



PLANNING STATEMENT

MER CHARGING UK LTD

INSTALLATION OF ELECTRIC VEHICLE CHARGING HUB AT ISLAND
GREEN RETAIL PARK, WREXHAM, LL13 7LW



PLANNING STATEMENT

On behalf of: MER Charging UK Ltd

**In respect of: INSTALLATION OF ELECTRIC VEHICLE CHARGING HUB
AT ISLAND GREEN RETAIL PARK, WREXHAM, LL13 7LW**

Date: February 2024

Reference: R001.P5772

Author: JM/TQ

**DPP Planning
DESG
11-13 Penhill Road
Cardiff
CF11 9PQ**

**Tel: 029 2280 4890
E-mail info@dppukltd.com**

www.dppukltd.com

Contents

1.0	INTRODUCTION	4
2.0	BACKGROUND SUPPORT.....	5
3.0	THE SITE	10
4.0	THE APPLICATION PROPOSAL.....	13
5.0	GENERAL NEED FOR CHARGING INFRASTRUCTURE.....	15
6.0	PLANNING POLICY CONTEXT	17
7.0	PLANNING CONSIDERATIONS.....	23
8.0	CONCLUSION	27

1.0 Introduction

- 1.1 This Planning Statement ('this Statement') has been prepared on behalf of MER Charging UK Ltd. ('the Applicants') to accompany an application to allow part of the existing car park at Island Green Retail Park, Wrexham, LL13 7LW, to be used as an ultra-rapid electrical vehicle charging hub with associated infrastructure ('the Proposed Development').
- 1.2 The Site is identified in red on the location plan accompanying this submission (drawing ref. E23-0155-P-009)
- 1.3 This Statement includes the following sections:
- Section 2: explains the background and wider policy support relating to the creation of additional charging infrastructure;
 - Section 3: describes the Site and planning history;
 - Section 4: describes the application proposal;
 - Section 5: is a summary of the general need for additional charging infrastructure;
 - Section 6: provides a planning policy summary;
 - Section 7: provides an assessment of the planning consideration; and
 - Section 8: summarises the proposals and concludes the planning balance.

2.0 Background Support

- 2.1 The following section sets out some general background and relevant policy relating to the need for the development of electrical charging sites, both nationally and within the surrounding area.

UK Government Policy

- 2.2 Over recent years the UK Government have set out a number of targets for the reduction of carbon emissions, a significant element of this relates to the emissions from petrol and diesel vehicles.
- 2.3 Originally, in 2015 the UK Government set a target to “ensure almost every car and van is a zero-emission vehicle by 2050”¹. In July 2017, the Government then made a further announcement that “it will end the sale of all new conventional petrol and diesel cars and vans by 2040.”²
- 2.4 To complement their strategy on emissions from vehicles, in November 2017, the UK Government set out its Industrial Strategy,³ designed to help build a productive, growing and green economy across the UK.
- 2.5 The UK Government also published the UK Plan for Tackling Roadside Nitrogen Dioxide Concentrations in July 2017⁴ and the Clean Growth Strategy in October 2017⁵, which sets out how the UK will cut exposure to air pollutants, reduce greenhouse gas emissions and improve our energy security.
- 2.6 The Road to Zero Strategy, published in July 2018⁶, built on these strategies, setting out new measures to clean up road transport and to put the UK at the forefront of the design and manufacturing of zero emission vehicles. The measures in the strategy are underpinned by nearly £1.5 billion of investment to support the transition to zero emission vehicles. In this strategy the Prime Minister reaffirmed that all new cars and vans should be “effectively zero emission” by 2040.
- 2.7 The Business, Energy and Industrial Strategy Committee’s report, *Electric Vehicles: Driving the Transition*, which was published in October 2018⁷ and endorsed by the Government, notes that the Government shares the Committee’s view that electric vehicles represent exciting

¹ GOV.UK, UK government pledges bold ambition for electric cars (3 December 2015)

² GOV.UK, Air quality plan for nitrogen dioxide No 2 in UK 2017 (26 July 2017)

³ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/664563/industrial-strategy-white-paper-web-ready-version.pdf

⁴ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/633270/air-quality-plan-detail.pdf

⁵ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/700496/clean-growth-strategy-correction-april-2018.pdf

⁶ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/739460/road-to-zero.pdf

⁷ <https://publications.parliament.uk/pa/cm201719/cmselect/cmbeis/383/383.pdf>

opportunities for the UK as a tool to address greenhouse gas emissions, reduce air pollution and as a new economic opportunity. The Government also agreed with the Committee that the transition to electric vehicles will need to be led by industry and consumers, and that a shift away from internal combustion engines to zero emission vehicles is essential if the Government is to achieve UK carbon targets at the least possible cost. In this document the Government reaffirmed its long-standing commitment for almost every car and van in the UK to be zero emission. To achieve this, the Government again confirmed that they will end the sale of new conventional petrol and diesel cars and vans by 2040 and part of the Government's 2040 mission is for all new cars and vans to be effectively zero emission by this date.

- 2.8 Additionally, this included the end of the sale of hybrids, and reflected the Interim Committee on Climate Change's advice on what is necessary for the UK to end its contribution to climate change by 2050.
- 2.9 Having undertaken this consultation, on the 18th November 2020 the UK Government released a 10-point plan for a Green Industrial Revolution⁸. The plans set out 10 main aims to eradicate the country's contribution to climate change by 2050. In terms of the production of electric vehicles, the Government confirmed that they are *"backing our world-leading car manufacturing bases including in the West Midlands, North East and North Wales to accelerate the transition to electric vehicles and transforming our national infrastructure to better support electric vehicles."* The headline commitment in this report was the announcement from Government that the UK would end the sale of new petrol and diesel cars and vans by 2030, ten years earlier than originally planned, with the sale of hybrid cars coming to an end in 2035 as long as they can drive a significant distance with no carbon coming out of the tailpipe.
- 2.10 The measures also included significant financial investment, including:
- £1.3 billion to accelerate the rollout of charge points for electric vehicles in homes, streets and on motorways across England, so people can more easily and conveniently charge their cars.
 - £582 million in grants for those buying zero or ultra-low emission vehicles to make them cheaper to buy and incentivise more people to make the transition.
 - Nearly £500 million to be spent in the next four years for the development and mass-scale production of electric vehicle batteries, as part of our commitment to provide up to £1 billion, boosting international investment into our strong manufacturing bases including in the Midlands and North East.
- 2.11 While the end to the sale of new petrol and diesel cars and vans has been revised to 2035, the UK Government has re-emphasised the commitment to decarbonise road transport in the future. In September 2023, the Prime Minister cited a lack of EV charging infrastructure as one of the key

⁸ <https://www.gov.uk/government/news/pm-outlines-his-ten-point-plan-for-a-green-industrial-revolution-for-250000-jobs>

reasons for delaying the ban, and therefore expanding the network of chargers is integral to meeting this revised target and reach the Government's wider net-zero goals.

