



Planning, Design and Access Statement

Land at Stockley Park Golf Club

Tesla Motors Ltd

CRM.3030.031.PL.R.001

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Planning, Design and Access Statement

Project	Land at Stockley Park Golf Club
For	Tesla Motors Ltd
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Contents

1	Introduction.....	1
1.1	Introduction.....	1
1.2	Report Structure.....	1
1.3	Planning Application	2
2	The Need for Electric Vehicle Charging Infrastructure.....	3
2.1	Climate Emergency	3
2.2	Need for EV Charging Infrastructure.....	5
2.3	Existing Local Coverage & Demand for New Charging Infrastructure.....	7
2.4	Greater London Ultra Low Emission Zone (ULEZ)	9
3	Site and Surroundings	10
3.1	Site Location	10
3.2	Site Description.....	10
3.3	Access.....	11
3.4	Environmental Considerations	12
3.5	Planning Constraints.....	13
3.6	Planning History	13
4	Proposed Development.....	15
4.1	Introduction.....	15
4.2	Site Layout.....	15
4.3	Hard and Soft Landscaping	16
4.4	Lighting.....	17
4.5	Grid Connection Cabling	17
4.6	Appearance and Scale	17
4.7	Access.....	19
5	Planning Policy Context.....	20
5.1	Introduction.....	20
5.2	Local Plan Policy	20
5.3	National Planning Policy	23
5.4	Planning Practice Guidance (PPG)	24
6	Green Belt Assessment.....	25

6.2	Compliance with NPPF Paragraph 155	26
7	Planning and Environmental Assessment	28
7.1	Sustainable Development.....	28
7.2	Principle of Development - EV Charging Hub.....	28
7.3	Design and Impact on Character	29
7.4	Transport and Access	30
7.5	Ecology	30
7.6	Arboriculture.....	31
7.7	Flood Risk and Drainage.....	31
7.8	Noise.....	32
7.9	Heritage	32
7.10	Geo-environmental	33
8	Conclusion	34

Figure and Tables

Table 1	Title.....	2
Figure 1	- Existing EV Charging Facilities near the Site (Site denoted by red star)	8
Figure 2	- Greater London ULEZ Area [Site location identified by black marker]	9
Figure 3	- Aerial image of site location	10
Figure 4	- Image of site from existing access road(looking east)	11
Figure 5	- Image of Existing Site Access	12
Figure 6	- Local Plan Policies Map [Site Location denoted by Red Star]	13
Table 2	Planning History of the Site.....	14
Figure 7	- Proposed Site Layout.....	16
Figure 8	- Example Tesla V4 Superchargers.....	18
Figure 9	- Example Substation.....	18
Figure 10	- Example Tesla Megapack.....	19

1 Introduction

1.1 Introduction

- 1.1.1 Enzygo have been instructed on behalf of our client, Tesla Motors Ltd [‘The Applicant’], to submit a full planning application to the London Borough of Hillingdon in respect to Land at Stockley Park Golf Club, Hayes, Uxbridge, UB11 1AQ (thereafter referred to as ‘the site’).
- 1.1.2 The description of development is as follows:
- “Development and operation of an electric vehicle ultra-rapid charging hub – comprising chargepoint upstands, supporting electrical equipment including substation and cabinet infrastructure, hard and soft landscaping, grid connection cabling, Tesla BESS Megapack and lighting.”*
- 1.1.3 The proposed development will provide a Tesla electric vehicle (EV) ultra-rapid (150kw+) charging hub [universally compatible for standard European sockets – CCS2 Connectors ‘Combined Charging System’] on land at Stockley Park Golf Club.
- 1.1.4 The site falls within the administrative boundary of the London Borough of Hillingdon at Stockley Park Golf Club, located within the Stockley Park Business Park. The site is located within proximity to both the A408 and M4, which are key strategic routes leading into Central London, and towards Heathrow Airport which is approximately 4km south of the site. It’s proximity to these key transport routes, and the business park make the site well suited to an EV charging hub for both commuters and other EV drivers who require convenient en-route charging.
- 1.1.5 The proposed development would strengthen the existing public EV infrastructure to support the increasing usage of EVs. EV charging points form vital infrastructure in facilitating the transition to ultra-low emission vehicles and securing the UK Governments’ net zero carbon targets for the transport sector.
- 1.1.6 The site location is shown in drawing CRM3030028-ENZ-XX-XX-DR-T-0004 – Site Location Plan which is appended at Appendix A.

1.2 Report Structure

- 1.2.1 This Planning Design and Access Statement (PDAS) is divided into the following sections:
- Chapter 1: Introduction
 - Chapter 2: The Need for EV Charging Infrastructure
 - Chapter 3: Site and Surroundings
 - Chapter 4: The Proposed Development
 - Chapter 5: Planning Policy
 - Chapter 6: Planning Assessment

- Chapter 7: Environmental Impacts
- Chapter 8: Conclusion

1.3 Planning Application

1.3.1 Table 1 below lists the plans and documents that have been submitted as part of this planning application.

Table 1 Submitted Documents

Title	Reference
Planning Design and Access Statement	CRM.3030.031.PLR.001
Flood Risk Statement and Drainage Strategy	CRM.3030.031.HY.R.001.A
Ecological Impact Assessment	CRM.3030.031.EC.R.001
BNG Metric	CRM.3030.031.EC.R.002
Arboricultural Impact Assessment and Method Statement	CRM.3030.031.ENZ.XX.00.RP.AR.45.101
Phase 1 Geo-environmental Report	CRM.3030.031.GE.R.001.B
Heritage Statement	P00364.01.01.A
Noise Impact Assessment	CRM.3030.031.NO.R.001
Lighting Details	
Plans and Drawings	
Site Location Plan	CRM3030031-ENZ-XX-XX-DR-T-001
Site Layout Plan	CRM3030031-ENZ-XX-XX-DR-T-002
Soft Landscaping Plan	CRM3030031-ENZ-XX-XX-DR-Z-001
Tesla Megapack Data Sheet	
Tesla V4 Supercharger Datasheet	
Tesla V3 Supercharger Cabinet Datasheet	
Substation Elevations	SO_22416
LV Feeder Pillar Detailed Drawings	ETES32A8WEVFPIDNO

2 The Need for Electric Vehicle Charging Infrastructure

2.1 Climate Emergency

- 2.1.1 The 'Climate Change Act 2008' brought in the legislative basis for the United Kingdom to reduce net greenhouse gas emissions by at least 80% by 2050 from their 1990 levels.
- 2.1.2 The target included in the 'Climate Change Act 2008' was strengthened in June 2019 to be a 100% reduction relative to 1990 levels by 2050 (known as "net zero").
- 2.1.3 The clear and explicit need to introduce a step change in how the UK reacts to Climate Change has been recognised by UK Parliament who, on 1st May 2019, declared an Environmental and Climate Change Emergency¹.
- 2.1.4 Despite the overall decline, the transport sector remains the UK's largest emitter of GHGs. In 2023, domestic transport emissions decreased by approximately 1.4%, reaching an estimated 112 million MtCO₂e. This marks a 27% reduction compared to 2005 levels.
- 2.1.5 Road transport is the primary contributor, accounting for 91% of transport emissions. Within this category, cars are the most significant source, responsible for 52% of emissions. Heavy Goods Vehicles (HGVs) and vans contribute 19% and 16%, respectively.
- 2.1.6 The adoption of electric vehicles (EVs) is gradually impacting emission trends. In 2023, the number of battery electric vehicles (BEVs) in use increased by nearly 47.3% compared to 2022, totalling 960,896 cars. This growth contributed to a 2.1% decline in average car CO₂ emissions.
- 2.1.7 The UK's Climate Change Committee (CCC) has highlighted the transport sector as a critical area requiring accelerated action to meet net-zero targets. In its **2024 Progress Report to Parliament** ² and the Seventh Carbon Budget, the CCC emphasised the necessity of a rapid transition to electric vehicles (EVs) and the implementation of supportive policies to reduce emissions effectively. The CCC projects that by 2040, 80% of cars, 74% of vans, and 63% of heavy goods vehicles (HGVs) on UK roads should be electric. Achieving these targets necessitates a significant increase in EV sales, with expectations that new EVs will comprise 95% of car and van sales by 2030 and reach 100% by 2035.
- 2.1.8 The CCC emphasises the importance of expanding charging infrastructure in order to support the transition from petrol and diesel cars to electric vehicles.
- 2.1.9 Reflecting this, the UK Government has introduced a number of policies and initiatives aimed at cutting exposure to air pollutants, improving local air quality and reducing

¹ <https://www.london.gov.uk/programmes-and-strategies/environment-and-climate-change/climate-change/london-climate-action-week-events/responding-climate-emergency-role-parliament#:~:text=On%201%20May%202019%20the,to%20declare%20a%20climate%20emergency.>

² <https://www.theccc.org.uk/publication/progress-in-reducing-emissions-2024-report-to-parliament/>

greenhouse gas emissions. In August 2021, the Government announced plans to accelerate the phasing out of petrol and diesel cars. This will involve:

- Sales of new petrol and diesel cars and vans will be phased out by 2030 (now 2035);
- New cars and vans have to be fully zero emission at the tailpipe from 2035;
- Between 2030 and 2035, new cars and vans can only be sold if they have the capability to drive a significant distance with zero emissions (for example, plug-in hybrids or full hybrids).

