building on 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 it is to be retained; and
 - (v) The visual amenity and character of the Green Belt and Metropolitan Open Land.
- 6.54 It is also noted that within the Parking Standards, reference is made to the provision of electric vehicle charging and the need to ensure that appropriate provision is made.

SECTION 7: PLANNING ISSUES

7.1 This section of the Planning Statement sets out the general planning matters which require consideration in the determination of this application. Accordingly, the following general planning matters are considered below:

- Impact on the Green Belt;
- The principle of development on the site;
- Sustainability credentials of the scheme;
- Amenity;
- Traffic generation and Highway;
- Air quality;
- Health and safety; and
- Flooding.

Impact on the Green Belt

7.2 As set out in the Planning Policy Section, the National Planning Policy Framework confirms that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open, with the essential characteristic of Green Belts being their openness and their permanence. Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in Very Special Circumstances, subject to a number of exceptions, one of which includes local transport infrastructure (paragraph 146).

7.3 It is our view that the site already represents '*local transport infrastructure*' meeting the aims and objectives set out in the NPPF. This is supported by Case Law and in particular Appeal reference APP/W12525/W/14/3001905 – Land at Fenn Roundabout, Burnham Road, South Woodham Ferrers. This related to a proposal on an 'A' road and the Inspector concluded that the Department for Transport Circular 02/2013 in relation to roadside facilities could equally apply to similar facilities on other main roads as there is no logical reason why similar facilities on other main roads should not perform an equally important function (to those on the strategic road network). Therefore, this site is also considered '*local transport infrastructure*' and not considered inappropriate development.

- 7.4 Further, Local Plan Policy DMEI-4 relating to Green Belt development allows for extensions and redevelopment provided consideration has been given to the scale of the development and there would not be a greater impact on the openness. In summary, the proposal represents very small-scale development with no built form but a change in use of the hardstanding areas providing improved facilities for motorists to meet their needs (again, discussed further below). No new land use is proposed, no new floorspace is proposed, and all development is contained within the confines of the existing site. There is no encroachment onto the surrounding countryside.
- 7.5 The application proposal is also considered in the context of the five Green Belt purposes. The site is currently operating as a petrol filling station including a retail sales building, forecourt and canopy with various other associated elements. Accordingly, the site is not a traditional greenfield site, in that it is currently already developed. The proposal merely seeks to add EVC in the location of an existing jet wash and parking area to enhance the petrol station facility to better meet the needs of users of the site and evolving motorists' needs.
- 7.6 The following paragraphs assess the site in the context of the five purposes for including land in the Green Belt.
- 7.7 The site has no function in restricting the sprawl of large built-up areas as it is already developed and is bounded by roads with development to the rear. The wider area to the west and north is not open countryside but in commercial use. Accordingly, the site is already developed and does not form an open, undeveloped area of Green Belt land and does not perform a role in preventing neighbouring towns merging..
- 7.8 The third purpose of including land within the Green Belt is to safeguard the countryside from encroachment. The site, as noted above, is already developed and the addition of EVC to the site will not result in the loss of countryside or encroachment into the countryside above and beyond the existing situation. The site is already as an established commercial use in this location and forms part of a collection of other development in the countryside.

- 7.9 The site is not located adjacent to a historic town and therefore the role of the Green Belt in this area is not to preserve the setting and special character of the historic town. Accordingly, the allocation of this site as Green Belt does not preserve the setting or character of a historic town.
- 7.10 Finally, Green Belt land is allocated to assist urban regeneration, encouraging the recycling of derelict and other urban land. As noted above, the site is already developed and there are no other suitable alternative sites which would be appropriate for EVC provision at a petrol filling station in this locality. Indeed, the abandonment of this site for an alternative site would be detrimental to the Green Belt as a derelict site would have a negative impact upon it. As the site is an existing petrol filling station, the proposed EVC is a natural evolution of the site and will have no impact on the regeneration of the urban area.
- 7.11 Whilst Green Belt land is identified as serving five purposes, the application site does not make any significant contribution to these five purposes and is merely part of a blanket Green Belt allocation across this part of London. Notwithstanding this comment, the importance of the Green Belt is acknowledged and the role that the Green Belt plays in protecting the countryside is accepted.
- 7.12 The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open with the essential characteristics of Green Belts being their openness and their permanence. One must consider the characteristics of the existing site, which is a petrol filling station with associated elements and hardstandings, enclosed by some landscaping. Therefore, the openness of the site has already been impacted by the existing development upon it but is contained by its boundary treatments. Accordingly, the principle of adding EVC to the site in the location of existing jet wash and parking/car care facilities is accepted by virtue of the existing position. It is therefore only the replacement structures and associated works which must be considered in terms of its impact upon the Green Belt, particularly its 'openness' and not the principle of the land use itself (which is discussed in further detail below).