The Law

The Environment (Wales) Act 2016

- 2.12 The Welsh Government is committed to introduce legislation to achieve a net zero 2050 target, in line with recommendations from the UK Climate Change Committee. The Environment (Wales) Act 2016 will support the rolling out of Welsh Government's climate change adaption plan. The legislation makes ambitious targets law for a whole-economy transition, to, ultimately, achieve *'at least 100% reduction ('net zero')'* by 2050. This legislation will become a focal point for all emerging strategies for the forthcoming 25 years.

Well-being of Future Generations (Wales) Act 2015

- 2.13 The Well-being of Future Generations (Wales) Act 2015 requires "public bodies to do things in pursuit of the economic, social, environmental and cultural well-being of Wales in a way that accords with the sustainable development principle". The Act sets out seven 'well-being' goals of which the following are relevant.
- A prosperous Wales: An innovative, productive and low carbon society which recognises the limits of the global environment and therefore uses resources efficiently and proportionately (including acting on climate change); and which develops a skilled and well-educated population in an economy which generates wealth and provides employment opportunities allowing people to take advantage of the wealth generated through securing decent work.
 - A resilient Wales: A nation which maintains and enhances a biodiverse natural environment with healthy functioning ecosystems that support social, economic and ecological resilience and the capacity to adapt to change (for examples, climate change).
 - A Wales of cohesive communities: Attractive, viable, safe and well-connected communities.
 - A globally responsive Wales: A nation which, when doing anything to improve the economic, social, environmental, and cultural well-being of Wales, takes account of whether doing such a thing may make a positive contribution to global well-being.

- 2.14 Within the Act, sustainable development is defined as follows: "the process of improving the economic, social, environmental and cultural well-being of Wales by taking action, in accordance with the sustainable development principle, aimed at achieving the well-being goals".

Transport (Wales) Act 2006

- 2.15 The Transport (Wales) Act 2006 places a duty on Welsh Ministers to prepare and publish a strategy setting out its policies and how they will be achieved. Covering all modes, it sets out strategic priorities and desired outcomes, providing a link to the wider priorities as well as plans at the local authority level.

- 2.16 The Act sets out that when making decisions, public bodies need to take into account the impact they could have on people living in Wales in the future and must apply the sustainable development principle in all planning decisions.

National Strategy and Policy

Welsh Government

- 2.17 In 2017, the Welsh Government set the ambition of achieving a carbon neutral public sector by 2030. In doing so, they recognised the public sector is uniquely placed to influence emissions far more widely than its own, relatively small direct emission in areas such as transport, energy and land use. As well as tackling the issues of air pollution, this approach can have a positive impact on the local economy by reducing energy costs and by creating investment opportunities for the low carbon economy.

Prosperity for All: A Low Carbon Wales

- 2.18 In March 2019, the Welsh Government published “Prosperity for All: A Low Carbon Wales”⁹ which sets out how Wales aims to meet its carbon targets. This includes support for proposals which will see the uptake of electric vehicles and the delivery of required charging infrastructure.

Llwybr Newydd: The Wales Transport Strategy 2021¹⁰

- 2.19 Although the main ambition of this strategy is to promote active travel (Walking and Cycling), the strategy does consider that dependency on cars is sometimes the only transport choice. In these circumstances, the document encourages the use of electric vehicles instead of the traditional petrol or diesel car.
- 2.20 This document goes on to recommend that further electric vehicle/bike charging facilities should become readily available through Wales to make a positive contribution towards well-being.

Electric Vehicle Charging Strategy for Wales

- 2.21 Underpinned by the Well-being of Future Generations (Wales) Act 2015, this document expands on the Llwybr Newydd strategy’s concept of recognising that electric vehicles’ play an important part in the future of transport.
- 2.22 This strategy establishes that by 2030, the number of fast chargers needed in the country is expected to increase from 30,000 to 55,000, with just 1% of this capacity currently operational. These figures include a predicted need for 4,000 rapid/ultra rapid chargers, of which 3% are

⁹ https://gov.wales/sites/default/files/publications/2019-06/low-carbon-delivery-plan_1.pdf

¹⁰ https://gov.wales/sites/default/files/publications/2021-03/llwybr-newydd-wales-transport-strategy-2021-full-strategy_0.pdf

currently installed. The strategy further states that successful action will rely on public and private sector collaboration.

Regional Strategy

North Wales Energy Strategy (Adopted October 2021)

- 2.23 The North Wales Energy Strategy was prepared by the Welsh Government Energy Service and sets out the goal of delivering maximum local economic, social, ecological and wellbeing benefits from transitioning to a net zero economy. The strategy sets out the Energy Vision up to 2035 and includes the predicted key growth areas in terms of energy usage within North Wales. One of the key priorities of the strategy is to support the rollout of EVs with appropriate supporting infrastructure, including future-proof charging points.
- 2.24 The strategy outlines that North Wales has so far seen a slow uptake of EVs, with just 0.1% of vehicles registered as pure electric, compared to 0.6% across the UK. The area has just 148 charging devices, including 14 rapid public chargers, therefore, increasing this is key to facilitating the transition to a net zero economy.
- 2.25 The Energy Vision scenario for 2035 sets out that by 2035, 55% of vehicles driven in North Wales will be electric, therefore the strategy sets out the goal of installing 2,000 public EV chargers across North Wales to facilitate this transition.

Local Strategy

Wrexham Decarbonisation Plan 2021-30 (Adopted May 2021)

- 2.26 The Wrexham Decarbonisation Plan 2021-30 was adopted in May 2021. This sets out measures the Council will take over the next decade with the aim of becoming carbon neutral as a body by 2030. This document highlights the need to increase EV charging provision in order to encourage more people to invest in EVs. The document outlines that Wrexham is one of the leading Welsh local authorities on EV charging, installing the first 100kW charger in north Wales, and sets out its goal to maintain this leading status on EV charging.

Summary

- 2.27 This review demonstrates regional and local level encouragement for electric vehicles that have the same values and direction as those of both the Welsh and UK government with an increasingly supportive policy and legislative framework emerging for this type of development proposal.