2.1.10 At a local level, the London Borough of Hillingdon are proactively tackling the climate emergency. The Hillingdon Strategic Climate Action Plan was adopted in July 2021³ which sets the overarching plan to respond to the climate emergency and commits the Council to become climate neutral by 2030. Objective C8 of the plan sets aims to develop an EV charging action plan and commitments to increase the availability of EV charging points across the borough.

2.1.11 The '**Clean Growth Strategy**' was published by the Department for Business, Energy and Industrial Strategy ("BEIS") in October 2017⁴. The Strategy sets out how it envisages the delivery of the clean, green economic growth needed to combat global warming. It identifies the policies necessary to drive a significant acceleration in the pace of the UK's decarbonisation to achieve the 2032 carbon budget targets that in turn will keep us on track to achieve the net zero target by 2050.

2.1.12 One of the key focusses of this strategy is to develop one of the best EV charging networks in the world. This includes investing £80 million, alongside £15million from Highways England to support charging infrastructure deployment. However, it is stated that significant investment from the private sector is needed to aid this transition.

2.1.13 The Government published its '**Net Zero Strategy: Build Back Greener**' in October 2021⁵ which sets out how the UK Government plans to deliver its emissions targets of Net Zero in 2050 and a 78% reduction from 1990 to 2035 (-63% relative to 2019). It puts forward an achievable and affordable vision that will bring net benefits to the UK.

2.1.14 Whilst there are a range of ways in which net zero could be achieved in the UK, the Strategy sets out a delivery pathway showing indicative emissions reductions across sectors to meet targets up to the sixth carbon budget (2033-2037).

2.1.15 One of the key transport policies set out in this strategy is £620 million for zero emission vehicle grants and EV infrastructure, with a particular focus on providing local and on street charging facilities for EVs.

³ [strategic-climate-action-plan](#)

⁴ <https://www.gov.uk/government/publications/clean-growth-strategy>

⁵ <https://www.gov.uk/government/publications/net-zero-strategy>

- 2.1.16 The UK Government published the report, '**Building a Comprehensive and Competitive Electric Vehicle Charging Sector That Works for All Drivers**' in July 2021⁶, which evaluates how the EV charging infrastructure sector is developing and whether the sector left to its own devices can deliver what is needed. While some parts of the sector are developing relatively well (such as rapid charging at destinations like shopping centres and charging at home or work), other parts are lagging behind.
- 2.1.17 The Report found that in order for the transition to EVs to happen and be sustained, it is essential that there is a comprehensive and competitive EV charging network in place. If the charging network is perceived as inadequate, that will be a major barrier to EV take-up.
- 2.1.18 There will also need to be a suitable mix of different types of charging spread across the UK. While many people will regularly charge at home or work (if they can), a sufficient range of public charging is important to encouraging EV-take up.
- 2.1.19 The **UK Electric Vehicle Infrastructure Strategy** (published March 2022)⁷ was commissioned due to concerns around the growing disparity between the number of EV vehicles on the road, and the number of EV charging points across the country. It is feared that EV uptake in the UK would become constrained by the lagging rollout of supporting infrastructure. The pace of rollout is too slow – even the recent surge in charge point deployment is not at a pace consistent with what is needed for a wholly zero emission new car fleet in 2035.
- 2.1.20 The EV Infrastructure Strategy sets out the vision for 2030, stating that the UK government will remove charging infrastructure as both a perceived, and a real, barrier to the adoption of electric vehicles (EVs). EV charging should be cheaper and more convenient than refuelling at a petrol station. **By 2030, the UK government expect there will be a need for around 300,000 public charge points as a minimum in the UK, but there could potentially be a need for more than double that number.**
- 2.1.21 The UK EV Infrastructure Strategy states that the UK Government will consider what further role Planning Practice Guidance (PPG) can have in ensuring the delivery of EV infrastructure is appropriately supported by the planning system.

2.2 Need for EV Charging Infrastructure

- 2.2.1 As set out, in order for the transition to EVs to happen and be sustained, it is essential that there is a comprehensive and competitive EV charging network in place, one that people can trust and they are confident using – much like filling up with petrol or diesel. If this is not the case, and the charging network is perceived as inadequate, or as not offering a fair deal to people, that will be a major barrier to EV take-up.
- 2.2.2 There will also need to be a suitable mix of different types of charging spread across the UK. While many people will regularly charge at home or work (if they can), a sufficient

⁶ <https://www.gov.uk/government/publications/electric-vehicle-charging-market-study-final-report/final-report>

⁷ <https://www.gov.uk/government/publications/uk-electric-vehicle-infrastructure-strategy>

range of public charging is important to encouraging EV-take up. Rapid charging on longer journeys (such as on motorways and in remote areas) and on-street charging at the kerbside (for those without a driveway or garage) will be particularly important.

- 2.2.3 The **UK government's collection of electric vehicle charging infrastructure statistics**⁸ provides detailed insights into the development and distribution of public charging facilities across the country. These statistics are published quarterly and are based on data sourced from the electric vehicle charging platform Zapmap⁹.
- 2.2.4 These statistics are considered in the context of the UK Electric Vehicle Infrastructure Strategy (2022), which aims to provide 300,000 publicly available chargers by 2030.
- 2.2.5 As of 31st January 2026, there were 116,729 public EV charging devices installed in the UK. Against the government target, this would require an increase in public chargepoints by 183,271 by 2030.
- 2.2.6 Of the 116,729 public charging devices installed, 26,557 devices (22%) were rated at 50kW or above, classified as rapid chargers.
- 2.2.7 With increasing consumer demand and the greater availability of electric models, the number of electric cars in the UK is growing at a rapid rate. As of March 2026, the UK has surpassed 1.9 million fully electric cars on its roads, accounting for approximately 5.7% of the nation's total car fleet¹⁰. This marks a significant increase from the 664,148 electric cars recorded at the end of 2022, reflecting nearly a threefold growth in just over four years.
- 2.2.8 As electric car sales continue to rise so does the demand for electric charging in the UK. Most early adopters primarily relied on home EV charging (some people still do), but with more people making the switch to EVs, there is a real need for more accessible public charging points. The continual increase reinforces the need for a reliable EV charging network within the Borough and across the UK. As such, the proposed development would strengthen the existing infrastructure on the strategic road network to support the increasing usage of electrical vehicles. Electrical vehicle charging points form vital infrastructure in facilitating the transition to ultra-low emission vehicles and securing the UK Government's net zero carbon targets.
- 2.2.9 A good supply and distribution of EV charging points is essential to encourage more drivers to purchase electrical vehicles and use them on a day-to-day basis. Specifically, locating charging points on major highways and arterial routes near convenient and desirable amenities, such as the proposed location. En-route charging points are currently the 4th most prevalent type of charging point – behind 'destination', 'on-street' and 'other', accounting for 6.9% of all EV chargers¹¹.

⁸ <https://www.gov.uk/government/collections/electric-vehicle-charging-infrastructure-statistics>

⁹ <https://www.zap-map.com/>

¹⁰ [UK ev market share 2026: latest electric car registration stats | zapmap](#)

¹¹ <https://www.gov.uk/government/statistics/electric-vehicle-public-charging-infrastructure-statistics-april-2024/electric-vehicle-public-charging-infrastructure-statistics-april-2024>

2.3 Existing Local Coverage & Demand for New Charging Infrastructure

- 2.3.1 An online review of Zapmap, an online source which shows a map of publicly available EV charging infrastructure, indicates that there is a severe lack of ultra-rapid charging services in the area. The development would therefore play an important role in reducing functional barriers to EV travel in the Borough of Hillingdon and the UK.
- 2.3.2 Figure 1 below shows the existing EV charging provision in the area surrounding the site. Currently there are no rapid or ultra-rapid EV charging points within Stockley Park Business Park, or even in neighbouring streets. The nearest rapid/ ultra rapid chargers are located at West Drayton Service Centre approximately 1.23km west of the site.

