



**BNP PARIBAS
REAL ESTATE**

Planning Statement

Baldock EXTRA Services

Prepared on behalf of IONITY

September 2024

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Executive Summary

This application has been submitted to support the development of 18 new Electric Vehicle charging bays and associated infrastructure within the car park of the Baldock Extra Services located off the A1 Motorway Junction, which is located in the administrative boundary of North Hertfordshire Council.

The delivery of long-term, accessible, and sustainable means of transport is essential in supporting the Governments sustainability and zero carbon goals. This proposed development will help facilitate and provide much needed services to electric vehicle users. It has been well documented that there is a lack of public electric vehicle infrastructure in accessible locations, as highlighted in the statement below.

The development proposals will deliver a number of important benefits and help achieve the Governments zero carbon objectives. These benefits include:

- Supports the transition to highly sustainable modes of transport
- Supports the sustainability objectives of a local employer
- Is located on previously developed land
- Will not cause any adverse impacts on the transport network

1. Introduction

- 1.1. This application for full planning permission is made on behalf of our client, IONITY, in support of a planning application for the erection of an Electrical Vehicle (EV hereafter) charging hub at Baldock Extra Services, A1 Motorway, SG7 5TR.
- 1.2. IONITY is a joint venture of the car manufacturers BMW Group, Ford Motor Company, Hyundai Motor Group, Mercedes Benz AG and Volkswagen Group with Audi and Porsche, along with BlackRock's Global Renewable Power platform as financial investor. They are building, operating, and constantly growing their network of high-power charging stations along highways in 24 European countries. All charging stations are open to electric vehicles of any brand. With multiple charging points at each location. With ultra-fast charging stations that recharge a vehicle's batteries for the next stretch of the vehicle's journey in the shortest time possible. Importantly, IONITY provide 100% renewable energy everywhere in their network, delivering on ambitions for carbon-neutral driving.
- 1.3. IONITY are working with Extra Motorway Services Group in order to implement essential EV Charging infrastructure across Extra locations within the UK. Tom Dobson, CEO has stated *"The increase in IONITY charge points at Extra MSA Group's Motorway Service Areas will help meet the Government's UK Electric Vehicle Infrastructure Strategy. We are working closely with the Office for Zero Emission Vehicles and the Rapid Charging Fund to facilitate this vital expansion of charge points at our Motorway Service Areas"*.
- 1.4. The application seeks permission for the installation 18 EV charging bays, to form an 'Electric Hub', and the associated infrastructure necessary to support the development. This proposal will serve as an extension to the no.6 existing IONITY EV charging bays, that was approved under planning application ref: 20/00153/FP.
- 1.5. The development description for the purposes of this planning application is:

"The development of an Electric Vehicle charging hub with associated works and two substations"
- 1.6. This Statement should be read alongside the following:
 - Application form;
 - Location Plan;
 - Existing Site Plan;
 - Proposed Site Plan;
 - EV Bays and Equipment Area Plan;
 - Existing Elevations;
 - Proposed Elevations;

- Typical Planning Details;
- Product Data Sheet – HYC400
- LV Panel Foundation details
- Substation Plans
- Power Cabinet and Charger Manual
- Preliminary Ecological Appraisal
- Tree Survey
- Landscaping and Planting Plans

1.7. Our Statement is presented as follows:

- **Chapter 2** sets out the site context and planning history;
- **Chapter 3** considers the planning policy context;
- **Chapter 4** outlines the proposed development;
- **Chapter 5** sets out the case for planning permission; and
- **Chapter 6** provides the summary and conclusions.

2. Site Context and Planning History

- 2.1 This Section describes the Site and the surrounding area in terms of land use and key characteristics in order to set the planning context.

The Site and Surrounding Area

- 2.2 The site area for the proposed development extends to 0.234 acres and lies within the administrative boundary of North Hertfordshire Council. Please refer to the Red Line Site Boundary.
- 2.3 The site is serviced by strong existing transport infrastructure, with access off the A1 Motorway which serves as the main gateway towards London and provides access into Baldock and Letchworth Garden City, approximately 2 miles south.
- 2.4 The surrounding area outside of the Services, consists of greenfield land to the east, and the village of Radwell and Stotford lie on the western side of the A1 Motorway.