3.0 The Site

3.1 The below section describes the application site and outlines the planning history.

Site Context

- 3.2 The site forms part of a wider car park which is located within the Island Green Retail Park, Wrexham, LL13 7LW.
- 3.3 The site itself is located on the southern edge of the retail park, adjacent to the entrance off Watery Road. This retail park contains various commercial uses including a Primark, Poundland and a Domino's pizza. Wrexham Central train station is also located within the car park some 100m north of the site.
- 3.4 Further commercial uses are present to the north of the site within Wrexham city centre. Residential dwellings are found to the south and west of the site across Watery Road, which bounds the site to the south.
- 3.5 In terms of the site's wider context, it is situated within city centre and urban area of Wrexham. The site is approximately 20km south of Chester and 24km north of Oswestry.

Site Access

- 3.6 The site is accessed from the south via Watery Rd, which provides good connectivity to the city centre and further to the A541 and the A483. The A483 then connects the site to Chester around 20km north and Oswestry 24km to the south.

Technical Designations

- 3.7 The site is located wholly within Flood Zone C2 as shown on the development advice map below, meaning the site has a 0.1% to 1% (1 in 1000 to 1 in 100) chance of flooding from rivers in a given year, when taking into account the effects of climate change. This designation also means site does not benefit from significant flood defence infrastructure. This is a result of the site's location above the river Gwenfo which runs underneath the car park via a culvert between the railway line northwest of the site and St. Giles Way to the east.

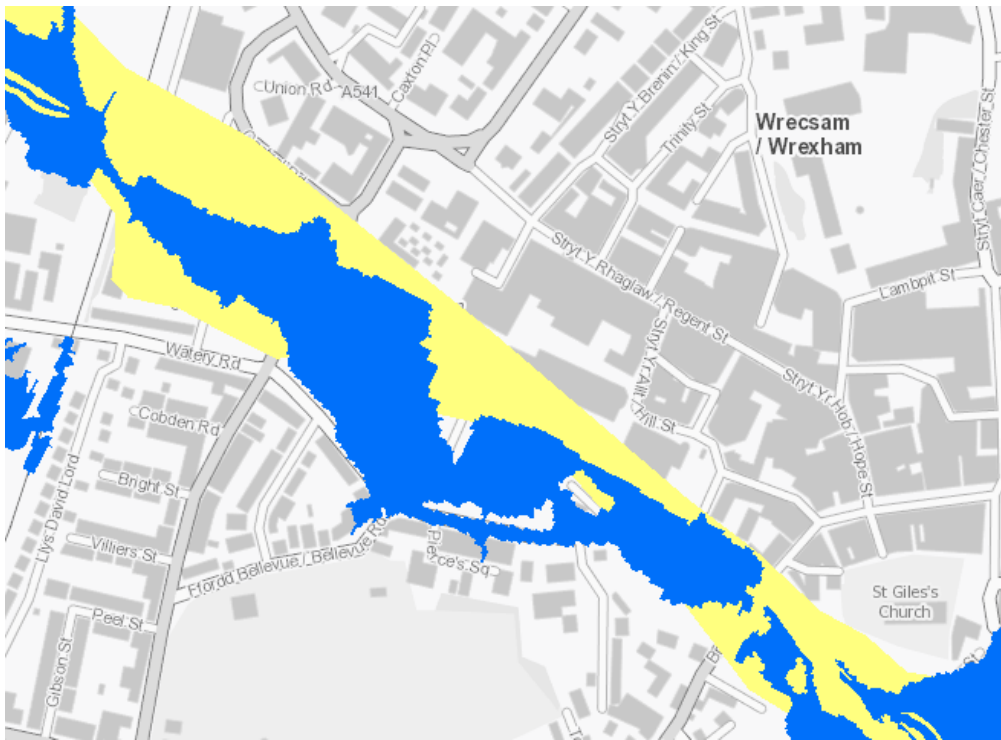


Figure 1: Extract from Natural Resources Wales Food Map

- 3.8 In terms of the historic environment, the Cadw historic assets map shows that there are two Listed Buildings near the Site. This includes the former Three Tuns Public House some 200m east, and one Listed Building within the retail park itself, namely the Grade II listed former Island Green Brewery. This building is set away from the wider retail park at a lower grade and bounded by a retaining wall along the western and northern boundary of the brewery.

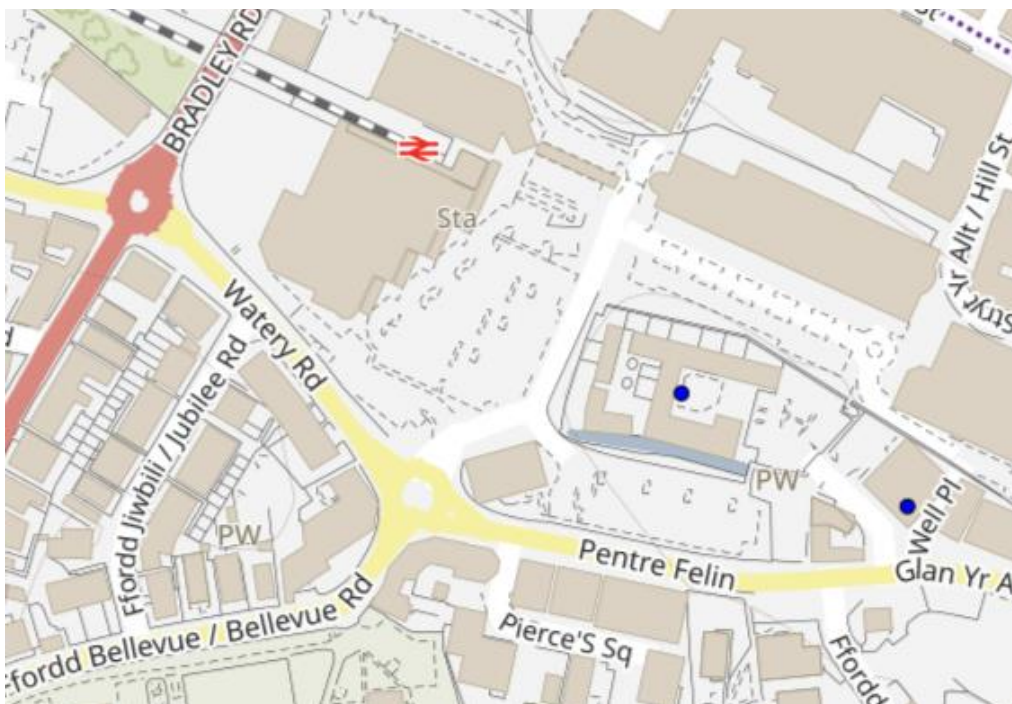


Figure 2: Extract from Cadw Historic Assets Map

Planning History

- 3.9 There have been a number of applications on the Island Green Retail Park site, primarily for the erection of advertisements, along with some minor alterations to the car park. There is no planning history on the site which relates to the delivery of electric vehicle charging infrastructure.