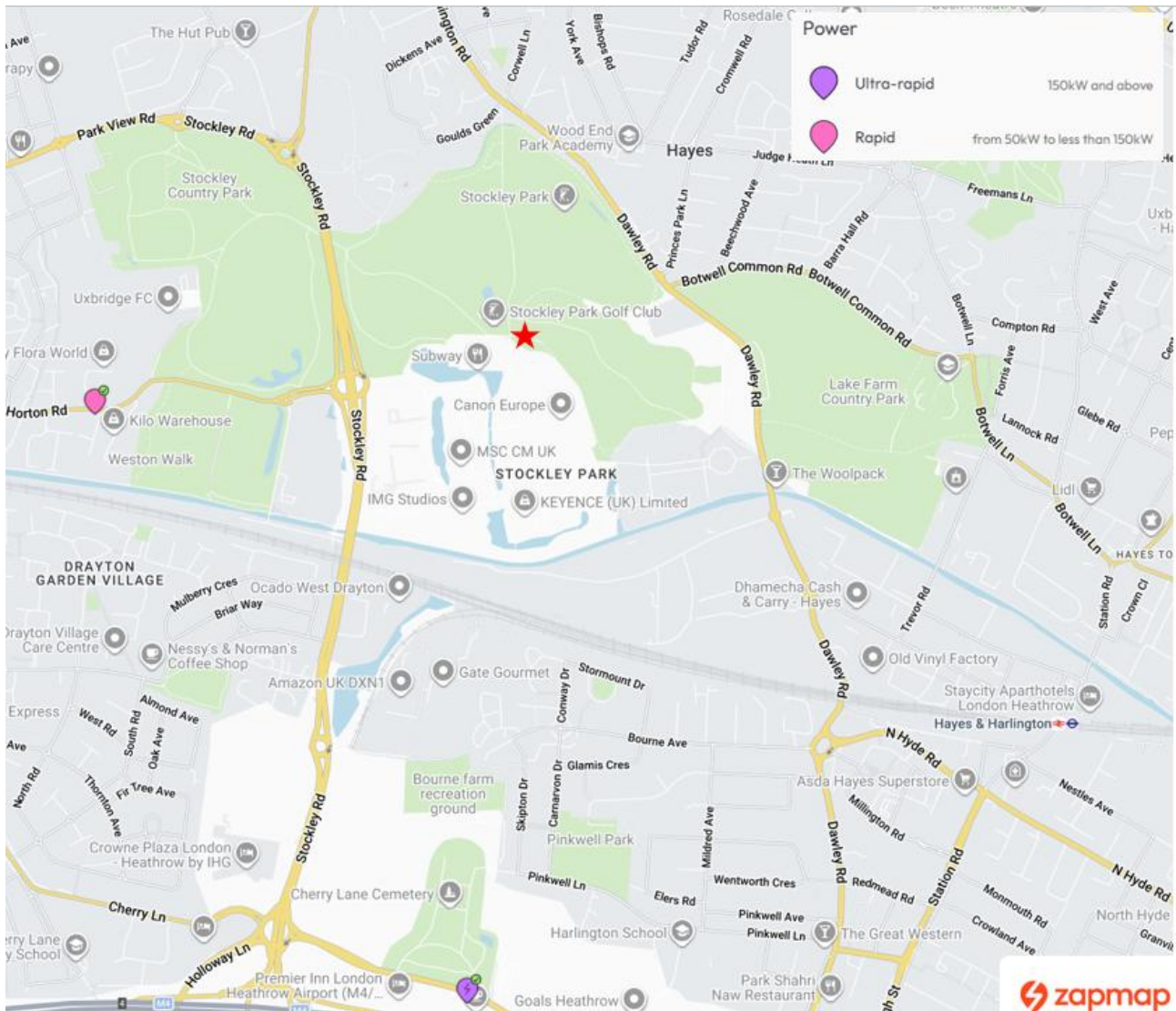


Figure 1 - Existing EV Charging Facilities near the Site (Site Denoted by Red Star)

- 2.3.3 The London Borough of Hillingdon Electric Vehicle Infrastructure Strategy¹² published in July 2023 outlines the Council's strategy. Following a review of guidance and local data, the Council identified that there is an increasing demand for 'destination' type EV charge points within its off-highway owned property. Therefore, the council has decided that its primary objective shall be the introduction of 'destination' type EV Chargepoints of over 50kW on/ off-highway Council owned property.
- 2.3.4 The strategy also recognises the benefits of private concession EV charging facilities. The long-term delivery plan (by 2030) sets a target of 300 50kW chargers for destination locations e.g. hotels, restaurants, car parks, shopping centres and some large workplaces.

¹² [Hillingdon_Council_Electric_Vehicle_Infrastructure_Strategy \(1\).pdf](#)

2.4 Greater London Ultra Low Emission Zone (ULEZ)

2.4.1 On the 29th August 2023 the London ULEZ was expanded as part of Greater London's efforts to combat air pollution and tackle the climate emergency. The Site is located within the ULEZ as shown in Figure 2 below, which means that drivers of vehicles that do not meet the emissions standards (e.g. cars, motorcycles, vans and specialist vehicles up to and including 3.5tonnes) inside the ULEZ face a daily charge, including residents of the ULEZ.

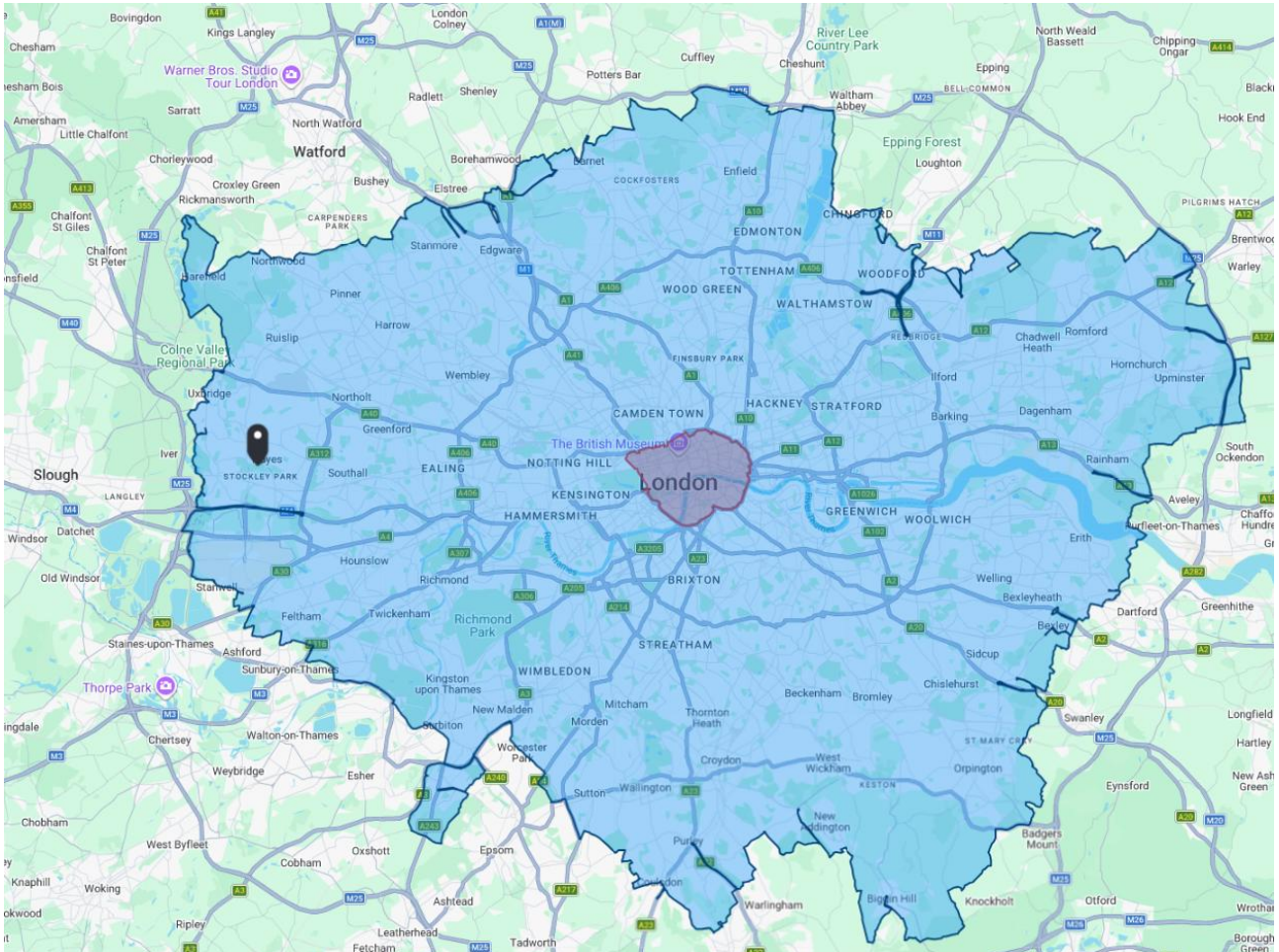


Figure 2 – Greater London ULEZ Area [Site Location Identified by Black Marker]

2.4.2 As polluting vehicles will be charged a rate for entering into the ULEZ, it is expected that users will continue to be encouraged to make the switch to less polluting vehicles – such as EVs or plug-in hybrids. As this Planning Statement sets out, there is a notable lack of ultra-rapid EV charging infrastructure within the Stockley Park area. Therefore, it is important that the ULEZ expansion is supported by an increase in charging facilities, as it is expected that demand will continue to increase in the coming years.

3 Site and Surroundings

3.1 Site Location

- 3.1.1 The application site lies within the administrative boundary of the London Borough of Hillingdon on land at Stockley Park Golf Club, Hayes, UB11 1AQ.
- 3.1.2 The application site is situated at Grid Reference 508144 (X), 180487 (Y). A site location plan has been submitted with this application, **Error! Reference source not found.** below shows an aerial image of the site.