Planning History

- 2.5 The recent Planning History for the Baldock Extra Services is set out at Table 1.

Application Reference	Description of Development	Decision
20/00153/FP	Installation of six electric vehicle (EV) charging points and associated infrastructure.	Approved Subject to Conditions 2020.
17/02337/1	Increase parking provisions and alterations to existing parking layout.	Approved Subject to Conditions 2017
14/01762/1	The retention of 1 no. Electric Vehicle Quick Charging Point and the installation of 1 no. Electric Vehicle Quick Charging Point in main car park area.	Approved Subject to Conditions 2014.

Table 1: Planning History

- 2.6 The approved planning permission above (Ref: 20/00153/FP) relates to a previously granted decision for no. 6 IONITY Charging Bays. The current proposal of an additional no.18 chargers will be adding to this provision on site.

3. Planning Policy Context

- 3.1 Any proposal should be determined in accordance with national and local planning policies and guidance, as set out below.

National Planning Policy

- 3.2 The national policy context for the Site comprises two documents, the National Planning Policy Framework (December 2023), and the National Planning Practice Guidance (Live Document). Alongside these national planning policy documents, there is also the General Permitted Development Order 2015 (“GPDO”) which operates to deem the grant of planning permission for certain development without needing to apply for formal planning permission. Schedule 2 of the GPDO 2015 refers to this as “permitted development”.

National Planning Policy Framework (NPPF) (December 2023)

- 3.3 The NPPF sets out the Government’s planning policies for England and how these should be applied. It must be taken into account in preparing the development plan and is a material consideration in planning decisions. Planning policies and decisions must also reflect relevant international obligations and statutory requirements.
- 3.4 Paragraph 7 of the NPPF confirms that *“the purpose of the planning system is to contribute to the achievement of sustainable development including the provision of homes, commercial development, and supporting infrastructure in a sustainable manner. At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs”*
- 3.5 Paragraph 8 goes to outline that *“achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):*
- a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;*
 - b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being; and*
 - c) an environmental objective – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using*

natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.”

- 3.6 Paragraph 85 concerns building a strong, complete economy and states: *“Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future. This is particularly important where Britain can be a global leader in driving innovation, and in areas with high levels of productivity, which should be able to capitalise on their performance and potential.”*
- 3.7 Section 9 of the NPPF concerns promoting sustainable transport. Paragraph 114 confirms that *“in assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that: a) appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location.”*
- 3.8 Paragraph 116 states that *“applications for development should: (e) be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.”*
- 3.9 Section 14 of the NPPF considers the objective of meeting the challenge of climate change, flooding and coastal change. Paragraph 157 states that *“the planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.”* (emphasis added by author)

Permitted Development Rights

- 3.10 The Town and Country Planning (General Permitted development) (Amendment) (England) Order 2015 has introduced permitted development rights for electric vehicle charging points in off-street public and private car parking areas.
- 3.11 In the context of EV chargers, the GPDO 2015 deals with two different scenarios – (1) wall mounted outlets and (2) outlets on an upstand.
- 3.12 In relation to wall mounted EV charging outlets, the GPDO (Part 2, Class D) states:
- “D. The installation, alteration or replacement, within an area lawfully used for off-street parking, of an electrical outlet mounted on a wall for recharging electric vehicles.*

Development not permitted:

D.1 Development is not permitted by Class D if the outlet and its casing would—

- a) exceed 0.2 cubic metres;*
- b) face onto and be within 2 metres of a highway;*
- c) be within a site designated as a scheduled monument; or*
- d) be within the curtilage of a listed building.*

Conditions:

D.2 Development is permitted by Class D subject to the conditions that when no longer needed as a charging point for electric vehicles—

- a) the development is removed as soon as reasonably practicable; and*
- b) the wall on which the development was mounted or into which the development was set is, as soon as reasonably practicable, and so far as reasonably practicable, reinstated to its condition before that development was carried out.”*

3.13 In relation to outlets with an upstand, The GPDO (Part 2, Class E) states:

“E. The installation, alteration or replacement, within an area lawfully used for off-street parking, of an upstand with an electrical outlet mounted on it for recharging electric vehicles.