4.0 The Application Proposal

4.1 This Section sets out details of the Proposed Development.

MER Credentials

4.2 MER Charging UK Ltd. is a European EV charging company owned by Statkraft, Europe's largest renewable energy producer. MER Charging UK Ltd. is active in the UK, Norway, Germany, Austria and Sweden, and has over 25,000 EV charge points across Europe. In the UK, MER Charging UK Ltd. offers public EV charging infrastructure for commercial landowners and local authorities, along with workplace and fleet charging for businesses.

4.3 Backed with extensive experience within renewable energy and electric mobility, MER Charging UK Ltd. is developing a reliable, easy to use public EV charging network. Incorporated into Mer's strategy is sustainability and business ethos to provide 100% renewable energy solely from hydro, solar and wind.

4.4 Sustainable initiatives at Mer include calculating carbon footprint with the commitment of being a carbon-neutral company; promoting the circular economy through recyclable charge tags and planting a tree for every charger they install.

The Proposed Development

4.5 This application's proposal seeks planning permission for the following:

"Installation of ultra-rapid charging points and associated infrastructure at an existing car park"

4.6 This proposal will provide ultra-rapid EV charging facilities for both customers at Island Green Retail Park as well as to the general public, thereby improving the wider public's access to such a service.

4.7 The site area is 157sqm and will see the repositioning of 11 existing parking spaces to facilitate the delivery of the 6 dedicated EV charging spaces. These spaces will be served by 3 s-cc-5c-s Dual Charge points (1.5 meters in height). Each charger hub will be protected by two bollards located on each side of the charger, that measure 1m. These bollards will be illuminated to aid visibility and use of the charging points.

4.8 As the proposal is for ultra-rapid chargers, the application proposals also include ancillary infrastructure in the form of a 500kVA compact substation, KEM C400 unit with integrated harmonic unit and meter cabinet.

4.9 The substation will be located separately to the other ancillary infrastructure at the southeastern corner of the site. The proposed KEM C400 unit and schneider feeder pillar will be located adjacent to the substation at the south of the site on an existing patch of low-level landscaping. As such a limited area of landscaping between the car park site and Watery Road will be lost to facilitate the installation of this infrastructure.

- 4.10 The feeder pillar and KEM C400 unit will be housed within palisade fencing 2m in height with a single gate at the northeastern corner facing the parking area to enable maintenance to be carried out.
- 4.11 The access to the site will remain as existing via Watery Road.

5.0 General Need for Charging Infrastructure

- 5.1 As outlined in Section 2.0 of this Statement, the UK has committed to an ambitious journey to clean transportation. The market has started to provide a range of electric passenger cars and some black cab taxis and to a lesser extent commercial vans and buses. However, a widely recognised hurdle for fleet operators to move to 100% electric vehicles is the fact that there is an insufficient fast and rapid charging infrastructure network available.
- 5.2 There is wide consensus amongst vehicle fleet operators that large-scale transition to electric vehicles requires a network of electric vehicle charging facilities that can simultaneously charge multiple vehicles through high-powered ultra-rapid chargers.
- 5.3 However, ultra-rapid chargers require significant investment, including power grid upgrades and rely on operating models with high utilisation. Ultra-rapid electric vehicle chargers can cost between £50-100k per charging unit, depending on model and manufacturer. For a medium-sized electric vehicle hub this runs quickly in to the several hundred thousand pounds. Further, there is a need for power equipment, civil works and auxiliary equipment and often the need to upgrade the wider power network. Hence, allowing businesses to provide such infrastructure should be a welcomed prospect for any local authority.
- 5.4 Furthermore, there is a shortage of ultra-rapid charging facilities and these are not always located where they are needed.
- 5.5 All Plug-in Vehicles (PIVs) require some form of Electric Vehicle Supply Equipment (EVSE) to recharge their batteries, situated at suitable locations, over a suitable duration and at appropriate times of day or night to meet users' requirements. In a departure from the driver's expectation, built up from years of filling with diesel/petrol, the vehicle dictates how power is drawn from the grid and therefore controls the speed of recharge, not the EVSE equipment.
- 5.6 Consumer preferences and habits also have a role to play in recharging behaviour, and many consumers still consider current recharging durations as a limitation of PIV. However, different recharging equipment types are now available to suit different use cases. Consumer preferences have not yet been fully established, which is a challenge when planning a service such as a charging network.
- 5.7 A study prepared by the Energy Saving Trust, Mapping Rapid Charge Point Locations for Private Hire Vehicles in London (January 2017)¹¹ confirmed that drivers' working patterns, hours worked, and locations covered vary significantly across the operators. Although, we acknowledge that London's current EV position may be considerably advanced from the rest of the country, it could be an invaluable insight into patterns of development in years to come.

¹¹ <http://content.tfl.gov.uk/chargepoint-infrastructure-for-the-london-private-hire-industry-draft.pdf>

- 5.8 Nationwide the total number of locations which have a public charging point installed is 11,915 and the number of devices at those locations is 20,336. The total number of connectors within these devices is 33,281. However, the vast majority of these are fast chargers.
- 5.9 A slow charger is 3-5kW, a fast charger 7-22kW, a rapid charger 25-99kW and an ultra-rapid charger is 100kW+. For example, to charge a Tesla Model S on a slow charger would take 21 hours; between 5 and 11 hours on a fast charger; less than 2 hours on a rapid charger; and less than an hour on an ultra-rapid charger. It is ultra-rapid charging facilities that are needed to make PIVs a more accessible mode of transport.
- 5.10 According to ZAP MAP¹² of the 55,301 connections, only 4,061 are ultra-rapid charging.

