enzygo
environmental consultants

Planning, Design & Access Statement

Proposed EV Supercharger Infrastructure and Substation

The Old Post Office, 600 Huddersfield Road, Haigh, Barnsley, S75 4DE

Tesla Motors Ltd

CRM.3030.014.PL.R.001

'Experience and expertise working in union'

enzygo.com

The Old Post Office, Huddersfield Road, Haigh, Barnsley, S75 4DE
Tesla Motors Ltd

Contact Details:

Enzygo Ltd. (Bristol Office)
The Byre
Woodend Lane
Cromhall
Gloucestershire
GL12 8AA

tel: 01454 269237
email: tom.baguley@enzygo.com
www: enzygo.com

Planning, Design and Access Statement

Project:	CRM.3030.014
For:	Tesla Motors Ltd
Status:	Final
Date:	May 2023
Author:	Rowan Scott, **Graduate Planning Consultant** Tom Baguley, **Planning Consultant**
Reviewer:	Kevin Parr, **Company Director**

Contents

1.0 Introduction

1.1 Introduction

1.1.1 This combined Planning, Design and Access Statement (PDAS) supports a planning application made by Tesla Motors Ltd (the 'Applicant') for a proposed development of 12no. Tesla electric vehicle (EV) charging points, 3no. supercharger equipment cabinets, substation infrastructure and associated landscaping.

1.1.2 The site falls within the administrative boundary of Barnsley Metropolitan Borough Council and forms a small area of the existing car park serving The Old Post Office Restaurant/Public House. The site is positioned between the M1 Motorway and Huddersfield Road which connects to junction 38 of the M1; approximately 250m north of the site.

1.1.3 With increasing consumer demand and the greater availability of electric models, the number of electric cars in the UK is growing at a rapid rate. As of the end of April 2023, there are now over 760,000 fully electric cars on UK roads and a further 490,000 plug-in hybrids[1] (Figure 1.1).

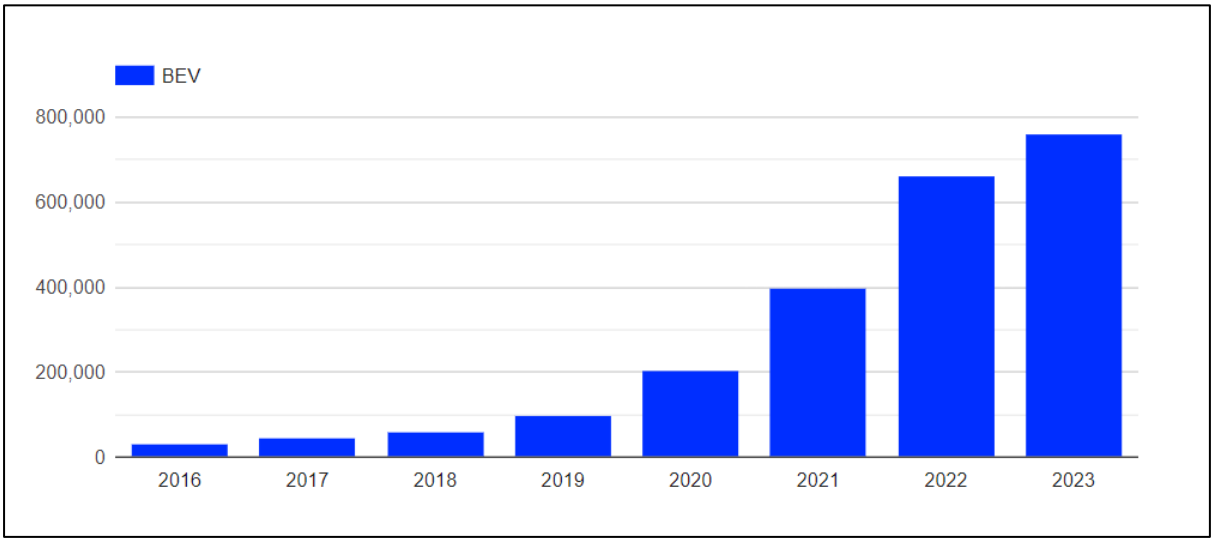

Figure 1.1. Cumulative Number of Battery-Electric Cars in the UK [2016 to 2023] [Source: SMMT, April 2023 – Zap-Map]