Development not permitted:

E.1 Development is not permitted by Class E if the upstand and the outlet would—

- a) exceed 1.6 metres in height from the level of the surface used for the parking of vehicles;*
- b) be within 2 metres of a highway;*
- c) be within a site designated as a scheduled monument;*
- d) be within the curtilage of a listed building; or*
- e) result in more than 1 upstand being provided for each parking space.*

Conditions:

E.2 Development is permitted by Class E subject to the conditions that when the development is no longer needed as a charging point for electric vehicles—

- a) the development is removed as soon as reasonably practicable; and*
- b) the land on which the development was mounted or into which the development was set is, as soon as reasonably practicable, and so far as reasonably practicable, reinstated to its condition before that development was carried out.”*

3.14 This application is not seeking to deliver the EV charging points through the Permitted development process. Notwithstanding, the proposed development is delivering EV charging units which are very similar to those allowed under PD rights. It is clear that there is a desire

from national government to facilitate the delivery of electric vehicle charging infrastructure and that the impact of this type of development is typically minimal in most places.

Local Planning Policy

3.15 Planning applications should be determined in accordance with s38(6) of the Planning & Compulsory Purchase Act 2004 unless material considerations indicate otherwise.

3.16 The development plan for the Site comprises:

- North Hertfordshire Local Plan (Adopted 2022). This document covers the policies and framework for future development within the district up to 2031.

3.17 The following Local Plan policies are relevant to the development proposals are:

- Policy SP5 – Countryside and Green Belt
- Policy CGB1 – Rural Areas Beyond the Green Belt
- Policy SP9 – Design and Sustainability
- Policy D1 – Sustainable Design
- Policy NE12 – Renewable and Low Carbon Energy Development
- Policy NE2 – Landscape
- Policy NE4 – Biodiversity and Geological Sites
- Policy NE8 – Reducing Flood Risk
- Policy SP6 – Sustainable Transport
- Policy T1 – Assessment of Transport Matters
- Policy T2 – Parking

Material Considerations

Taking charge: the electric vehicle infrastructure strategy

3.18 On 25th March 2022, the UK Government published 'Taking charge: the electric vehicle infrastructure strategy'.¹ This strategy sets out the government's vision and action plan for the rollout of electric vehicle charging infrastructure in the UK.

3.19 It sets out the vision for more publicly accessible EV charging chargepoints and confirms that these are needed for two main purposes: to enable long distance journeys, and to support those without off-street parking.

3.20 The Vision for 2030 set out in the Strategy states:

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https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1065576/taking-charge-the-electric-vehicle-infrastructure-strategy.pdf

“We 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. Specific predictions of the future mix and number of chargepoints are inherently uncertain in 2022 due to rapid developments in battery and charging technology, and because consumer preferences about where and when they would like to charge are still being revealed. The commercial landscape for charging infrastructure is also developing quickly but the balance between fewer, higher-powered chargers and more numerous, lower-powered ones is not yet clear. By 2030, we expect there to be around 300,000 public chargepoints as a minimum in the UK, but there could potentially be more than double that number.”

3.21 Finally, under ‘Annex 1. Roles and responsibilities’, the Strategy confirms that:

“Local government has a critical role in planning and delivering electric vehicle charging infrastructure.... Further, local authorities are able to bring wider considerations into the planning and delivery of on-street chargepoints, including granting permissions for the works to take place, approving on-street parking bays associated with chargepoints and balancing demands against other uses of the roads and pavements. This will be increasingly important as we transition to mass market adoption of EVs, and the number of drivers relying on public chargepoints increases.”

Climate Emergency

3.22 North Hertfordshire Council declared a climate emergency in May 2019. As a result of this, the Council aim to make their operations net zero by 2030, and for the wider North Hertfordshire to be net zero by 2040.

3.23 The implementation of proposals such as this, will assist the Council in achieving their sustainability and climate objectives.