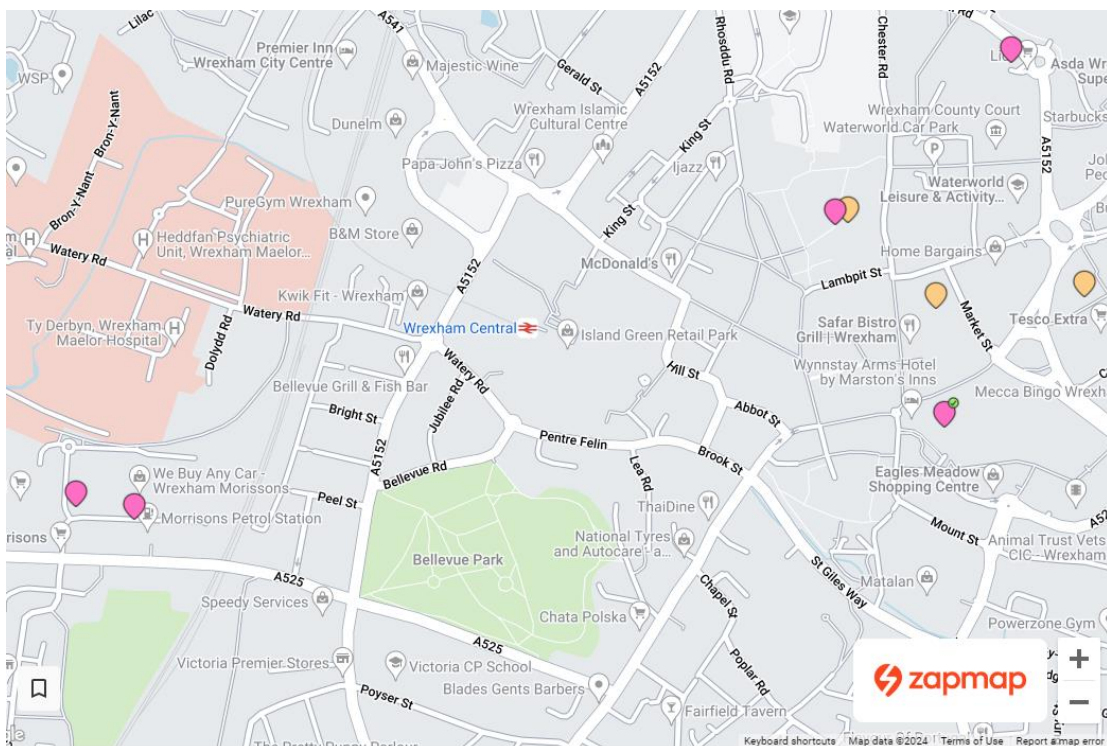


Figure 3: ZAP Map Extract

- 5.11 The above map shows a notable lack of charging infrastructure within the surrounding area. The pink icons indicate 50kW rapid chargers, while the yellow icons indicate 7kW fast chargers. As such, figure 3 above demonstrates that there are no ultra rapid charging facilities within the immediate or wider area surrounding the site. As such, installing EV charging infrastructure at this site would contribute towards the provision of much needed EV infrastructure within this area.

¹² <https://www.zap-map.com/statistics/>

6.0 Planning Policy Context

- 6.1 National and local planning policy has been reviewed in the preparation of this application. This planning statement emphasises specifically on the main planning policies considered appropriate to the issues raised by the Proposed Development.

National Planning Policy

Planning Policy Wales (PPW) Edition 12 (February 2024)

- 6.2 PPW is the Welsh Government's principal planning policy document, with the primary objective of ensuring that the planning system contributes towards the delivery of sustainable development and improves the social, economic, environmental, and cultural well-being of Wales, as required by the Planning (Wales) Act 2015, the Well-being of Future Generations (Wales) Act 2015 and other key legislation. Relevant paragraphs from PPW are as follows:
- 6.3 **Paragraph 2.3** dictates that the planning system should create sustainable places which are attractive, sociable, accessible, active, secure, welcoming, healthy and friendly. Development proposals should create the conditions to bring people together, making them want to live, work and play in areas with a sense of place and well-being, creating prosperity for all.
- 6.4 **Paragraph 2.13** outlines the Key Principles represent a guiding vision for all development plans, including Future Wales. These principles support the culture change needed to embrace placemaking and ensure that planning facilitates the right development in the right place. The relevant principles include:
- Making best use of resources
 - Facilitating accessible and healthy environments
 - Maximising environmental protection and limiting environmental impact.
- 6.5 **Paragraph 3.7** recognises that good design promotes environmental sustainability and contributes to the achievement of the well-being goals. Developments should seek to maximise energy efficiency and the efficient use of other resources (including land), maximise sustainable movement, minimise the use of non-renewable resources, encourage decarbonisation and prevent the generation of waste and pollution.
- 6.6 **Paragraph 3.30** conveys that in 2019 the Welsh Government declared a climate emergency. The transition to a low carbon economy not only brings opportunities for clean growth and quality jobs, but also has wider benefits of enhanced places to live and work, with clean air and water and improved health outcomes.
- 6.7 **Paragraph 4.1.6** Planning authorities should support the uptake of Ultra Low Emission Vehicles and facilitate the provision of transport infrastructure and necessary sustainable transport improvements and development.

- 6.8 **Paragraph 4.1.40** The Electric Vehicle Charging Strategy and action plan sets out the Welsh government's approach to delivering the EV charging infrastructure needed by 2050.
- 6.9 **Paragraph 4.1.41** To encourage the use of Ultra Low Emission Vehicles (ULEVs), the planning system should encourage and support the provision of ULEV charging points as part of new development. Future Wales sets out the Welsh Government's requirements for the provision of electric vehicle charging points for non-residential development.
- 6.10 **Paragraph 4.1.42** The provision of electric vehicle charging points should be planned as part of the overall design of a development. Charging points must not cause an obstruction to walking or cycling, should be resistant to vandalism, and located where there is good lighting and natural surveillance.
- 6.11 **Paragraph 6.6.22** States that planning authorities should adopt a precautionary approach of positive avoidance of development in areas of flooding from the sea or from rivers, while surface water flooding will affect the choice of location and the layout and design of schemes.
- 6.12 **Paragraph 6.6.25** outlines that development should reduce, and must not increase, flood risk arising from river and/or coastal flooding on and off the development site itself.

Future Wales: The National Plan 2040

- 6.13 Future Wales - The National Plan 2040 (2020) is the national development framework, setting the direction for development in Wales to 2040. It is a development plan with a strategy for addressing key national priorities through the planning system including sustaining and developing a vibrant economy, achieving decarbonisation and climate resilience, development strong ecosystems and improving the health and well-being of our communities.
- 6.14 Relevant policies from Future Wales are as follows:
- 6.15 **Policy 11 – National Connectivity** – Aims to create a network of rapid-charging points to enable longer distance travel by electric vehicles throughout Wales.
- 6.16 **Policy 12 – Regional connectivity** – Sets out that where car parking is provided for new non-residential development, planning authorities should seek a minimum of 10% of car parking spaces to have electric vehicle charging points.