1.1.4 The sales of petrol and diesel vehicles have been steadily declining since 2014, while the sales of electric cars have grown exponentially, with sales growing by 43% from 2019. Research shows that the number of EVs sold in a week in 2021 was higher than the amount sold in the year 2012

[1] https://www.zap-map.com/ev-stats/ev-market/#:~:text=EV%20market%20stats%202023&text=With%20increasing%20consumer%20demand%20and,further%20490%2C000%20plug%2Din%20hybrids.

as a whole. Based on the 2021 census data, over half of the younger drivers in the UK have indicated a likelihood to switch to electric cars in the next decade.

1.1.5 Conducted between September and October 2021, the census survey highlighted that 44% of all petrol, diesel and hybrid drivers were interested in switching to an all-electric vehicle during the next decade[2]. It is also forecasted that EVs will comprise 70% of all new car sales in 2040, this projection having doubled in the last five years.

1.1.6 As electric car sales continue to rise so does the demand for electric charging in the UK. Research shows that a target of 300,000 electric vehicle chargers will be made publicly available in the UK by 2030.

1.1.7 Most early adopters primarily relied on home EV charging (some people still do), but with more people making the switch to EVs, there is a real need for more accessible public charging points. The continual increase reinforces the need for a reliable EV charging network within the county and across the UK. As such, the proposed development would strengthen the existing infrastructure on the strategic road network to support the increasing usage of electrical vehicles. Electrical vehicle charging points form vital infrastructure in facilitating the transition to ultra-low emission vehicles and securing the UK Government's net zero carbon targets.

1.1.8 A good supply and distribution of EV charging points is essential to encourage more drivers to purchase electrical vehicles and use them on a day-to-day basis. Specifically, locating charging points on arterial routes near convenient and desirable amenities, such as the proposed location, will ensure electric vehicle drivers can travel for long distances with confidence that they can recharge on route; thus, making electric cars an attractive alternative to conventional fossil fuelled vehicles. En-route charging points are currently the 4th most prevalent type of charging point – behind 'destination', 'on-street' and 'other', accounting for 6% of all EV chargers[3].

1.1.9 The site comprises existing car parking spaces along the southern boundary of the car park upon which the proposed charging spaces would be located. The substations and equipment cabinets would be positioned within the southwest corner of the car park.

1.1.10 The site is also located within Barnsley's Green Belt designation and therefore careful consideration has been made as to the impacts that this development may have on the Green

[2] https://www.drive-electric.co.uk/press/discover-what-the-future-of-electric-vehicles-looks/

[3] https://www.drive-electric.co.uk/press/discover-what-the-future-of-electric-vehicles-looks/

Belt (Chapter 6). Relevant technical assessments have been undertaken to demonstrate that the proposed development is appropriate for the site location. Where potential impacts are identified, mitigation measures have been proposed to ensure that the development does not result in significant or adverse environmental impact (Chapter 7).

1.1.11 The site location and site boundary are shown in drawing CRM.3030.014.D.001 – Site Location Plan and CRM.3030.014.D.002 – Site Boundary Plan. The Site Location Plan is appended at **Appendix A**.

1.2 Importance of EV Charging Infrastructure

1.2.1 The UK Government has committed to net zero emissions by 2050. Transport is the UK's largest CO_2 emitting domestic sector and 91% of UK transport emissions come from road transport[4]. If the UK economy is to achieve net zero emissions by 2050, it has to decarbonise road transport. The recent rapid increase in both the supply of, and the demand for, EVs means that charging infrastructure now stands as the single biggest challenge to decarbonisation.

