



ELG Planning

01325 469 236

info@elgplanning.co.uk

Gateway House, 55 Coniscliffe Road,
Darlington, Co. Durham, DL3 7EH

Chris Wai-Hing Tse MRTPI
Senior Planning officer – Central and South
Planning and Sustainable Growth
Residents Services
Civic Centre (3N/02)
Hillingdon Council

25th March 2025

Dear Mr Wai-Hing Tse,

RE: RESPONSE TO HIGHWAYS COMMENTS IN RELATION TO APPLICATION REF. 68023/APP/2026/349 AT 360 STOCKLEY CLOSE, WEST DRAYTON, UB7 9BL.

We write to set out our response to the Highway Authority comments received 18.03.26 with regard to the above application, which stated:

“The Highway Authority (HA) has reviewed the submitted plans. The applicant has not provided any supporting information such as a Transport Statement, Design and Access Statement, or even a covering letter to explain the operational purpose of the proposed works. As a result, there is no evidence to demonstrate how the development complies with adopted transport and parking policies or how the scheme would operate without generating impacts beyond the existing lawful use of the site.

Based on the limited information contained within the application form, the proposal consists of:

- *Erection of an external car wash bay*
- *Creation of an external storage/waste hold*
- *Installation of 15 EV charging posts and 5 wall-mounted EV chargers (total 20 active charging points)*
- *An increase in on-site parking from 67 spaces to 88 spaces (a net increase of 21 spaces)*

No justification has been provided for the significant uplift in car parking provision. The application does not demonstrate:

- *How the increased parking quantum complies with London Plan (2021) maximum parking standards and Local Plan Part 2 Policy DMT 6.*
- *The operational need or site-specific rationale for 21 additional spaces.*
- *How the introduction of a car wash bay and extensive EV charging infrastructure would alter trip generation, circulation, servicing, or vehicle dwell times on the site.*



England & Lyle Ltd trading as: ELG Planning

VAT Registration No. 660033965
Registered in England No. 3409505
Registered address: Gateway House (as above)

www.elgplanning.co.uk

- *Whether the layout accommodates safe pedestrian movement, appropriate vehicle tracking, or segregation of customer/operational vehicles.*

In the absence of a Transport Statement or technical justification, the HA cannot understand the purpose, intensity, or impact of the proposals, nor confirm that the development remains compliant with adopted transport policy.

Until the above information is submitted, the HA is unable to reach an informed or evidence-based judgement on the acceptability of the scheme.

Recommendation:

The HA is unable to support this application due to the substantial lack of transport and parking information required to assess the impact of the proposals. The applicant has failed to demonstrate compliance with:

- *London Plan (2021) – Transport Policies (maximum parking standards and car park management)*
- *Hillingdon Local Plan Part 2 Policies including DMT 1, DMT 2, and DMT 6 (transport impacts, safe operation of the highway network, and parking standards)*
- *NPPF 2025 – Transport Section (requirement for safe and suitable access for all users and evidence-based assessment of transport impacts)*

Accordingly, the proposal is contrary to the above policies and cannot be supported in its current form.”

We would respond to the comments as follows:

Parking Arrangements

As set out in our submitted covering letter, the application proposals at 360 Stockley Close will help deliver a tailored approach in meeting Tesla’s operational needs, facilitating their proposed use of the site which is largely for the repair and servicing of Tesla vehicles.

On this basis, in order to make most efficient use of the site in supporting such operations, there are 20no. additional parking bays proposed within the associated service yard in place of the existing servicing area for larger vehicles used by the original consent, resulting in 37no. spaces overall in the service yard. These bays are for the use of Tesla only (not for public use) and will be used for securely storing vehicles which are being repaired and/or serviced at the site. The demarcation of the parking bays is simply included to support the consented operation. As such, it is considered that the proposed provision of additional parking bays within the existing service yard falls under the requirement to deliver sufficient space for servicing and manoeuvring, as required by Policy DMT1 and the parking standards set out in the Local Plan Part 2 (LPP2), rather than parking provision *per se*.



The provision of 50no. parking spaces (including 2no. disabled bays) within the customer parking area will remain as existing, as originally consented. The proposals will therefore remain compliant with Policy DMT6 of the LPP2 in reflecting Transport Policy in the London Plan (2021).

Proposed Car Wash Bay

The proposals include the provision of a car wash bay in the service yard area of the application site. As above, the car wash bay will be for the use of Tesla only and will support the intended use of the site for the servicing and/or repair of Tesla vehicles; it will not be available for use by any external persons. As such, it is clear that the provision of a car wash bay at the site will not result in any increased trip generation or issues in relation to circulation, servicing or dwell times, being entirely ancillary to Tesla's proposed operation of the site. Therefore, there would be no unacceptable highways impacts in this regard.

Proposed EV Charging Infrastructure

The site, as existing, has 7no. EV charging bays situated near to the site entrance in the customer car parking area. As part of the proposals, 5no. regular Tesla post-mounted chargers will be installed onto existing posts: 2no. of these will be used to charge Tesla Test Drive cars and 3no. will be for the use of Tesla customers visiting the site. Therefore, there will be no increase in EV charging infrastructure in the customer car park and the proposals will remain compliant with LPP2, Policy T6 of the London Plan and the wider aims of the NPPF in supporting the use of electric vehicles and delivering sustainable transport.

There are 4no. double post-mounted chargers proposed in the service yard area for operational purposes, enabling vehicles that are being repaired/serviced by Tesla on site to be charged whilst being securely stored.

Nonetheless, we would highlight that the provision of the EV charging infrastructure would benefit from permitted development rights and has been included within this application for completeness so that the proposals can be assessed as a whole. Considering that they are now a requirement for most new development and have significant policy support in meeting the challenges of climate change, we hope this element can be supported.

Safe Pedestrian Movement

Pedestrian movement throughout the site will largely remain as per the existing arrangements, with any additional parking bays clearly marked and clear signage to maintain a high level of pedestrian safety and convenience, in accordance with LPP2 Policy DMT2.

Summary

As set out above, the proposals clearly comprise modest additions to the existing site at 360 Stockley Close which will facilitate the proposed occupation of the site by Tesla.



To confirm, the proposals include the provision of an additional 20no. parking bays with 4no. double post-mounted EV chargers within the existing service yard for the operational use of Tesla only. The parking provision within the customer car park will remain as existing (50no. spaces overall) with 5no. of the existing EV charging posts being replaced with regular Tesla post-mounted chargers for the use of customers and Test Drive vehicles. The maintained provision of EV Charging infrastructure at the site is widely supported in planning policy and, in this case, also falls under permitted development rights and does not require planning permission; nonetheless, the proposed EV Chargers have been included within this application for completeness.

The proposed external wash bay within the site's existing service yard is also for the use of Tesla only, for the purposes of repairing and servicing their vehicles. Additionally, safe and convenient pedestrian access will be maintained throughout the site.

It is clear from the reasons set out within this letter that the proposals would not result in unacceptable impacts to highway safety or any cumulative impacts which would be severe. As such, the proposals are considered acceptable with regards to highways matters.

I trust the above is sufficient in satisfying the comments raised. Should you have any further queries, please do not hesitate to contact me. Our client is keen to progress with the proposed works at the earliest opportunity, so if there is anything else required, we will do our best to help.

Yours sincerely,



Mollie Cubbin, MPlan (Hons)
Planner