- 7.13 Special circumstances have already been demonstrated in respect of petrol filling station requirements to show that the enhanced petrol filling station facilities are required to meet the needs of motorists and local residents in an environment where the number of petrol filling stations is ever decreasing, whilst the number of cars on the road is increasing and the role of electric vehicles is to be encouraged and supported.
- 7.14 Against the above consideration it must be noted that the proposal seeks to remove the jet wash and replace it with EVC. There will be no new built form bar the plant associated with the EVC as shown on the plans. This will have no meaningful impact on the openness of the site as will read as part of the petrol filling station.
- 7.15 There is a minor loss of landscaping, which is shrubs adjacent to the west boundary, south of the existing EVC to accommodate plant adjacent to the substation. There is potential for replacement planting elsewhere on the site if deemed necessary, but this will have no overall impact or the appearance or openness of the site when viewed as a whole.
- 7.16 It is considered that the provision of EVC is necessary to meet the needs of motorists travelling in the local area. The NPPF confirms the role of roadside services as being to support the safety and welfare of the road user and planning policies should support their operation, expansion, and contribution to the wider economy. The proposal will ensure that it continues to provide a valuable service, contributes to the economy and initiatives to decrease CO₂ emissions allowing increased electric vehicle ownership, and respects the Green Belt, therefore bringing positive benefits to the Green Belt over the existing position.

Principle of Development

- 7.17 Shell West Drayton is an established petrol filling station, located a strip of Green Belt adjacent to West Drayton, near Heathrow. The provision of an electric vehicle hub on the site as part of the existing petrol station site forms part of a nationwide initiative to reduce carbon dioxide emissions which is supported at both national and local level.

- 7.18 The principle of development for petrol filling station uses is established in this location and this has been confirmed by the planning history of the site which established its use as a petrol station dating back over 30 years. The provision of electric vehicle charging hub for new vehicle technology with zero carbon dioxide emissions is supported within Government guidance and Development Plan.
- 7.19 Accordingly, the principle of the proposed development on the site meets evolving motorists' needs with significant environmental benefits and is acceptable in principle and fully supported by national and local policy.

Sustainable Development Credentials

- 7.20 The fundamental principle upon which the National Planning Policy Framework is based is sustainable development. The document confirms that plans should protect and exploit opportunities for the use of sustainable transport modes for the movement of goods or people. Specifically the NPPF advises that applications for development should be designed to facilitate ultra-low emission vehicles in safe, accessible and convenient locations.
- 7.21 The NPPF states that planning has a key role to secure reductions in greenhouse gas emissions and that the planning system should support the transition to a low carbon future and support renewable and low carbon energy and associated infrastructure (paragraph 158). This is essential to the economic, social and environment dimensions of sustainable development. Accordingly, there is clear support from national policy for the use of non-fossil fuels and those with a low or zero carbon generation. This is reinforced in the London Plan with specific reference to petrol stations making provision for electric vehicles recharging and echoed in the Hillingdon Plans.
- 7.22 As expanded upon in Section 5, electric vehicles can significantly reduce CO₂ emissions from the transport sector, especially if electricity is generated from renewable technologies. The benefits of electric vehicles are expanded upon elsewhere in the report, but they have the benefit of improving local air quality and providing significant health benefits, helping to address air pollution, whilst offering a comfortable, quiet ride for motorists.

- 7.23 Whilst the number of electric vehicles within the UK is relatively few at the current time, and a lack (or perceived lack) of infrastructure is seen as a major constraint, there are significant environmental benefits to electric vehicles in environmental terms.
- 7.24 There are various policies in the development plan which supports and encourages the more widespread use of innovative energy technologies to reduce the use of fossil fuels and carbon dioxide emissions, and specific support for electric vehicles which have the potential to mitigate and adapt to climate change, reducing carbon dioxide emissions. Therefore it is considered that proposal complies with the aims of sustainable development policies, as electric vehicles and associated infrastructure support these objectives. This is therefore a material consideration weighing heavily in favour of the development.