Permitted Development Rights

- 6.17 Permitted development rights exist for the installation of electric vehicle charging points under Schedule 2, Part 2, Class E of The Town and Country Planning (General Permitted Development) (Amendment) (Wales) Order 2019. This application is submitted as the additional infrastructure required to serve the high-speed charging is, we believe, beyond the scope of what is covered by permitted development. However, it is clear that the installation of the charging units themselves

could utilise permitted development powers. As such, the principle of acceptability of the proposals is limited to those elements which are not covered by permitted development.

Local Planning Policy

6.18 The development plan for Wrexham Council comprises the following document:

- Wrexham Local Development Plan 2 2013-2028 (“LDP”) (Adopted December 2023)

Policies Map

6.19 The site is designated as being within the City Centre and the City Centre Masterplan Area, as shown by the blue line. The site is subject to no other policy designations.

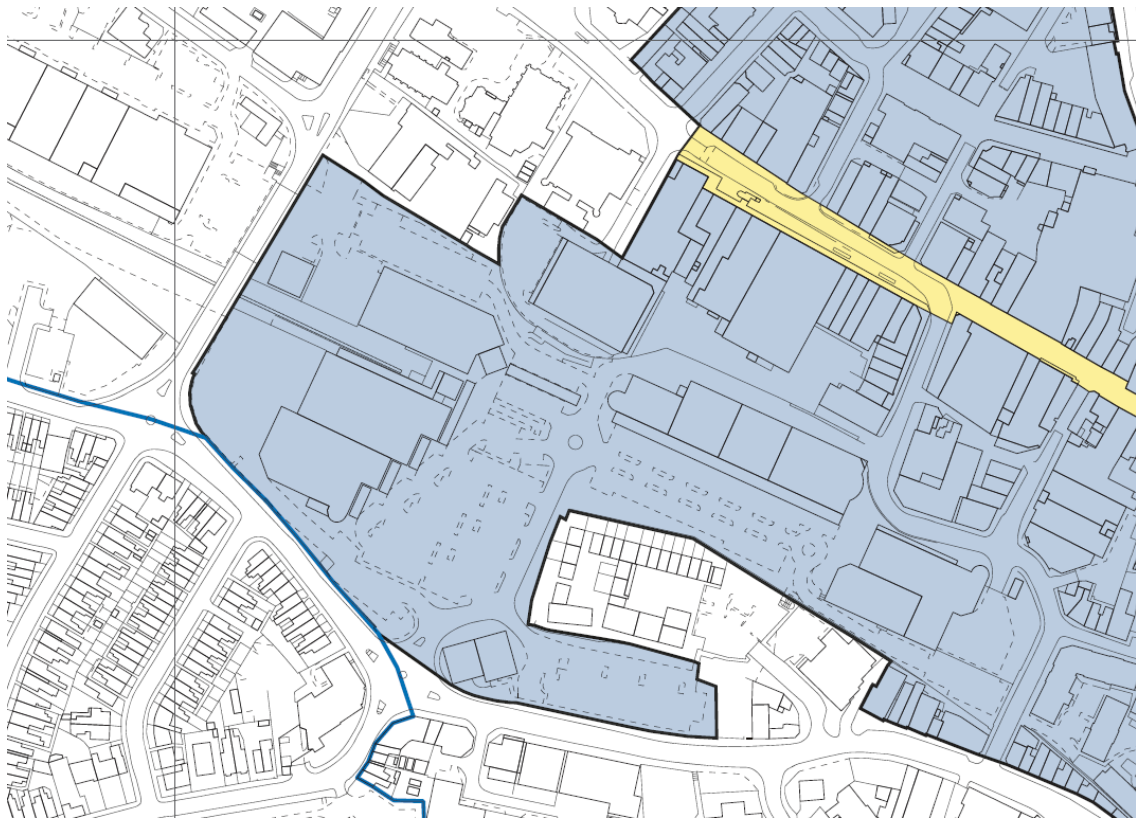


Figure 4: Policies Map – Wrexham City Centre Insert Extract

Constraints Map

6.20 As alluded to previously, the Constraints Map re-confirms that the site lies within Flood Zone C2 as shown by the blue dashed lines.

6.21 The site is also situated approximately 200m south of a Conservation Area as indicated by the orange line as set out in Figure 5 over the page.

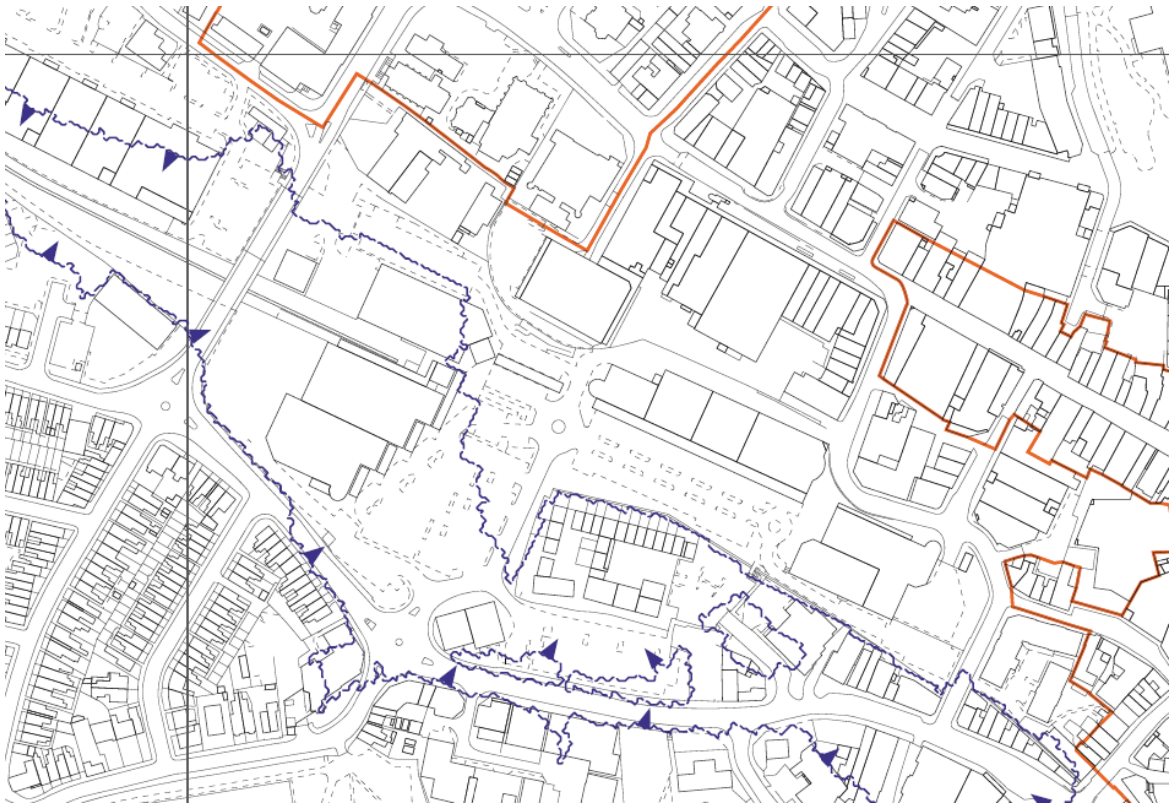


Figure 5: Constrains Map – Wrexham City Centre Insert Extract

6.22 Based on the above policy designations, constraints and consideration of the Proposed Development, the relevant policies contained within Cardiff's Local Development Plan are as follows:

- Policy SP2: Location of Development
- Policy SP7: Wrexham City
- Policy SP11: Transport and Accessibility
- Policy SP12: Design Principles & Master planning Framework
- Policy SP15: Historic and Cultural Environment
- Policy SP18: Climate Change
- Policy SP19: Green Infrastructure
- Policy DM1: Development Management Considerations
- Policy NE3: Trees, Woodlands and Hedgerows
- Policy T1: Managing Transport Impacts

6.23 **Policy SP2: Location of Development** States that new development should be directed to the defined settlement limits identified by the Proposals Map.

6.24 **Policy SP7: Wrexham City** Further states that Wrexham City, as defined by the Proposals Map, will be the focus of new development, including transport infrastructure and other services.

- 6.25 Policy SP11: Transport and Accessibility** Establishes that Wrexham's transport network will be developed in a safe, efficient and sustainable manner, by restricting development that would have an unacceptable impact on the safe and efficient operation of the highway network, and through the enhancement of the network to respond to the effects of climate change.
- 6.26 Policy SP12: Design Principles & Master planning Framework** Outlines that all development will be required to comply with the master planning framework SPG and be of high-quality, sustainable design which makes a positive contribution to the creation of locally distinctive places.
- 6.27 Policy SP15: Historic and Cultural Environment** Stipulates that development will only be supported where it conserves, protects, preserves or enhances historical assets including Listed Buildings and Conservation Areas.
- 6.28 Policy SP18: Climate Change** Concerns climate change and highlights that development proposals must mitigate and adapt to the effects of climate change by reducing CO2 emissions, promoting energy efficiency, locating highly vulnerable development away from Flood Zone C2, and preventing development that increases flood risk, among other measures.
- 6.29 Policy SP19: Green Infrastructure** States that protection, conservation and enhancement of natural heritage networks needs to be reconciled with the benefits of development. Development will therefore be required to maintain the extent and quality of green infrastructure on or near a site.
- 6.30 Policy DM1: Development Management Considerations** Lists several requirements for development proposals, including to:
- Accord with or enhance the character, local distinctiveness and appearance of the site.
 - Not have an unacceptable effect on the amenity of the occupiers of nearby properties.
 - Safeguard the environment from the adverse effects of pollution.
 - Prioritise active travel and public transport ahead of travel by car.
 - Not give rise to highway safety, pedestrian safety or parking problems on site.
 - Be designed to minimise the use of non-renewable energy.
 - Not increase the risk of flooding but make adequate provision for sustainably dealing with surface water drainage.
- 6.31 Policy NE3: Trees, Woodlands and Hedgerows** Sets out that development will only be permitted where it does not cause unacceptable harm to trees, woodlands and hedgerows of significant public amenity, natural or cultural heritage value. Where this is not possible, adequate mitigation will be required.
- 6.32 Policy T1: Managing Transport Impacts** Outlines that proposals should be supported where they:
- Facilitate increased journeys by sustainable modes of travel;

- Do not compromise the safe effective and efficient use of the highway network and do not have an adverse impact on highway safety;
- Provide appropriate levels of parking and ensure access arrangements for the site allow for safe manoeuvring ; and
- Make provision for people with restricted mobility including those with characteristics as defined by the Equality Act 2010.

Supplementary Planning Guidance

TAN 15: Development, Flooding and Coastal Erosion (December 2021)

- 6.33 TAN 15 provides technical guidance which supplements the policies set out in PPW in relation to flooding and coastal erosion. It provides a framework within which the flood risks arising from rivers, the sea and surface water, and the risk of coastal erosion can be assessed.
- 6.34 Within TAN 15 it is noted that transport infrastructure is recognised as ‘less vulnerable development’ in relation to flooding.
- 6.35 It should also be noted that, although not yet adopted, the latest draft Edition of TAN 15 through paragraph 7.12 outlines that development proposals for transport infrastructure which can help to mitigate the impacts of climate change should be supported in flood zones which are of high risk to flooding.

7.0 Planning Considerations

- 7.1 Section 2 of this Statement sets out the supporting background for the Proposed Development in terms of Government and Ministerial Statements on the climate change agenda both nationally and locally and, in particular, the targets for the reduction of carbon emissions through the transition from petrol and diesel modes of transport to electric vehicles. Government and Ministerial Statements and local policy initiatives are material considerations relevant to determination of the Proposed Development, particular as most of these statements post-date the development plan.
- 7.2 Section 38(6) of the Planning and Compulsory Purchase Act 2004, Section 70(2) of the Town and Country Planning Act 1990 stipulates that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise.
- 7.3 Section 6 of this Statement has established the national and local planning policies which are relevant to the consideration of the Proposed Development.
- 7.4 This Section will now consider the Proposed Development in the context of the above and against the following matters:
- The principle of development
 - Other material considerations:
 - Flooding
 - Climate Change
 - Heritage
 - Highways and Transport Infrastructure
 - Landscaping
 - Lighting

Principle of Development

- 7.5 The principle of delivering EV charging infrastructure is firmly established at all levels of planning policy in Wales. Nationally, Policy 11 of the Future Plan conveys how a network of rapid-charging points are required to enable longer distance travel by electric vehicles, whilst the PPW through paragraph 4.1.41 supports the provision of ULEV charging points to encourage the use of Ultra Low Emission Vehicles.
- 7.6 Locally, Wrexham County Borough Council also support the delivery of EV charging infrastructure through both Policy SP11 and SP18. These policies promote the use of sustainable transport modes and the reduction of CO2 emissions respectively, thus establishing that the principle of this proposal is acceptable. This is further supported by the aims of North Wales Energy Strategy which outlines that 2,000 'future proof' charging points need to be installed across North Wales to meet future demand.

- 7.7 In terms of the site itself, this development proposal presents no material different use on the site which is already a car park serving the existing retail park. The application proposal simply proposes to install infrastructure to enable a number of parking spaces to provide ultra-rapid charging. On this basis, the principle of the proposal within this location should be deemed as acceptable.