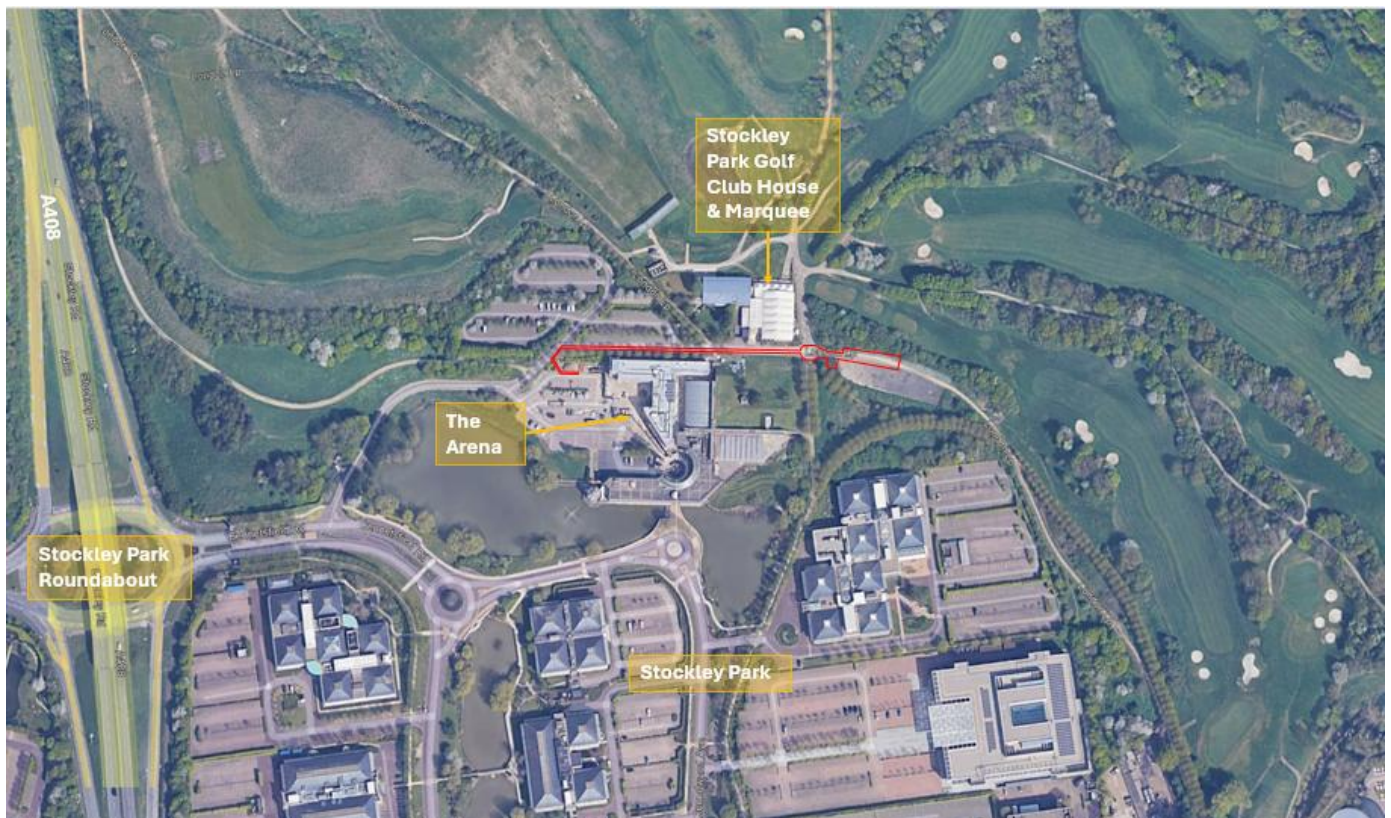


Figure 3 – Aerial Image of Site Location

3.2 Site Description

- 3.2.1 The site is located within the grounds of Stockley Park Golf Club in Uxbridge, Middlesex, to the east of the Stockley Marquee which is an events space used as part of the Golf Club. The site comprises a gravel surface, existing paved access road and areas of vegetation as shown in Figure 4 below.



Figure 4 – Image of Site From Existing Access Road (looking east)

- 3.2.2 As shown on **Error! Reference source not found.**, the surrounding area is characterised by a mix of uses, to the north is Stockley Park golf course, an 18-hole golf course with driving range, clubhouse bar, restaurant and event space. To the south is Stockley Park, a large business park home to several office buildings, lakes and car parks. The site is located approximately 100m northeast of 'The Arena', which is an area of the business park comprising a mix of uses including a hotel, cafe, and a gym.

3.3 Access

- 3.3.1 The site will utilise the existing vehicular access from the unnamed access road which runs through the car park to the Golf Club, between the Travelodge and Clubhouse buildings (see Figure 5). The unnamed road connects to Bennetsfield Road, which runs through Stockley Park business park and joins the wider highway network at the Stockley Park roundabout junction.
- 3.3.2 A section of the London Loop long distance walking path runs through the site along the southern boundary. Access to the walking route will be maintained enabling pedestrian access through the site during construction and operation.



Figure 5 – Image of Existing Site Access

3.4 Environmental Considerations

Ecology

- 3.4.1 The site is not located within or near any sites designated for ecological conservation, the nearest site would be the South West London Waterbodies Special Protection Area (SPA) and Ramsar which is located over 7km south west of the site.

Landscape

- 3.4.2 The site is not located within or within the setting of any National Landscapes.

Hydrology

- 3.4.3 The Environment Agency Flood Risk Map for Planning identifies that the site is located entirely in Flood Zone 1 and is therefore at low risk of flooding from rivers or surface water.

Heritage Constraints

3.4.4 The site is located within a Grade II listed park and garden, Stockley Park: Business Park Phases I and II and country park and golf course (listing reference: 1466074). There are no listed buildings within or adjacent to the site.

Sensitive Human Receptors

3.4.5 The nearest sensitive human receptors are located approximately 100m west of the site at the Travelodge at The Arena.

3.4.6 The nearest residential receptors are on Dawley Parade, approximately 450m from the proposed development site. It is considered that these receptors are of a sufficient distance away from the proposal site, so no further assessment is required.

3.5 Planning Constraints

3.5.1 An extract from the adopted London Borough of Hillingdon Local Plan Policies Map (Figure 6 below) shows that the site is located within the London Green Belt. There are no other site allocations or planning constraints impacting the site.

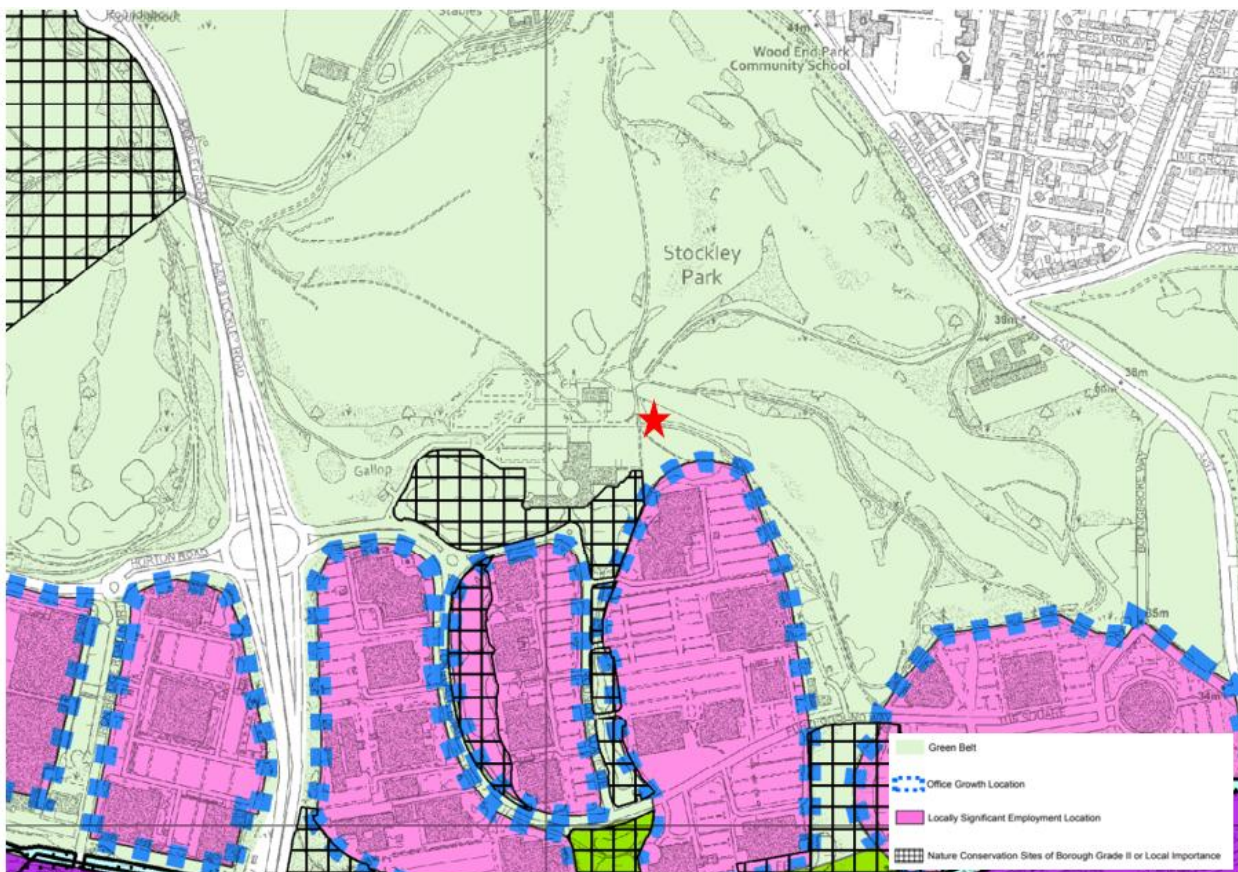


Figure 6 - Local Plan Policies Map [Site Location Denoted by Red Star]

3.6 Planning History

3.6.1 There is no planning history for the site itself, however there are a number of planning applications associated with the wider golf course as set out in Table 2 below. None of these directly impact the area of the golf course that the development is proposed on.