Amenity

- 7.25 The proposal seeks to replace an existing area of hard surfacing used for car parking and jet washing with four electric vehicle charging points and supporting infrastructure mainly provided in the location of the existing electric vehicle charger on site. The infrastructure is positioned to the east of the site close to Holloway Lane and will be enclosed with a close boarded fence which will screen this element of the proposal.
- 7.26 Given the character of the site and surrounding area and the existence of the petrol filling station on site with its associated paraphernalia, it is considered that the proposal is acceptable as there are no amenity issues arising from the proposal.

Traffic Generation and Highways

- 7.27 The proposal, in terms of the principle of use, is supported at all levels from a transport perspective, with the introduction of low carbon vehicles meeting the objectives of climate change at a national and local level.
- 7.28 The addition of electric vehicle charging to the site is not considered to raise any issues as the existing operation of the site will remain unchanged. The visitation rates to the site are expected to be unchanged as site users will switch from petrol/diesel refuelling to EVC as the type of car ownership changes as part of the transition to electric vehicles.

Air Quality

- 7.29 It is noted that the site is located in an Air Quality Management Area (applies to the whole of the southern part of the Borough). There are significant environmental benefits, particularly to air quality, arising from the proposal. Whilst the impact of electric vehicles will not be immediate, the long term goal, with increased electric vehicle uptake, will result in decreased carbon dioxide emissions and improvements to local and national air quality. Accordingly, the long term benefits of the proposal in terms of air quality are positive.

Health and Safety

- 7.30 The proposal will accord with all the required health and safety regulations with consideration to the proposed location, meaning that there are no health and safety reasons why the proposal cannot be granted.

Flooding

- 7.31 The site falls within Flood Zone 1 where there is low probability of flooding, therefore a Flood Risk Assessment (FRA) is not required for this development.

SECTION 8: DESIGN AND ACCESS STATEMENT

- 8.1 This Design and Access Statement has been prepared on behalf of Shell UK Oil Products Limited and is submitted in support of an application for full planning permission for the provision of an EVC hub and associated works at Shell West Drayton, Holloway Lane, West Drayton, UB7 0AE.
- 8.2 The Design and Access Statement requirements of the site have evolved from an appraisal of the site's context, against the background of its location and proximity to the highway network and developed nature of the site.
- 8.3 In accordance with the requirements to formally state how design and access issues have been considered (under Section 61 of the Planning and Compulsory Purchase Act 2014) this document addresses the design principles and concepts that have been applied to development in relation to location, use, layout, scale, appearance and landscaping in relation to the site's context.
- 8.4 The Design and Access Statement should be read in context with the planning application's drawings and accompanying material.

Site Evaluation

- 8.5 There are a number of key issues which have informed the design solution for the site's development. Effectively, it balances the site's opportunities and constraints arising from the assessment of the site to deliver a development that improves the facilities on site, achieves high quality design, is sustainable, is economically viable and enhances the established locality.
- 8.6 The principal constraints can be identified as:
- The need to retain the forecourt and sales building as existing;
 - The need to provide EVC to meet the changing needs of motorists; and
 - The site's location in the Green Belt.

8.7 There are a number of opportunities afforded by the redevelopment of the site that are relevant material considerations in the evaluation of the proposals. In summary these are:

- The site offers an excellent location in terms of visibility and accessibility for motorists travelling on Holloway Lane and the wider road network in West Drayton and this part of outer London; and
- The opportunity to install an electric vehicle charging hub in line with the Government's objectives to reduce reliance on fossil fuels and decrease CO₂ emissions which are also reflected in the Development Plan.

Planning Policy

8.8 A detailed evaluation of the planning policies relevant to this planning application is provided in Section 5 of this Statement. However, in summary the following policies are of particular relevance to the Design and Access Statement and inform this report:

- Paragraphs 8, 92, 112, 126, 130, 132 and 134 of the National Planning Policy Framework (updated 2021); and
- London Plan Policies, GG2, D1, D2, D3, D4 and D5.

Design Considerations

Use

8.9 The proposed development is for the addition of an EVC hub at an existing petrol filling station.

8.10 The existing petrol filling station is sui generis use, and the petrol filling station is a long-established use on site. Accordingly, the principle of the addition of EVC to the existing site is acceptable in planning policy terms considering the wider established use and the context of the site.