4. Proposed Development

- 4.1 This section outlines the proposed development details. Please refer to the accompanying plans for information on structures and work proposed.
- 4.2 The proposed development plans include the following:
- 18 new EV charging parking bays (net increase of 24 chargers)
 - No. 2 of the EV bays will be for larger HGV/Lorry vehicles
 - Two Independent Distribution Network (IDNO) substations
 - Low Voltage (LV) panels
 - Power Cabinets
- 4.3 The provision of 18 new EV charging parking bays will result in the loss of 28 no. existing car parking bays (net loss 10 car parking spaces) and will provide a net increase of 24 EV Charging Bays, as the proposed development will serve as an extension to the previous permission granted in 2020 (Application Ref: 20/00153/FP) which relates to the installation of 6 EV Charging Bays.
- 4.4 The proposed development will not be replacing these bays but rather adding to them in order to increase the provision of EV Charging on site.
- 4.5 The car park currently has the capacity of 279 car parking/other vehicle parking bays. It is considered that this net loss of 10 parking spaces for EV charging is acceptable and will not have a detrimental effect on the parking capacity within the car park.
- 4.6 The development will involve the removal of an existing manhole, lighting pole and electrical earthing line. Please refer to the Existing Site Plan.
- 4.7 The development will also include no.2 large EV parking bays for larger vehicles. This is the only EV charging service available for these types of vehicles at the Extra Services station and must be delivered to begin the important decarbonisation process of large transporting vehicles.
- 4.8 There will be loss of a linear feature of mixed deciduous planting as a result of the development, however mitigation has been provided through replantation of additional native trees, scrubland, and grassland. Please refer to Section 5 for full details.
- 4.9 In addition, there will be no changes to the traffic routes and flow for vehicles in this park of the car park area. No material changes in total vehicle trips are expected.

5. The Case for Planning Permission

- 5.1 This section considers the key issues relating to the proposal in the context of relevant national, regional and local planning policy, as well as material considerations.

Principle of Development

- 5.2 The proposed EV charging infrastructure is to be located on an existing operational car park associated with the services. As such, the site should be considered previously developed.

Sustainable Development

- 5.3 As established in paragraph 14 of the NPPF, (Presumption in Favour of Sustainable Development) *“plans and decisions should apply a presumption in favour of sustainable development.”*
- 5.4 It is considered that as the proposals would deliver a low-carbon and highly sustainable form of development, and therefore it is not in conflict with the sustainable development guidance within the NPPF and should be supported by the Council.

Natural Environment

- 5.5 The land within the red line does not fall within the Green Belt, of which the boundary lies approximately 0.5 miles south, bordering Newnham Road.
- 5.6 As the proposed development does not lie within the Green Belt boundary, it is therefore not subject to the development criteria in accordance with the Green Belt Policy in the NPPF and Policy SP5: (Countryside and Green Belt), and therefore these policies are not applicable to the proposal.
- 5.7 It is however considered that the site is located within the countryside, and as such, Policy CGB1: (Rural Areas Beyond the Green Belt) is relevant to this application.
- 5.8 Policy CGB1 states that planning permission will be granted provided that the development:
- a) Is infilling development which does not extend the built core of a Category B village;*
 - b) Meets a proven local need for community facilities, services or affordable housing in an appropriate location;*
 - c) Is strictly necessary for the needs of agriculture or forestry;*
 - d) Relates to an existing rural building;*
 - e) Is a modest proposal for rural economic development or diversification; or*
 - f) Would provide land or facilities for outdoor sport, outdoor recreation and cemeteries that respect the generally open nature of the rural area.*