Table 2 Planning History of the Site

Reference	Description of Development	Decision
37850/APP/2008/685	Construction of driving range including extensive landscaping and planting.	Approved 17.09.2008
37850/APP/2011/46	Landscaping of existing golf course including planting, remodelling of landforms, and the enhancement and alteration of paths, greens, practice ground and fairways.	Approved 25.05.2011
37850/APP/2012/2732	Erection of lightweight open fronted driving range enclosure.	Approved 05.11.2012
37850/APP/2012/02743	Provision of a hardstanding area on which to erect a marquee at Stockley Golf Course.	Approved 29.09.2013
37850/APP/2012/2753	Construction of an adventure golf course, together with associated works (outline application with appearance, landscaping and scale reserved)	Approved 13.01.2014
37850/APP/2014/2074	Non-material amendment to planning permission 37850/APP/2012/2732, dated 20/06/2013 (erection of lightweight open fronted driving range enclosure), for alterations to the proposed driving range enclosure.	Approved 13.06.2014
37850/APP/2017/2639	Single storey detached building for use as a reception, curtain walling to ground floor, external seating area, internal alterations, boundary wall and raising of roof to create new floor level.	Withdrawn 05.09.2018
37850/APP/2016/451	Installation of temporary marquee over previously approved concrete base.	No further action 04.07.2025

4 Proposed Development

4.1 Introduction

- 4.1.1 This application relates to the proposed development of Tesla electric vehicle (EV) ultra-rapid (150kw+) charging points [universally compatible for standard European sockets – CCS2 Connectors 'Combined Charging System'], supercharger equipment cabinets, substation infrastructure, Tesla Megapack, ancillary equipment cabinets, grid connection underground cabling, and landscaping.
- 4.1.2 The Tesla Superchargers are fully compatible with other electric vehicles with a standard European socket – expanding the public benefit to support the entire EV market.
- 4.1.3 The Tesla Megapack is a battery storage system, which will help balance electricity supply and demand with the grid, and provide backup power.
- 4.1.4 Within this chapter, the nature of the development and details of the plant and equipment to be located on the site is provided.

4.2 Site Layout

- 4.2.1 The plans accompanying this application show the site layout in detail. The following equipment is located within the red line boundary:
- 12no. Tesla V4 Supercharger parking bays
 - 4no. regular waiting bays
 - 1no. DNO Substation
 - 1no. Tesla Substation
 - 1no. Tesla Megapack
 - LV switchgear pillar
 - Soft and hard landscaping proposals [refer to submitted Soft Landscaping Plan]
 - Underground connection cable

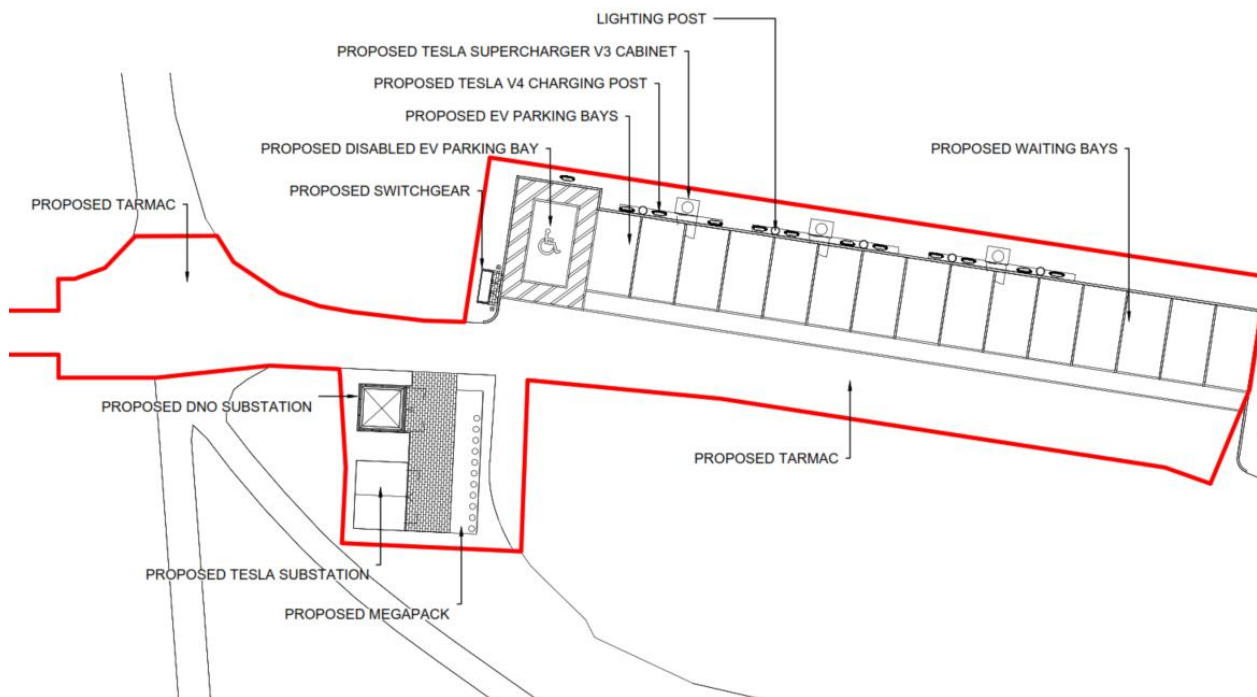


Figure 7 - Proposed Site Layout

- 4.2.2 The 12no. proposed V4 Tesla superchargers are positioned at the rear of the proposed car parking bays, with 1no. disabled parking bay. 4no. regular bays are included as waiting areas should all parking bays be occupied. Three V3 Supercharger cabinets are proposed alongside the EV charging upstands, at the rear of the parking bays
- 4.2.3 A DNO substation, Tesla Substation and Tesla Megapack will be installed to the southwest of the parking area.

4.3 Hard and Soft Landscaping

- 4.3.1 The existing ground beyond the existing paved road will be resurfaced, to create a continuous road surface to the end of the parking area to create a suitable surface for vehicle access, and egress.
- 4.3.2 Vegetation clearance will be required to accommodate the proposed parking area and supporting infrastructure. Soft landscaping comprising of grass will be reinstated around the rear of the bays which will help to reintegrate the site with the existing retained vegetation surrounding the site.
- 4.3.3 The proposed development will not be able to achieve BNG onsite due to site size constraints, therefore offsite BNG credits will be secured by the applicant. The Applicant has received a quote for delivering off-site BNG credits. This can be secured by way of an appropriate BNG Gain Plan condition.
- 4.3.4 The soft landscaping proposals are shown on the Soft Landscape Plan (Ref CRM3030031-ENZ-XX-XX-DR-Z-0001).

4.4 Lighting

- 4.4.1 The proposed development incorporates lighting with the EV charging layout, with columns positioned between EV upstands. Details of the lighting columns have been submitted with the application.

4.5 Grid Connection Cabling

- 4.5.1 The site will connect to the grid at a point of connection with identified capacity within 'The Arena' car park west of the site. The 11kV connection cable will exit the site and be placed underground beneath the existing access road.

4.6 Appearance and Scale

- 4.6.1 The proposed development represents a modest, small-scale intervention that will sensitively transform the existing site into a purpose-built car parking area. The Superchargers are of a minimalist design, featuring a slim, oval form and low-level safety lighting, ensuring a discreet presence within the site. An example of a Tesla V4 Supercharger is shown at Figure 11.
- 4.6.2 Detailed elevations, including the dimensions of each component, have been submitted as part of this application. The chargers, cabinets, substations and Megapack are all limited in scale and have been carefully specified to ensure they are proportionate to their surroundings. Furthermore, while some vegetation will be removed, the retention of existing vegetation and trees along the rear of the site will provide effective screening, allowing the infrastructure to integrate with the established landscape. As such, the development will appear well-contained and of an appropriate scale and appearance within the surrounding environment.



Figure 8 – Example Tesla V4 Superchargers



Figure 9 – Example Substation



Figure 10 – Example Tesla Megapack

4.7 Access

- 4.7.1 Vehicular access to the proposed EV charging area will be provided via the existing access road which runs along the existing car park, adjacent to the south of the clubhouse for the Golf Course.
- 4.7.2 A pedestrian walkway will be demarcated along the front of the parking bays. Existing pedestrian access along the London Loop walking path will be maintained throughout the construction and operation of the development.

5 Planning Policy Context

5.1 Introduction

5.1.1 This chapter considers the proposed development against the relevant local and national policies and other material considerations that are pertinent to the proposed development.

5.1.2 The adopted Local Development Plan relevant to the proposed development comprises:

- Hillingdon Local Plan Part 1: Strategic Policies (adopted December 2012)
- Hillingdon Local Plan Part 2: Development Management Policies (adopted January 2020)
- London Plan 2021

5.2 Local Plan Policy

5.2.1 The adopted Local Development Plan relevant to the proposed development comprises:

- Hillingdon Local Plan Part 1: Strategic Policies (adopted December 2012)
- Hillingdon Local Plan Part 2: Development Management Policies (adopted January 2020)
- The London Plan 2021

5.2.2 Table below outlines the relevant policies from the adopted local development plan.

Policy Document	Policy	Summary
Hillingdon Local Plan Part 1: Strategic Policies	HE1: Heritage	The council will conserve and enhance Hillingdon's distinct and varied environment, its settings and the wider historic landscape.
	BE1: Built Environment	to be well-designed, context-sensitive, inclusive, and environmentally responsible, while enhancing both the character and quality of the borough.
	EM2: Green Belt, MOL and Green Chains	Any proposals for development in Green Belt will be assessed against national and London Plan policies, including the very special circumstances test.
	EM6: Flood Risk Management	The Council will require all development across the borough to use sustainable urban drainage systems (SUDS) unless demonstrated that it is not viable.
	EM7: Biodiversity and	Hillingdon's biodiversity and geological conservation will be preserved and enhanced. Biodiversity improvements are sought from all developments where feasible.

