CARNEYSWEENEY

Date: 10th September 2024
Our Ref: CSC1159

Brunel House
2 Fitzalan Road
Cardiff
CF24 0EB

Redacted

Kirklees Metropolitan Council
Planning Services
Huddersfield
HD1 9EL

Planning Portal Reference: PP-13379720

Dear Sir/Madam,

APPLICATION ON BEHALF OF MOTOR FUEL GROUP
MORRISONS, 17 UNION STREET, HECKMONDWICKE, WF16 0HL

On behalf of our client, Motor Fuel Group (MFG), please find enclosed a planning application for the removal of existing jet wash and proposed extension to the existing petrol filling station's sales building, creation of an EV charging zone, substation enclosure, LV panel, meter cabinet and four jet wash bays, plant room, bin store and associated works at Morrisons, 17 Union Street, Heckmondwicke, WF16 0HL.

The schedule of areas (sqm) of the sales building are shown in the table below:

	Existing	Proposed Extension	Total
Gross External Area	32 sqm	65 sqm	97 sqm
Gross Internal Area	30 sqm	55 sqm	85 sqm

The following documents are submitted in support of this application:

- Completed Application Form
- Planning Supporting Letter (this document)
- Application drawings comprising:
  - 14314-2042-LP - Location Plan
  - 14314-2042-BP - Block Plan
  - 14314-2042-200 - Existing Site Layout
  - 14314-2042-201 - Proposed Site Layout
  - 14314-2042-202 - Existing Sales Building
  - 14314-2042-204 - Proposed Sales Building
  - 14314-2042-205 - Proposed Sales Building Elevations
  - 14314-2042-206 - EV Charger Details
  - 14314-2042-207 - Substation Details
  - 14314-2042-208 - LV Details
  - 14314-2042-209 - Meter Details
  - 14314-2042-210 - Jet Wash Elevations
  - 14314-2042-211 - AW Elevations
  - 14314-2042-212- Plant Room Elevations

Rational for the Proposal

The UK has committed to reducing greenhouse gas emissions by 28% by 2035 and moving to Net Zero by 2050. As part of the Net Zero strategy (October 2021), the UK Government have placed a new emphasis on

electric vehicle charging infrastructure in the UK. As part of this drive, it is essential that there is a comprehensive and competitive EV charging network in place.

The Department for Transport published 'Taking Charge: The electric vehicle infrastructure strategy'[1], which notes that the UK Government expects around 300,000 public chargers as a minimum by 2030 and their goal is to ensure these charge points are installed ahead of demand, inspiring confidence in drivers who have not yet made the switch.

The latest figures[2] (as at midnight 1 April 2024) shows that there were 59,670 public electric vehicle charging devices installed in the UK, an increase of just 5,993 in the last quarter. At the current pace, just 161,551 would be installed by 2030, with the target of 300,000 not being met until over 7.5 years later. To meet the target in time, 14,137 chargers would need to be installed each quarter between now and 2030 – a 236% increase over build rate. Rapid charging for longer journeys located in areas such as on motorways and in remote areas will be particularly important. At present, it is understood that the uneven spread of EV charging facilities significantly hinders the take-up of electric vehicles, due to potential servicing constraints. En-route charging for longer journeys is deemed crucial to support the switch to EV and reduce concerns about charge 'range anxiety'.

MFG is the UK's largest independent forecourt operator with over 900 sites offering a dual-fuel strategy, convenient retail and 'food to go'. For the abovementioned reasons, MFG are looking to roll-out an extensive supply of EV charging facilities at existing Morrisons sites across the UK to diversify their existing offer, with the aspiration to make it as easy to charge your vehicle as re-fuelling with petrol or diesel. The aspiration of MFG is to provide access to convenient and affordable charging, regardless of where the driver lives.

As part of MFG's proposals to upgrade facilities across their portfolio of Morrison petrol filling stations they are also taking the opportunity to extend the existing kiosk/shop, to provide an improved offer to visiting motorists.

Key Considerations

The National Planning Policy Framework (2023) indicates at Paragraph 116 (e) that new development should be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.

MFG's proposal to install new EV charging points at the Morrisons site should be considered positively in light of the national context and the demand for the necessary infrastructure to support electric vehicle use across the UK. The proposals would contribute positively to the existing EV charging network, to the benefit of those utilising the strategic highway network surrounding the application site. The proposals will enhance the existing offer at the site, without compromising the efficient operation of the facility.

The proposals do not raise any concerns regarding adverse impact on amenity / conflict in terms of surrounding land uses. The proposed area will be well-lit and does not raise any concerns from anti-social behaviour / natural surveillance perspective.

In terms of design, the proposed EV charging area has been carefully planned to positively integrate with the existing site operation. The charging facility offers a modern design approach, which is uncluttered and fit for purpose. The proposals will be Equalities Act compliant, offering dropped kerbs and other associated measures to ensure equal ease of access for all.

In terms of retail planning policies, the sequential and impact tests do not apply as the small kiosk offer is purely ancillary to the main use as a petrol filling station, which is not a 'main town centre use' (as defined in the National Planning Policy Framework) – petrol filling stations do not fall within the Class E(a) shop

[1] Taking charge: the electric vehicle infrastructure strategy (publishing.service.gov.uk)
[2] Electric vehicle public charging infrastructure statistics: April 2024 - GOV.UK (www.gov.uk)

use, being listed in the Use Classes Order 1987 (as amended) as a sui generis use. There should therefore be no mandatory requirement to assess the impact of the larger kiosk. In respect of the sequential test, again the land use is sui generis not a shop use, but in any event given any extension of the kiosk is intended to provide an improved offer to customers using the petrol filling station, it is site specific and clearly could not be located on a separate site.

Notwithstanding the above, if an impact assessment was required by policy, then the Government's Planning Practice Guidance (PPG) is clear that impacts should be assessed on a like for like basis in respect of the particular retail sector (PPG ref. 2b-015-20190722), which here would mean the impact of the larger forecourt kiosk on the turnover of other petrol filling stations. However, retail policies in both the National Planning Policy Framework and development plan are concerned with protecting the vitality and viability of defined town centres, so given the kiosk is purely ancillary to the petrol filling station use and caters to passing motorists and is not a retail destination in its own right, a retail impact assessment is clearly not warranted. The PPG also says that impact tests should be undertaken in a proportionate and locally appropriate way (PPG ref. 2b-017-20190722), so again, given the kiosk extension involves only a modest extension to a small retail offer intended to serve customers of the PFS, an impact assessment is not necessary. Any small uplift in turnover the extension will bring will not be spending that would otherwise be spent in the town centre.

We trust that the application is in order and that it can be processed accordingly. Should you have any queries or wish to discuss the above please don't hesitate to contact us.

Yours faithfully,

Redacted

Lucy Burton
Planner
CarneySweeney

Encl.