- 5.9 The development is not in conflict with Policies SP5 or CGB1, as the design and scale of the proposal mainly consists of implementing EV charging on existing hardstanding surface within the car park of the Extras Services station. It is therefore considered that the proposal will not have a material impact on the Greenbelt, nor will the design encroach on the landscape or openness of the Green Belt.
- 5.10 In addition, the proposal will not involve the irreversible loss, use, or harm of agricultural land.
- 5.11 The site in which the EV charging infrastructure will be contained (Extra Services), is an area that can be considered previously developed. Additionally, the proposal will not cause any noise, odour or light impact that would adversely affect the use and amenities of the wider rural area.
- 5.12 Policy D1: (Sustainable Design) states planning permission will be granted where development:
- a) Respond positively to the site's local context;*
 - b) Take all reasonable opportunities, consistent with the nature and scale of the scheme, to:*
 - i. create or enhance public realm;*
 - ii. optimise the potential of the site by incorporating Sustainable Drainage Systems (SuDS);*
 - iii. reduce energy consumption and waste;*
 - iv. retain existing vegetation and propose appropriate new planting;*
 - v. maximise accessibility, legibility and physical and social connectivity both internally and with neighbouring areas;*
 - vi. future proof for changes in technology and lifestyle;*
 - vii. design-out opportunities for crime and anti-social behaviour; and*
 - viii. minimise the visual impact of street furniture and parking provision;*
 - c) Have regard to the Design SPD, and any other relevant guidance;*
 - d) Within Letchworth Garden City have regard to the Letchworth Garden City Design Principles contained in Appendix 5; and*
 - e) For residential schemes, meet or exceed the nationally described space standards and optional water efficiency standards.*
- 5.13 Furthermore, Policy NE2: (Landscape) states that planning permission will be granted for proposals that:
- a) Respect the sensitivities of the relevant landscape character area and have regard to the guidelines identified for built development and landscape management;*

- b) Do not cause unacceptable harm to the character and appearance of the surrounding area or the landscape character area in which the site is located, taking account of any suitable mitigation measures necessary to achieve this;*
- c) Are designed and located to ensure the health and future retention of important landscape features; and*
- d) Have considered the long-term management and maintenance of any existing and proposed landscaping.*

- 5.14 The design of the proposal mainly consists of implementing EV charging on existing hardstanding surfaced area within the car park of the Extras Services station. It is therefore considered that the proposal will not have a harmful or unacceptable impact on the immediate context of the area.
- 5.15 The wider area consists of open countryside and agricultural land, however the proposed development will not have any impact on the open countryside, as the height and scale of the development will only be seen from within the context of the Services car park.
- 5.16 The proposal has been designed so that there will be minimal impact through its height, colours, and finishes. Please refer to the accompanying plans for more details.
- 5.17 Additionally, Policy SP9: (Design and Sustainability) states that the Council will “*support new development where it is well designed and located and responds positively to its local context*”.
- 5.18 The character of the immediate area can be described as previously developed brownfield land, whose main purpose is to providing stop-off facilities for vehicles travelling along the A1 Motorway. The context of this proposal, providing additional EV charging, does not clash with the wider rural character and will increase the EV Charging services that are needed at this facility.
- 5.19 The EV Charging Bays will be placed alongside the previously granted permission for 6 EV Bays (Ref: 20/00153/FP), and will be designed to the same height, colour and finishes of this development to ensure cohesiveness among the existing EV charging in place.
- 5.20 As such, it is considered that the proposed development is not in conflict with Policies CDG1, NE2 and SP9 of the Local Plan, and this development should be supported.
- 5.21 The proposal supports Policy NE12: (Renewable and Low Carbon Energy Development), as whilst proposed development does not include the production of renewable or low carbon

energy, it will use renewable electricity. Such proposals are essential for mitigation the impacts of climate change and encourage the modes of sustainable transport.

Flood and Drainage

5.22 The site is located on land classified as Flood Zone 1 (lowest possible risk of flooding). The site is also Low Risk of Surface Water or Groundwater flooding.

5.23 As such, it is considered that the proposed development is not in conflict with Policy NE8: (Reducing Flood Risk).

Transport

5.24 Policy SP6: (Sustainable Travel) states that the Council will promote the use of sustainable transport modes insofar as reasonable and practical. They will:

- a) Comply with the NHDC Transport Strategy and the provisions of the Local Transport Plan and other supporting documents as relevant;*
- b) Encourage development in locations which enable sustainable journeys to be made to key services and facilities;*
- c) Work with Hertfordshire County Council, neighbouring authorities, Highways England and service providers to ensure that a range of sustainable transport options are available to all potential occupants or users. This may involve new or improved pedestrian, cycle and passenger transport (including rail and/or bus) links and routes;*
- d) Seek the earliest reasonable opportunity to implement sustainable travel infrastructure on Strategic Housing Sites and other development sites in order to influence the behaviour of occupiers or users, along with supporting Travel Plans in order that sustainable travel patterns become embedded at an early stage;*
- e) Assess development proposals against the parking standards set out in this Plan and having regard to relevant supplementary advice;*
- f) Require applicants to provide assessments, plans and supporting documents to demonstrate the safety and sustainability of their proposals; and*
- g) Protect existing rights of way, cycling and equestrian routes and, should diversion be unavoidable, require replacement routes to the satisfaction of the Council.*

5.25 The proposed development does not adversely affect Policy SP6, as the proposal:

- Encourages and promotes the use of sustainable travel.
- It is considered that the proposal will have minimal impact on the transport network and is unlikely to cause congestion on the existing highways.
- There is strong existing transport and access infrastructure in place from the A1 Motorway, and the proposal will not harmfully impact this route. The proposal will not be introducing any additional access routes.
- There will be no impact to the strategic road network as a result of the development.

- There will also be no impact on residential properties or communities as a result of the development.
- 5.26 In addition, the proposed development is not in conflict with Policy T1: (Assessment of Transport Matters) as the development will not lead to unacceptable Highway safety or capacity issues. Due to the minimal impact the development will have on the Highways network, it is considered that a Transport Statement is not necessary to be undertaken as part of this proposal.
- 5.27 The proposed development is providing a sustainable travel choice in an area that is currently only serviceable by private cars, lorries and other transporting vehicles. The design and scale of the EV Charging Bays have been designed appropriately to deliver the essential requirement of recharging. The operation of the car park and the established routes for users will be maintained.
- 5.28 Policy T2: (Parking) states that permission will be granted where it is provided that:
- a) Parking for residential development is provided in accordance with the minimum standards set out in Appendix 4 of this Plan;*
 - b) Parking for non-residential development is provided having regard to the standards for non-residential development set out in the relevant Supplementary Planning Document;*
 - c) Proposals have regard to relevant Supplementary Planning Documents, strategies or advice and;*
 - d) Applicants clearly identify how they provide for all likely types of parking demand and demonstrate that parking will be safe and of a design and layout that will function satisfactorily.*
- 5.29 The car park currently has a capacity of 279 car and van vehicle bays, and the net loss of 10 parking spaces results in an overall 3.5% loss, which is considered acceptable. It is considered that the car park within the Extra Services has sufficient capacity to withstand this loss and the demand for additional EV charging for road users mitigates this.
- 5.30 The wider site contains disabled parking spaces provided on site, and the proposed development will not be replacing any of these disabled parking spaces.
- 5.31 The proposed development will be providing no.2 larger EV vehicle bays as the EXTRA Services does not currently have any EV facilities or infrastructure for larger vehicles.
- 5.32 Such EV infrastructure encourages the promotion and use of electric cars and ensures long distances can be travelled by having EV charging equipment located along busy routes that generate significant vehicle movement.

- 5.33 The implementation of the proposed development will result in the net loss of 22 car parking spaces, and a net increase of 18 EV charging spaces. Previous granted planning applications for EV charging infrastructure, for example Application Ref: 20/00153/FP, for 6 IONITY Charging Bays, demonstrates that there is a need for this type and scale of development.

Highway Safety and Capacity

- 5.34 The proposed development will be located on an area that already facilities an existing car park. The proposed development will not generate an increase in vehicular movements to the site beyond those that already exist, nor create any increase in air pollution due to the sustainable nature of the proposed method of transport.