	Geological Conservation	
	EM8: Land, Water, Air and Noise	The council will seek to ensure that noise sensitive development and noise generating development are only permitted if noise impacts can be adequately controlled and mitigated.
Hillingdon Local Plan Part 2: Development Management Policies	DMHB 1 Heritage Assets	Development that has an effect on heritage assets will only be supported where it will not lead to the loss of significance or harm to an asset, unless public benefits outweigh the harm, in accordance with the NPPF.
	DMHB 8 Registered Historic Parks, Gardens and Landscapes	Development within a registered historic park, garden or landscape must respect its character, environmental quality, important views and vistas.
	DMHB 11 Design of New Development	New development must incorporate principles of good design including harmonising with local context, using high quality building materials, protecting features of positive value and landscaping to protecting and enhance amenity, biodiversity and green infrastructure.
	DMHB 12 Streets and Public Realm	Development should be well integrated with the surrounding area to create public spaces that are safe, connected and incorporate principles of inclusive design.
	DMHB 14 Trees and Landscaping	All developments are expected to retain or enhance existing landscaping, trees, biodiversity or other natural features of merit. Proposals affecting existing trees must provide a tree survey. Where trees are to be removed, proposals for replanting of new trees on-site must be provided or include contributions to offsite provision.
	DMEI 4 Development in the Green Belt or Metropolitan Open Land	Inappropriate development in the Green Belt will not be permitted unless there are very special circumstances. Redevelopment in the Green Belt and MOL will be permitted only where the proposal would not have greater impact on the openness of this Green Belt having regard to height, bulk, proportion of the site that is already developed, footprint, distribution and character of existing buildings, visual amenity and character of the Green Belt.
	DMEI 7 Biodiversity Protection and Enhancement	Design and layout of new development should retain and enhance any existing features of biodiversity value within the site. Where development is constrained and cannot provide high quality biodiversity enhancements on-site, then appropriate contributions will be sought to

		deliver off-site improvements through a legal agreement.
	DMEI 10: Water Management, Efficiency and Quality	Applications for all new build developments are required to include a drainage assessment demonstrating that appropriate sustainable drainage systems have been incorporated in accordance with the London Plan.
	DMT1 Managing Transport Impacts	To be acceptable, developments are required to have no significant adverse transport or associated air quality and noise impacts on the local and wider environment, particularly on the strategic road network.
	DMT2 Highways Impacts	Proposals must ensure safe and efficient vehicular access to the highway network.
	DMT5 Pedestrians and Cyclists	Development proposals will be required to ensure that safe, direct and inclusive access for pedestrians and cyclists is provided on the site connecting it to the wider network, including the retention and, where appropriate, enhancement of any existing pedestrian and cycle routes;

The London Plan 2021

5.2.3 The relevant policies from the London Plan are summarised in Table 3 below.

Policy	Summary
D5 Inclusive design	Proposals should achieve the highest standards of accessible and inclusive design. They should be designed taking into account London's diverse population.
D14 Noise	Development proposals should manage noise by: 1) Avoiding significant adverse noise impacts on health and quality of life 2) Reflect agent of change principles
G2 London's Green Belt	Development proposals that would harm the Green Belt should be refused except where very special circumstances exist. Subject to national planning policy tests, the enhancement of the Green Belt to provide appropriate multi-functional beneficial uses for Londoners should be supported.
G6 Biodiversity and access to nature	Developments should manage impacts on biodiversity and aim to secure net biodiversity gain. This should be informed by the best available ecological information.
HC1 Heritage conservation and growth	Development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings.

5.3 National Planning Policy

National Planning Policy Framework (NPPF) December 2024

5.3.1 The National Planning Policy Framework (NPPF) is a material consideration in the determination of planning applications. **Paragraph 8** sets out three 'overarching objectives' to achieve sustainable development and notes that they are interdependent and need to be pursued in mutually supportive ways:

- **Economic Objective** – to help build a strong, responsive, and competitive economy, by ensuring sufficient land of the right type in the right places, to support growth, innovation, and improved productivity.
- **Social Objective** – to support strong, vibrant, and healthy communities, ensuring that a sufficient number and range of homes can be provided.
- **Environmental Objective** – to contribute to protecting and enhancing our natural, built, and historic environment, including making effective use of land.

5.3.2 **Paragraph 117** of the NPPF goes on to advocate for developments to '*be designed to enable charging of plug-in and other ULEV's in safe, accessible and convenient locations*'. The application site is strategically located within proximity to key transport routes, a key employment area; and in an area which is currently lacking in EV charging infrastructure.

5.3.3 **Chapter 13 (Protecting Green Belt land)** confirms the importance of Green Belt land, which seeks to prevent urban sprawl and maintain the openness and permanence of such land.

5.3.4 The **NPPF paragraph 154** provides a list of instances where development in the Green Belt is not considered inappropriate.

5.3.5 **NPPF paragraph 155** introduces the policy term 'Grey Belt' and sets out the planning policy for development proposals within, stating that development in the Green Belt should not be regarded as inappropriate where the following apply:

- a) The development would utilise grey belt land and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan;
- b) There is a demonstrable unmet need for the type of development proposed;
- c) The development would be in a sustainable location, with particular reference to paragraphs 110 and 115 of this Framework; and
- d) Where applicable the development proposed meets the 'Golden Rules' requirements set out in paragraphs 156-157 below

5.3.6 Annex 2 glossary to the NPPF defines Grey Belt land as follows:

Grey belt: *For the purposes of plan-making and decision-making, 'grey belt' is defined as land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in*

paragraph 143. 'Grey belt' excludes land where the application of the policies relating to the areas or assets in footnote 7 (other than Green Belt) would provide a strong reason for refusing or restricting development.

5.3.7 **Paragraph 161** states that *'The planning system should support the transition to Net Zero 2050 and take full account of all climate impacts including overheating, water scarcity, storm and flood risks 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.'* The Development will strengthen EV charging infrastructure in the area, as the Applicant has identified this area as lacking in sufficient ultra-rapid EV charging infrastructure. EV charging points are vital infrastructure in facilitating the transition to ultra-low emission vehicles and securing the Government's net zero carbon targets.

5.3.8 **Paragraph 166** states that *'When determining planning applications for renewable and low carbon development, local planning authorities should not require applicants to demonstrate the overall need for renewable or low carbon energy and recognise that even small-scale projects provide a valuable contribution to significant cutting greenhouse gas emissions approve the application if its impacts are (or can be made) acceptable'.*

5.3.9 **Paragraph 187** also states that proposals should contribute to and enhance the natural and local environment by

"e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans;"

5.3.10 **Chapter 16 (Conserving and enhancing the historic environment)** advises that in determining proposals that affect heritage assets, authorities should describe the significance or any heritage assets affected, including their setting with the level of detail required proportionate to the asset and its importance.

5.4 Planning Practice Guidance (PPG)

5.4.1 Paragraph 001 (Reference ID: 5-001-20140306) states that: *'Increasing the amount of energy from renewable and low carbon technologies will help to make sure the UK has a secure energy supply, reduce greenhouse gas emissions to slow down climate change and stimulate investment in new jobs and businesses. Planning has an important role in the delivery of new renewable and low carbon energy infrastructure in locations where the local environmental impact is acceptable'.*

5.4.2 There is also a specific section on Green Belt, Paragraph 014 (Reference ID: 64-014-20250225) states that *'Footnote 55 to the NPPF sets out that if development is considered to be not inappropriate development on previously developed land or grey belt, then this is excluded from the policy requirement to give substantial weight to any harm to the Green Belt, including to its openness'.*

6 Green Belt Assessment

- 6.1.1 The site is located entirely within the London Metropolitan Green Belt.
- 6.1.2 The NPPF is clear at paragraph 153 that when considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt, including harm to its openness. Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.
- 6.1.3 NPPF paragraph 155 introduces the policy term 'Grey Belt' and sets out the planning policy for development proposals within, stating that:

"The development of homes, commercial and other development in the Green Belt should also not be regarded as inappropriate where:

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

- 6.1.4 Annex 2 Glossary to the NPPF defines Grey Belt land as follows:

*"Grey belt: For the purposes of plan-making and decision-making, 'grey belt' is defined as land in the Green Belt comprising previously developed land and/or **any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in paragraph 143.** 'Grey belt' excludes land where the application of the policies relating to the areas or assets in footnote 7 (other than Green Belt) would provide a strong reason for refusing or restricting development."*

Purpose (a): To check the unrestricted sprawl of large built up areas

- 6.1.5 Unrestricted sprawl is directly related to the sprawl of large built-up areas. The NPPF does not provide a definition of what constitutes "sprawl". It is accepted by the Planning Inspectorate the definitions of "sprawl" often conclude that "land immediately adjacent to the large built-up area is likely to contribute to this purpose as it provides the boundary and zone of constraint to urban expansion."
- 6.1.6 The application site is situated c. 450m southwest of the Hayes settlement boundary. Permanent infrastructure exists in the immediate locality, including Travelodge c. 110m to the southwest of the site, and the Nuffield Health Stockley Park Fitness & Wellbeing Gym c. 61m to the southeast. The installation of EV charging proposals would not conflict with this Green Belt purpose concerning checking unrestricted sprawl, as it would not result in an extension of the physical settlement boundary beyond the existing development. The land that forms this area does not strongly contribute to Purpose (a).

Purpose (b): To prevent neighbouring towns merging into one another

- 6.1.7 The NPPF and updated PPG specifically refers to preventing the merging of towns, not the merging of towns with smaller settlements, or the merging of smaller settlements with each other. The site is located approx. 450m southwest of Hayes settlement boundary. The next closest town is West Drayton which lies c. 1.9km southwest of the site. The development would not lead to the coalescence of these towns. Accordingly, the site does not make a strong contribution to Green Belt Purpose (b).

