

Date: 13 January 2023
Our reference: CSC1038

Dear Sir/Madam,

**MOTOR FUEL GROUP
CLOCK TOWER SERVICE STATION, 133-139 MILTON ROAD, GRAVESEND, KENT, DA12 2RQ**

Introduction

We write on behalf of Motor Fuel Group with regard to the application for the removal of existing EV charging unit and the creation of an EV charging zone, sub-station enclosure and LV panel at Clock Tower Service Station.

Site Description

The application site is formed of an existing service station (*Sui Generis*) located at Milton Road, Gravesend. The service station is predominantly in a mixed commercial and residential area. The site is bounded by Milton Road to the north, Wellington Street to the east and Peacock Street to the west.

Background / 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. Although difficult to know precisely how much charging will be needed, forecasts suggest that at least 280 to 480,000 public charge points will be needed by 2030 – more than 10 times the current number (around 25,000)¹. 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'.

Motor Fuel Group 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, Motor Fuel Group are looking to roll-out an extensive supply of EV charging facilities at existing and new service stations 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 Motor Fuel Group is to provide access to convenient and affordable charging, regardless of where the driver lives.

The Clock Tower service Station proposals relate to the removal of existing EV charging unit and the provision of 4 no. electric vehicle charging points, substation enclosure, LV panel and associated forecourt works.

¹ Building a comprehensive and competitive electric vehicle charging sector that works for all drivers. Final Report. July 2021



The existing entrance from Wellington Street will be stopped up to allow for the proposed EV charging zone, however, the site access and egress from Milton Road (and the existing one-way flow through the site) will still be available.

Key Considerations

The National Planning Policy Framework (2021) indicates at Paragraph 112 that new development should e) be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.

Motor Fuel Group's proposal to install new EV charging points at Clock Tower Service Station 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 service station, 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 service station 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.

Submission

The application comprises the following information:

- CLOTOW-WPS-MFG-580-P-01 Block and Location Plans A3
- CLOTOW-WPS-MFG-580-P-02 Existing Site Plan A1
- CLOTOW-WPS-MFG-580-P-03-Existing Site Elevations A1
- CLOTOW-WPS-MFG-580-P-04 Proposed Site Plan A1
- CLOTOW-WPS-MFG-580-P-05-Proposed Site Elevations A1
- CLOTOW-WPS-MFG-580-P-06 Sub station and LV Panel Plan and Elevations A1
- WPS-MFG-STD-EV-01-4-1 EV Bays – Chamfered
- BS5837800847 (Arboricultural Impact Assessment)

Conclusions

The EV charging proposals are considered to positively respond to the local and national planning policy context and the wider UK aspiration to promptly improve the EV charging network. There are no physical environmental or designation constraints which would inhibit the occupation of the site for the proposed use.

Should you have any queries or wish to discuss please don't hesitate to contact us.

Yours faithfully,



Rahma Dwimunali
Assistant Planner
CarneySweeney

Encl.