Impact on Biodiversity

- 5.35 Policy NE4: (Biodiversity and Geological Sites) states that all *“Planning permission will only be granted for development proposals that appropriately protect, enhance and manage biodiversity in accordance with the hierarchy and status of designations and features listed in Policy SP12. All development should deliver measurable net gains for biodiversity and geodiversity, contribute to ecological networks and the water environment, and/or restore degraded or isolated habitats where possible.”*
- 5.36 The context of the immediate site area consists of brownfield land, with a large car park and Service station that contains an array of food and beverage facilities, and some hotel accommodation. As such, it is considered that the ecological value on the site is low.
- 5.37 In order to demonstrate the low impact on ecology as a result of the development, a Preliminary Ecological Appraisal (PEA) and an Arboriculture Survey has been undertaken.
- 5.38 The Tree Survey highlights that the development will result in the loss of a 20-metre linear section of mixed deciduous planting, likely lapsed hedgerows. Please refer to the Tree Protection Plan held within the Arboriculture Survey.
- 5.39 This section will be removed as shown on the Tree Protection Plan and the retained and protected with HERAS fencing.
- 5.40 The Applicant is committed to making sure any loss of trees or hedgerows is adequately mitigated and propose the additional planting of no. 6 new native trees, as well as mixed shrub planting and wildflower grassland. Please refer to the accompanying landscaping plans.
- 5.41 As part of the Preliminary Ecological Appraisal, a desktop study and site survey were undertaken to assess the likelihood and occurrence of protected species on site. It was found

that there was negligible potential for roosting bat species, due to there being no built structure capable of supporting them.

- 5.42 In addition, the survey shown that there was a negligible to low suitability or occurrence for protected sites, habitats, plant species, and amphibians (Great Crested Newts). There was moderate occurrence for birds and common and widespread mammals. Please refer to the PEA for further information.
- 5.43 A number of mitigation measures have been provided, which are summarised in Paragraphs 8.5 to 8.9 of the PEA. It is requested that any Conditions relating to these measures are discussed with the agent of the application in the first instance.
- 5.44 As such, we consider that the proposal has explored the potential adverse impacts on biodiversity and therefore, accords with Policy NE4 of the Local Plan.
- 5.45 Within the context of the proposed development, it is considered that full BNG assessment is neither reasonable nor feasible as part of this proposal, (as stated within the PEA), *“Applying a full biodiversity net gain assessment to these minor infrastructure modifications is not practical due to the limited scale of habitat alteration and the operational constraints of car park areas, such as access, safety requirements, and high light levels.* As such, the de minimis BNG exemption applies as outlined in the Planning Practice Guidance (004 Reference ID: 74-004-20240214).

Impact on Neighbour Amenity

- 5.46 The site is located off the A1 Motorway and is solely contained within the Extra Services site boundary.
- 5.47 There are no nearby properties in close proximity to the site, with the immediate area to the east consisting of greenspace and agricultural land. To the east, and additional parcels of greenfield land lies the town Stotfold.
- 5.48 It is considered that due to the separation distance and context of the surrounding area, the proposed development will not have a detrimental impact on residential properties when compared to the existing situation.

Anecdotal Evidence

- 5.49 It is clear that from a public perspective, there are not enough IONITY EV Charging Bays within the Baldock EXTRA Services car park for electric vehicle users. Many EV users have left online Google reviews, stating that they have had to wait to use the chargers, due to high demand and an insufficient number of EV chargers currently in place.

5.50 Below are some real reviews that can be found on Google, left by Ionity customers:

“Not enough places on a busy day”

“Love an ionity charge, fast and cheap with a Volvo, just wish there were more stations across the country as cheaper than charging at home.”

5.51 As evidenced from the above comments from IONITY customers, there is definite demand to increase the provision of EV charging within the car park. Additionally, it is imperative that this EV charging and its associated infrastructure is implemented, so that EV car users can enjoy a better service with less wait times.

6. Summary and Conclusions

- 6.1 Section 5 above demonstrates the scheme's adherence to the Local Plan. Paragraph 11 of the NPPF confirms that for planning applications, decision makers should approve *"development proposals that accord with an up-to-date development plan without delay."* As such, North Hertfordshire Council should approve the scheme outlined in this Planning Statement.
- 6.2 The development proposals will provide a raft of benefits, which include:
- It supports the transition to highly sustainable modes of transport
 - Supports the sustainability objectives of a local employer
 - Is located on previously developed land
 - Will not cause any adverse impacts on the transport network
- 6.3 The applicant looks forward to working with the local planning authority in helping deliver this positive development proposal as this development is proposing as a much-needed extension to the previously approved application for 6 EV Charging Bays.