Purpose (d): To preserve the setting and special character of historic towns

- 6.1.8 Paragraph 143 of the NPPF relates to the preservation of 'setting and special character of historic towns', not individual heritage assets such as listed buildings and scheduled monuments.
- 6.1.9 The site does not form the setting of any historic town and therefore the strategic function of the Green Belt for this purpose (d) would remain.

Footnote 7

- 6.1.10 The site is located within a Registered Park and Garden. This designation falls under the scope of Footnote 7.
- 6.1.11 A Heritage Statement has been undertaken in support of this application. This has concluded that neutral effects on Stockley Park Grade II listed Park and Garden are predicted as a result of the proposed development. Therefore, it can be considered that the site's located within the Registered Park and Garden would not provide a strong reason for refusing or restricting the proposed development.
- 6.1.12 Therefore, it is considered that the site could be defined as Grey Belt for the purpose of NPPF paragraph 155.

6.2 Compliance with NPPF Paragraph 155

- 6.2.1 NPPF Paragraph 155 goes on to state that development in the Green Belt should also not be regarded as inappropriate where:

b) There is a demonstrable unmet need for the type of development proposed.

- 6.2.2 Subparagraph b) requires there to be an unmet need for this type of development. The need case is clear as outlined in section **Error! Reference source not found.** of this report. The Planning Inspector has also previously confirmed that, in light of the government's support for an accelerated change to electric vehicles in pursuit of a transition to zero emissions transport, there is no requirement for the applicants to demonstrate a need for charging infrastructure.

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

- 6.2.3 The proposed development would provide destination-based charging, providing a convenient charging location for visitors to the area, therefore it is anticipated that this will

not result in new trips on the highway. The site is a very short detour from Stockley Road, and located with other attractions such as the Golf Club, The Arena, and offices in Stockley Park, therefore this is a sustainable location.

d) Where applicable the development proposed meets the 'Golden Rules' requirements set out in paragraphs 156-157 below

6.2.4 The Golden rules do not apply to this type of development.

6.2.5 Therefore, in accordance with the provisions of paragraph 155, it is considered that the development could be regarded as not inappropriate in the Green Belt. The PPG is clear that Footnote 55 to the NPPF sets out that if development is considered to be not inappropriate development on previously developed land or grey belt, then this is excluded from the policy requirement to give substantial weight to any harm to the Green Belt, including to its openness. This is consistent with rulings from the courts on these matters that, where development (now including development on grey belt or previously developed land) is not considered to be inappropriate in the Green Belt, it follows that the test of impacts to openness or to Green Belt purposes are addressed and that therefore a proposal does not have to be justified by "very special circumstances".

6.2.6 In accordance with Local Plan Policy DMEI4, the proposed development will not impact upon the openness of the Green Belt in this location. Furthermore, the height of structures will not exceed the surrounding vegetation; the existing area has been subject to modifications and has a strong and legible relationship with the Golf Club and footpaths leading to Stockley Business Park in the south.

6.2.7 The site has a modest footprint and is in keeping with the character of its surrounds which comprises buildings and off-street parking areas, set within a parkland context. The visual amenity of this area of the Green Belt will not be adversely affected by the proposed development; therefore, it is compliant with Policy DMEI4 of the local plan.

7 Planning and Environmental Assessment

7.1 Sustainable Development

- 7.1.1 Paragraph 157 of the NPPF states the planning system should support the transition to a low carbon future in a changing climate. It should help to shape places in ways that contribute to radical reductions in greenhouse gas emissions.
- 7.1.2 The UK EV Infrastructure Strategy (2022), the Climate Change Committee's 2024 Progress Report to Parliament (18th July 2024) and the London EV Strategy are all material considerations in the planning balance for this planning application – all weighing significantly in favour of the development on the grounds that the development would provide much-needed infrastructure to support road transport decarbonisation.
- 7.1.3 The adopted Local Plan and the NPPF are clear on the weight that should be attributed to delivering sustainable development which contributes to reducing harmful emissions. Given that the application seeks to deliver 12 no. EV charging points for electric vehicles, it is considered that the development has the potential to significantly reduce harmful greenhouse gas emissions – which is not only mitigation against climate change but acts to improve local air quality.

7.2 Principle of Development – EV Charging Hub

- 7.2.1 The UK Government has committed to net zero emissions by 2050. Transport is the UK's largest emitting domestic sector and 91% of UK transport emissions come from road transport¹³. If the UK economy is to achieve net zero emissions by 2050, it must decarbonise road transport. As outlined in section 2 of this statement, there is a clear need for EV charging infrastructure in the UK.
- 7.2.2 The UK plans to phase out the sale of new petrol and diesel vehicles by 2035 (pushed back from 2030). This step change will require the infrastructure necessary to support this uptake in EVs, which is currently lacking even coverage across the UK. The recent rapid increase in both the supply of, and the demand for, EVs means that charging infrastructure now stands as the single biggest challenge to decarbonisation. The Climate Change Committee (CCC) published their 2024 Progress Report to Parliament on 18th July 2024¹⁴. The Report stresses that the *"roll-out of charging infrastructure will be crucial to enable EV sales to grow rapidly. 2023 saw strong growth, with around 17,000 new public charge points being added to the network. This growth will need to continue, with annual installation rates needing to reach treble this number by the end of the decade to reach the Government's goal of 300,000 by 2030."*

¹³ <https://www.gov.uk/government/publications/uk-electric-vehicle-infrastructure-strategy>

¹⁴ <https://www.theccc.org.uk/publication/progress-in-reducing-emissions-2024-report-to-parliament/>

- 7.2.3 With increasing consumer demand and the greater availability of electric models, the number of electric cars in the UK is growing at a rapid rate, nearly a threefold increase from 2022 and now at 1.9million fully electric vehicles on UK Roads (as of March 2026).
- 7.2.4 As electric car sales continue to rise so does the demand for electric charging in the UK. The UK Electric Vehicle Infrastructure Strategy (2022)¹⁵ is targeting 300,000 electric vehicle chargers to be made publicly available in the UK by 2030 to support the growth of electric vehicles in the market and the decarbonisation of the UK transport sector.
- 7.2.5 As of 31st January 2026, there were 116,729 public EV charging devices installed in the UK. Against the government target, this would require an increase in public chargepoints by 183,271 over the next 4 years. Of the 116,729 public charging devices installed, 26,557 devices (22%) were rated at 50kW or above, classified as rapid chargers. This shows that there is a clear under provision of EV charging facilities in the UK, particularly ultra-rapid charging.
- 7.2.6 As a destination for visitors of the Golf Club and nearby amenities at Stockley Park Business Park, and also being located near the A408 and M4 corridor, this location is ideally positioned to accommodate an ultra-rapid charging hub. The development would represent a highly sustainable use of an underutilised site, strengthen the EV network along a critical transport corridor, and contribute meaningfully to regional and national decarbonisation goals.
- 7.2.7 Publicly accessible ultra-rapid EV charging infrastructure (100kW+) remains limited in the area surrounding the site. As set out in Section 2, the existing local public charging network particularly near the A408 is inadequate given the high volume of traffic and the critical role the road plays in facilitating the movement of people and goods through the Borough.
- 7.2.8 Importantly, the site falls within Greater London's Ultra Low Emission Zone (ULEZ), where charges apply to non-compliant petrol and diesel vehicles. This scheme is driving the accelerated adoption of electric vehicles which is generating substantial demand for convenient and reliable charging options.

7.3 Design and Impact on Character

- 7.3.1 The proposed development has been carefully designed in accordance with the design-led approach advocated by Policies D3 and D4 of the London Plan. These policies require development to respond positively to local context and character. Positioned on the periphery of a Golf Club and Business Park, the scheme adopts a restrained and contextually appropriate design approach. The EV charging upstands and associated infrastructure are modest in scale and low in height, ensuring that all built elements remain visually subordinate within the wider landscaped setting, particularly in views toward the adjacent golf course. This approach is also consistent with Policy BE1 of the London Borough of Hillingdon Local Plan (Built Environment), which seeks high quality design that respects the character of the surrounding area.

¹⁵ <https://www.gov.uk/government/publications/uk-electric-vehicle-infrastructure-strategy>

- 7.3.2 The site lies within the Stockley Park Grade II Registered Park and Garden. In accordance with Policy HC1 (Heritage conservation and growth) of the London Plan and Policy HE1 (Heritage) of the Hillingdon Local Plan, the proposals have been developed to conserve the significance of this designated heritage asset. Stockley Park is characterised by a planned landscape established in the mid-1980s, comprising office buildings set within extensive areas of managed parkland and associated parking. The proposed development does not result in the loss or alteration of any designed or masterplanned parkland, thereby preserving the spatial composition, landscape structure, and setting of the Registered Park and Garden.
- 7.3.3 In this context, the proposed development is fully compatible with the established character and appearance of the area, in line with London Plan Policy D4 and Hillingdon Local Plan Policies BE1 and DMHB 11 (Design of New Development). The incorporation and retention of soft landscaping, including existing trees and boundary vegetation, will soften the visual presence of hardstanding and built elements, ensuring the development integrates effectively with the surrounding setting.