1.2.2 The UK's electric vehicle (EV) charging infrastructure is continually growing and evolving to meet the needs of EV drivers. At the end of September 2022, there were 34,860 electric vehicle charging points across the UK, across 20,888 charging locations. This represents a 35% increase in the number of charging devices since September 2021[5]. However, the electric vehicle market is booming, at a pace far greater than the rollout of EV charging infrastructure, according to the UK's Electric Vehicle Infrastructure Strategy (2022)[6]. The UK government is aiming to tackle this growing disparity with a new Electric Vehicle Infrastructure Strategy, which it says includes a total of £1.6 billion of investment.

1.2.3 The decarbonisation of the road transport sector is now accelerating at an astonishing pace, and the UK is in the vanguard of this change. In November 2020, the former UK Prime Minister Boris Johnson MP put the UK on course to be the fastest nation in the G7 to decarbonise cars and vans, announcing that all new petrol and diesel cars and vans will be phased out by 2030.

1.2.4 The Government is supporting this pledge with a zero-emission vehicle mandate which will provide certainty over the scale and pace of the transition to consumers, energy providers, the charge point industry and investors, vehicle manufactures and supply chains. EVs will improve

[4] https://www.gov.uk/government/publications/uk-electric-vehicle-infrastructure-strategy

[5] https://www.zap-map.com/statistics/

[6] https://www.gov.uk/government/publications/uk-electric-vehicle-infrastructure-strategy

air quality in our towns and cities, reduce harmful emissions, and offering cleaner driving environment conditions.

1.2.5 The UK recognises that a focus on vehicles is only half of the challenge. A suitable charging infrastructure network is fundamental to delivering net zero road transport.

1.3 Climate Emergency

1.3.1 The UK Government has introduced a number of policies and initiatives aimed at cutting exposure to air pollutants, improving local air quality and reducing greenhouse gas emissions. In August 2021, the Government announced plans to accelerate the phasing out of petrol and diesel cars. This will involve:

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

1.3.2 At a local level, Barnsley Metropolitan Borough Council declared a climate emergency in September 2019. Following this declaration, Barnsley MBC produced two programmes to help Barnsley reduce its carbon emissions. “Zero 40” sets out the Council’s ambition to become net zero by 2040 and “Zero 45” is a programme to support the whole borough to become net zero by 2045 or sooner. As part of these programmes, Barnsley MBC have produced their first Sustainable Energy Action Plan (SEAP) and are working on a variety of projects to reduce carbon emissions. Transport has been a key priority for the Council, and the Council have implemented a scheme to install electric vehicle charging in public car parks across the borough using funding from the Office for Zero Emission Vehicles (OZEV) and the On-Street Residential Chargepoint Scheme (ORCS) to provide EV charging for residents without access to off-street parking.

1.3.3 At a regional scale, the South Yorkshire Combined Mayoral Authority published a Transport Strategy in 2019 with the aim of improving and decarbonising transport within South Yorkshire. Within this strategy it is highlighted that improving EV charging infrastructure across the County is a key priority.

1.4 Format of the Planning Application

1.4.1 This Planning Application contains the following documents:

- Completed Planning Application Forms;
- Completed Ownership Certificates;
- Site Location Plan [Drg. No. CRM.3030.014.PL.D.001]
- Site Boundary Plan [Drg. No. CRM.3030.014.PL.D.002]
- Existing Site Layout Plan [Drg. No. CRM.3030.014.PL.D.003]
- Proposed Site Layout Plan [Drg. No. CRM.3030.014.PL.D.004]
- Site Elevation Plan [Drg. No. CRM.3030.014.PL.D.005]
- Soft Landscaping Plan [Drg. No. CRM.3030.014.ENZ.XX.00.L.45.101.PL01]
- Planning, Design and Access Statement [This Statement]
- Noise Impact Assessment
- Arboricultural Report
- Ecological Impact Assessment [EcIA]
- Biodiversity Net Gain Calculation
- Preliminary Risk Assessment and Coal Mining Assessment

2.0 Introduction to the Site and Surrounding Context

2.1 Introduction

2.1.1 The application site lies within the administrative boundary of Barnsley Metropolitan Borough Council on land within The Old Post Office, Huddersfield Road, Haigh, Barnsley, S75 4DE.