Other material considerations

Flooding

- 7.8 Notwithstanding the site being designated within Flood Zone C2, EV charging is considered as a low vulnerability use to flooding within TAN 15. Further to this, and as alluded to above, the proposal presents no material change in use to the site, therefore it is considered the proposal will not increase flood risk elsewhere.
- 7.9 Furthermore, several in built safety features are incorporated into the equipment in the event of a flood risk event. For example, if either the chargers, substation or other ancillary equipment suffers water damage, they all will trip. This will alleviate electrical related health and safety risks associated with the proposal.
- 7.10 Further to the above, all equipment installation is compliant with British Standard BS 7671 which is the national standard used for electrical installation and wiring safety across domestic, commercial, and industrial properties. An electrical installation certificate will also be obtained prior to operation which will confirm that the work carried out meets these safety standards.
- 7.11 Overall, these mitigation strategies and safety measures will ensure that there is no risk to public safety presented by this development proposal.
- 7.12 Taking this into consideration, the proposal should be viewed as acceptable from a flood risk perspective and compliant with the ambitions of Policy SP18 within the Wrexham LDP.

Climate Change

- 7.13 As already noted, Wrexham County Borough Council are advanced in their development and consideration of climate change. This is illustrated by the council declaring a climate emergency over four years ago, and subsequently producing ambitious targets to achieve carbon neutrality which exceed national government targets.
- 7.14 The Council are also aware of the significant contribution electric vehicle charging infrastructure can make in delivering on these ambitions. As the Decarbonisation Plan outlines, the Council recognises the need to increase EV charging provision in order to encourage more people to invest in EVs. Both the EV Charging Strategy for Wales and the North Wales Energy Strategy outline the predicted increases in EV charging provision needed to meet climate targets, with 97% of the necessary 4,000 rapid charging points still to be installed across Wales.

- 7.15 Similar ambitions are also reflected in the Council's climate strategy as outlined in the Wrexham Decarbonisation Plan. This highlights the desire to accelerate the uptake of cleaner vehicles and technologies that are capable of improving air quality as well as health outcomes, which also contribute to sustainable growth as part of the transition to a low emission economy.
- 7.16 Accordingly, it is considered that the Proposed Development is entirely consistent with Wrexham's climate change objectives.

Heritage

- 7.17 The site is situated near the Grade II listed former Island Green Brewery. Notwithstanding this, the proposal will have very limited impact on its setting given that visibility of the site from the former brewery is limited due to a substantial level change, along with a retaining wall and vegetation surrounding the Listed Building.
- 7.18 Furthermore, the existing setting of the heritage asset comprises typical retail park development. Given that this proposal constitutes a small scale, minimalist development, it will have very limited impact on the setting of the brewery. Therefore, the Proposed Development will not have any adverse impact on the setting of the nearby heritage assets in line with Policy SP15.

Transport Infrastructure and Highways

- 7.19 To accommodate the slightly wider than standard parking bays the proposal will see the repurposing of some existing car parking spaces. Notwithstanding this, the proposal will not lead to an increase of on-street parking, nor impact on the character of the area and, therefore, should not be viewed as contrary to Policy SP11 as there is ample parking associated with the retail park.
- 7.20 Furthermore, the site is in a highly accessible location for EV charging facilities. The site located adjacent to Watery Road, situated within the City Centre of Wrexham, which has strong links out of the city via the A541. This highway provides onward connection to the A483 and other major settlements such as Oswestry and Chester. As such, the site is well related to existing highways infrastructure and is easily accessible for EV users.
- 7.21 The addition of these electric vehicle hubs will also act to reduce the need for drivers to travel significant distances to find ultra-rapid charging facilities.
- 7.22 Accordingly, it is considered that the proposal is entirely in line with local policies in respect of highway safety, namely Policy SP11.

Landscaping

- 7.23 It is noted that to facilitate the Proposed Development, a small area of existing vegetation located between the site and Watery Road will be lost. Notwithstanding this, the landscaping located within this area is of limited visual quality and provides minimal ecological contributions.

Given this limited value, this should not constrain the development potential of the site or impede the granting of consent of this proposal.

Lighting

- 7.24 There are already lighting columns present within the site which is also located within the urban centre of Wrexham. Taking this into consideration, the introduction of low-level lighting bollards should not be viewed as creating an adverse impact or constrain the development potential of the site. Therefore, the additional lighting proposed should be accepted in principle.

8.0 Conclusion

- 8.1 This Planning Statement is submitted in support of a planning application for installation of ultra-rapid charging points and associated infrastructure within Island Green Retail Park.
- 8.2 With almost a third of greenhouse gasses in the UK resulting from transportation, the Government recognises that there is a need to transition from fossil fuel modes of transport to clean modes, primarily electric vehicles. The UK Government has subsequently set out its plans to cease the sale of petrol and diesel cars in the UK by 2035.
- 8.3 This is further supported by the Welsh governments strategies and legislation which wholly strengthen the contention for wider provision of EV charging infrastructure.
- 8.4 While Wrexham County Borough Council do not have a specific EV charging strategy, they recognise the need to increase EV charging provision to encourage the uptake of EVs within their Decarbonisation Plan. Furthermore, Local Plan Policies SP18 and SP12 support the reduction of CO2 emissions, the promotion of sustainable travel choices and delivery of a transport network that can adapt to the effects of climate change.
- 8.5 Taking the above into consideration, there is a clear local and national ambition of tackling climate change, encouraging sustainable travel modes and assisting in achieve net carbon zero targets.
- 8.6 It is widely recognised that the lack of charging infrastructure, particularly ultra-rapid charging stations, is a major barrier to the take up of electric vehicles. Ultra-rapid charging facilities are, therefore, essential for the transition in environmentally sustainable behaviour to meet the net carbon zero targets.
- 8.7 We have outlined that the site is an existing car park located the curtilage of a retail park; with the proposal offering no material change in use. It has also been demonstrated that the proposal will not generate any adverse impacts that would significantly and demonstrably outweigh the benefits of the Proposed Development, when assessed against planning policy as a whole.
- 8.8 Overall, the Proposed Development is in accordance with the Local Plan Strategy, the PPW and Future Wales National Plan and as there are no material considerations that indicate otherwise, permission should be granted.



PLANNING

DPP Planning

DESIGN

11-13 Penhill Road

Cardiff

CF11 9PQ

Tel: 029 2280 4890

E-mail: info@dppukltd.com

www.dppukltd.com

CARDIFF

LEEDS

LONDON

MANCHESTER

NEWCASTLE UPON TYNE