Layout

- 8.11 The proposed layout of the scheme is shown on the accompanying planning application drawings. The layout remains as existing but with the addition of an EVC hub to meet the evolving needs of the motorist. The layout has been carefully considered and there will be no impacts arising from the addition of EVCs to the site. There is no impact on the Green Belt as the proposals have no adverse impact on the openness of the site as they largely replace existing structure and within the hardstanding area of the site.

Scale

- 8.12 The EVC hub is of an appropriate scale and complementary to the existing use on the site. The proposal is therefore appropriate to its location and accords with design policies.

Appearance

- 8.13 The design of the EVC hub is practical and designed to meet the needs of the users whilst also respecting the character of the site (a petrol filling station) and wider area.
- 8.14 The proposal is of a high quality and functional design, whilst respecting the site boundaries. It is considered to accord with the NPPF and Local Plan Policy.

Materials

- 8.15 The proposed materials are shown on the Proposed Layout and Elevations and reflect the modern and functional requirements of a petrol filling station and EVC.

Community Safety

- 8.16 Consideration has been given to creating an attractive safe environment through the development of a high quality public realm with a parking area which is largely overlooked by the proposed building and this will continue to be the case with the addition of the EVC hub.

Landscaping

- 8.17 The proposal only affects a very small area of shrub land adjacent to the substation and existing EVC space with the other areas of landscaping and boundary treatments retained. There will be no adverse effect on landscaping arising from the proposal.

Accessibility

- 8.18 The applicant is committed to a policy of equality, inclusion and accessibility for those who live and visit the site and has strived to exceed all required standards and achieve a development which promotes inclusion and accessibility.
- 8.19 The provision of an accessible and inclusive environment has been an integral theme throughout the design process, from its initial conception to its current form. The concept of inclusive design seeks to remove barriers which create undue effort, separation or special treatment which enables everyone to participate equally regardless of gender, disability or age.
- 8.20 The use of the site as a petrol filling station is well-established, as demonstrated by the site's planning history. The current access arrangements are also well-established. The provision of an EVC hub will not change the existing arrangements.

Inclusive Access

- 8.21 In respect to inclusive access, all of the petrol filling station operators agree that it is not merely physical barriers that can cause difficulties for customers. Employees of all the major national chains receive Disability Awareness Sessions as part of their basic training, to understand the challenges customers with disabilities may face, and to ensure that their needs are met.
- 8.22 For operational and design reasons the site will remain level, with level access provided to the facilities, including clearly marked pedestrian area to and from the car parking area. Services are therefore provided with access that meets the needs of those who are less able bodied, as well as those with pushchairs.

Conclusion

- 8.23 The proposal responds positively to the site's opportunities and constraints, and consideration has been given to layout, scale, appearance and landscaping. Access to and within the site has been carefully reviewed. It is considered that, based on the above, an appropriate and site sensitive design solution has been found to provide an EVC hub alongside the existing petrol station, which accords with planning policy at national and local level.

SECTION 9: CONCLUSIONS

- 9.1 This Planning Statement, also incorporating the Design and Access Statement, has been prepared on behalf of Shell UK Oil Products Limited and is submitted in support of an application for full planning permission for the provision of an EVC hub and associated works with the remainder of the site remaining as existing at Shell West Drayton, Holloway Lane, West Drayton, UB7 0AE.
- 9.2 The National Planning Policy Framework identifies the need for planning positively for sustainable development and embracing the opportunity to support solutions which offer reductions in greenhouse gas emissions. This is further reiterated in the Development Plan in terms of principles, with specific reference supporting EVC provision at petrol stations.
- 9.3 This proposal provides the opportunity to meet targets for greenhouse gas reduction from road transport, improving air quality standards and increasing the use for alternative fuels by domestic drivers. It is hoped that with the provision of additional infrastructure on the highway network, the uptake of electric vehicles will continue to increase with the associated environmental benefits.
- 9.4 The proposal represents an addition to the existing facilities on the site to meet changing motorists' and environmental needs. Whilst the site continues to be in a functional use, it offers significant environmental benefits and meets modern standards expected by motorists.
- 9.5 The proposal has been considered against the relevant planning policy and it is considered to be in accordance with the Development Plan. Material considerations, in the form of the National Planning Policy Framework and general climate change policy weigh heavily in favour of the development, supporting the installation of technology for low carbon alternative fuel technologies.