7.4 Transport and Access

- 7.4.1 The site benefits from existing access via an unnamed road into the Golf Club. This connects to the wider road network at Bennetsfield Road which connects the Business Park to the A408 (Stockley Road).
- 7.4.2 The proposed development is a destination-based charging hub and will predominantly serve drivers visiting the Golf Club and wider Stockley Park Business Park facilities. Therefore, it is not expected to generate new trips or cause any adverse impacts on the wider transport network including the A408 and Bennetsfield Road.
- 7.4.3 In compliance with Local Plan Policy DMT1, the site will be accessible to all people, with dedicated parking bay and level surfacing between the site and nearby amenities ensuring suitable access for disabled people.
- 7.4.4 In terms of pedestrian movements, the route of the London Loop walking path will remain unimpeded throughout the construction and operation of the proposed development.

7.5 Ecology

- 7.5.1 An Ecological Impact Assessment (EcIA) has been prepared and submitted in support of this planning application. There are no designated ecological sites present within or near the site. On-site habitats provide limited opportunities for priority species; therefore, no further surveys are recommended in relation to reptiles, breeding birds and badger.
- 7.5.2 The proposed development will require the removal of some vegetation and trees. Surveys conducted confirm that the trees that will be removed within the site offer negligible suitability for bats due to their age and lack of relevant features for potential bat roosting. On-site habitats provide limited suitability for foraging and commuting Bats.
- 7.5.3 As the site is located within 500m of two potential breeding ponds, eDNA Survey and Habitat Suitability Index was performed at each suitable pond and found that no evidence of GCN.

Biodiversity Net Gain

- 7.5.4 The Applicant submits a BNG Metric calculation. The proposed development will not be able to achieve +10% BNG onsite due to site size constraints, therefore offsite BNG credits will be secured by the applicant. The Applicant has received a quote for delivering off-site BNG credits. This can be secured by way of an appropriate BNG Gain Plan condition.

7.6 Arboriculture

- 7.6.1 In accordance with policy DMHB 14, an accurate Tree Survey has been undertaken and reported in the Arboricultural Impact Assessment (Reference: CRM.3030.031.ENZ.XX.00.RP.AR.45.101) which accompanies this application. The survey, and assessment confirms that the proposed development will require the removal of one category B (moderate value) tree, 13 category C trees (low value) and one category C (low value) tree group to facilitate the development.
- 7.6.2 Policy G7 of the London Plan states that 'existing trees of value' should be retained. The proposed tree removals will result in some amenity loss, however this will not adversely affect the overall landscape value of the wider site. It should also be noted that a significant amount of the existing trees, and tree groups behind the site will be retained and will further preserve the landscape of the area. With the exception of one category B tree, all trees are classified as low-quality Category C and do not present a significant constraint to the proposed development.
- 7.6.3 NPPF paragraph 136 states that planning decisions should ensure that existing trees are retained wherever possible, and Hillingdon Local Plan policy DMHB 14 also states that all developments are expected to retain or enhance the existing landscaping, trees, biodiversity or natural features of merit. As per part B of the policy a hard and soft landscape scheme has been developed which is appropriate to the site design and proposed function. While some trees require removal, the majority of the vegetation which provide amenity value around the site will be retained.
- 7.6.4 The London Plan Policy G7 states that where planning is granted which requires the removal of trees, there should be an adequate replacement based on the existing value the trees removed. Given the size of the site, and nature of the development, no replacement tree planting can be accommodated within the site. The statutory 10% BNG requirement for this application is being provided off-site due to limited space within the site, this will include the provision of replacement individual trees of a similar or better value to those being removed on the site.

7.7 Flood Risk and Drainage

- 7.7.1 A Flood Risk and Drainage Strategy (Ref: CRM.3030.031.HY.R.001.A) has been submitted with this application which considers flood risk from all sources and includes a drainage strategy for the site.

Drainage

- 7.7.2 The site is part of an existing car park in the west (cable route) with the existing asphalt road connecting it to an area of hardstanding stone/gravel in the east where the EV charging bays and supporting infrastructure are proposed.
- 7.7.3 The surface water drainage strategy has been designed in accordance with the London Plan sustainable drainage hierarchy. SUDS such as rainwater as a resource, infiltration, attenuation within Green Infrastructure and discharge to a watercourse were not relevant or appropriate for this site. Therefore, the proposed drainage strategy will involve controlled discharge to the nearby surface water sewer. Surface water will be directed from the site via permeable paving that will collect in an inspection chamber with a 30mm orifice plate installed at the low point. The orifice plate will restrict flow to 1l/s and provide maintenance to 100mm diameter perforated pipes which will carry the water to the surface water sewer.
- 7.7.4 Overall, in accordance with the London Plan Policy SI13, the drainage hierarchy has been considered. SUDS will be used to control the surface water runoff from the proposed site.

Flood Risk

- 7.7.5 The Environment Agency online flood map shows the site is in Flood Zone 1, outside the 1 in 1000-year probability of fluvial (river) flooding (0.1% Annual Exceedance Probability [AEP]). Overall, it is considered that the probability and risk of flooding with the adoption of the surface water management strategy is negligible.

7.8 Noise

- 7.8.1 Due to the presence of sensitive noise receptors within the vicinity of the site at the Travelodge, a noise impact assessment (CRM.3030.031.NO.R.001) has been submitted with this application.
- 7.8.2 The BS4142 assessment shows that in a worst-case scenario, the predicted sound rating levels are below the measured background noise levels during both the day and overnight. This indicates that the sound would have a low impact and there would be no observed effect level at all nearby receptors.
- 7.8.3 Therefore, there will be no significant noise impacts on the nearby human receptors as a result of the proposed development. This demonstrates compliance with local plan policy DMT1.

7.9 Heritage

- 7.9.1 The site is located within the Stockley Park Grade II Registered Park and Garden. Stockley Park was first established in the mid-1980s, and was a pioneering design, and presented a skilled reuse of heavily contaminated land. In relation to design the Park and Garden was created by a collaboration between several prominent late 20th century designers, engineers and landscape architects. The carefully established design and consistent design parameter have made for a consistent landscape, and survival of the original masterplan and landscape framework despite the redevelopment of some buildings and modifications to their immediate landscape context.

- 7.9.2 The site is located in an area of hardstanding and is not within the Golf Course or designed gardens and public open spaces of the business park. Therefore, the existing site is considered to have a neutral contribution to its heritage value. There is limited intervisibility between the main areas of the registered park and garden, and where views do occur, these are filtered by existing built form and vegetation.
- 7.9.3 The proposed development would not result in any change to, or loss of any formally designed areas within the Registered Park and Garden. The change from the existing site would be negligible and proposals would not impact the heritage value of the park and garden. Therefore, the proposed development is fully compliant with Local Plan policy DMHB 8.
- 7.9.4 There are no archaeological assets within the proposed development site. Any archaeological potential is moderated by several phases of ground disturbance documented on and close to the site. Given the former uses of the site and surrounding area, the archaeological potential of the site is low for all periods. Minimal ground disturbance is proposed related to cabling, therefore a neutral effect is predicted, and no further mitigation is recommended.

7.10 Geo-environmental

- 7.10.1 The site comprises an open area of land surrounded by soft landscaping and mature trees. In accordance with Local Plan policy DME12, a ground contamination Preliminary Risk Assessment has been undertaken and submitted in support of this application [reference: CRM.3030.031.GE.R.001.C].
- 7.10.2 A site walkover survey was undertaken which observed a small quantity of recycled aggregate at the surface, and no visible evidence of contamination, such as clearly identifiable asbestos containing materials (ACM), stained or odorous materials were observed.
- 7.10.3 The site is in an area of historical landfill that extends off to the north beneath the Stockley Park Golf Course. The landfill dates from between 1950s to 1992 and permitted to receive inert, industrial, commercial, household and special waste. Infilled land (in the west of site) may also be associated with former brickworks (filled prior to 1970s). No evidence of 'waste' materials was noted at surface. It is likely that soils were placed above waste as part of restoration following completion of landfilling in 1992.
- 7.10.4 Considering the form of proposed development, the conceptual site model and preliminary risk assessment has identified that the risks from ground contamination are low, or low to moderate and no further intrusive ground investigations are required.

8 Conclusion

- 8.1.1 Enzygo have been instructed on behalf of our client, Tesla Motors Ltd, to submit a full planning application to the London Borough of Hillingdon in respect to Land at Stockley Park Golf Club, Hayes, Uxbridge, UB11 1AQ.
- 8.1.2 As outlined in section 6 of this report, the development is located within the 'Grey Belt' and given the minor scale of the development, does not impact upon the openness of the Green Belt in this location and is therefore fully compliant with the provisions of the NPPF, London Plan, and Local Development Plan.
- 8.1.3 Additionally, the principle of development is strongly supported by national and local policy objectives to deliver EV charging infrastructure as a core component of the decarbonisation of the transport sector. The site is strategically located as a destination-based charging hub serving visitors to the various amenities at Stockley Park Golf Club and Business Park, with convenient transport links to the A408 and M4 corridor within the London ULEZ boundary, where rapid and ultra-rapid public charging remains under-provided. The development therefore directly responds to identified need and accords with the London Plan, the NPPF, the UK EV Infrastructure Strategy and Croydon's Climate Emergency commitments.
- 8.1.4 All technical matters have been satisfactorily addressed. The proposal raises no unacceptable impacts in respect of ecology, heritage, flood risk, drainage, noise, air quality or safety.
- 8.1.5 Taken as a whole, the development constitutes a high-quality, low-impact and sustainable enhancement of an area Grey Belt, delivering clear environmental, functional and public benefits which outweigh any minor impacts of the proposed development. The proposal complies with the Development Plan when read as a whole, and there are no material considerations that indicate otherwise. Accordingly, planning permission should be granted without delay.



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