2.1.2 The proposed development is situated at Grid Reference 429872 (X) 411569 (Y), with the nearest postcode being S75 4DE. A Site Location Plan and Site Boundary Plan are submitted with the planning application. An extract of the Site Boundary Plan is included in Figure 2.1 below. An aerial image of the application site is included at Figure 2.2 below.

Figure 2.1. Site Boundary Plan

Figure 2.2. Aerial Image of the Application Site (site denoted by Red Star)

2.2 The Site and Surrounds

2.2.1 The application site is located within the car park of The Old Post Office – a restaurant and Public House which attracts customers from nearby towns and villages of northern Barnsley, as well as people taking a break from their journey along the M1 motorway. The site is also in close proximity to the Yorkshire Sculpture Park, a major regional tourist attraction which lies approximately 2km driving distance away.

2.2.2 The site is strategically positioned just off from Junction 38 of the M1 motorway, which lies between Barnsley and Wakefield and is the primary connecting route between Sheffield and Leeds. The site is therefore well positioned in relation to densely populated areas and the strategic road network – where demand for EV charging infrastructure is highest.

2.2.3 The application site comprises existing car parking spaces located at the southern boundary of the car park. The car park itself is enclosed by the M1 to the east and Huddersfield Road to the west which are both at higher elevations than the site, meaning that the site is well-enclosed by the surrounding topography. Existing mature tree planting on the bank to the east and on

the southern boundary also screen the site from the east and south and further enclose the site from surrounding views.

2.2.4 To the north of the site is the Old Post Office Pub/Restaurant, beyond which is an area of hardstanding used for the storage of large vehicles and fairground rides. To the south of the site is an agricultural field separated by a mature tree line along the southern boundary of the car park. Immediately to the east of the car park is an access track (leading towards Riverside Farm) which runs parallel to the eastern boundary of the car park. This is then followed by the M1 motorway which is separated by a soft landscape buffer consisting of tree planting along the rising embankment. To the immediate west of the car park is an area of soft landscaping and grassed bank which leads up towards the access road joining on to Huddersfield Road.

2.2.5 The wider area mostly consists of open agricultural land. However, the low profile of the site, in conjunction with its proximity to Junction 38 of the M1 means that the site itself cannot be seen within this context. The nearest residential dwellings can be found approximately 140m to the southwest of the site, along Huddersfield Road.

2.2.6 The site is not allocated in the Local Plan and there are no allocations nearby to note.

Figure 2.3. Existing Site [View Facing North-East]

Figure 2.4. Existing Site [View Facing South-East]

2.3 Site Access

2.3.1 The proposed development will utilise the existing site access from Huddersfield Road – an access arrangement that Barnsley Metropolitan Borough Council have previously considered as suitable for customers entering the site's existing use by motor vehicles.

2.4 Trees and Landscape Planting

2.4.1 A tree survey in accordance with BS 5837:2012 was carried out by Enzygo Ltd in March 2023. Five trees and five tree groups, as well as one hedgerow, were surveyed within the site and within 15m of the site boundary, comprising a mix of native and non-native species, with the majority being semi-mature with a BS retention category B and C (moderate and low value).

2.5 Sensitive Receptors in the Vicinity of the Site

2.5.1 A review of statutory and non-statutory designated sites within the locality has been undertaken using the Multi Agency Geographic Information for the Countryside (MAGIC) database operated by DEFRA (Table 1).

Table 1: Statutory and Non-Statutory Designations (Source: MAGIC, DEFRA)

Location	Site of Interest
Statutory and Non-statutory designations within site boundary	• Barnsley Green Belt
Statutory designations within 1km of the site	• Local Nature Reserve (Bretton Country Park) • Several grade II listed buildings (Closest is Swithen House c.300m to the south of the site) • Bretton Hall Registered Park and Garden

2.6 Flood Risk

2.6.1 The application site is located within the Flood Zone 1 for fluvial flooding, which is very low risk. However, the site is within a medium risk area for surface water flood risk.

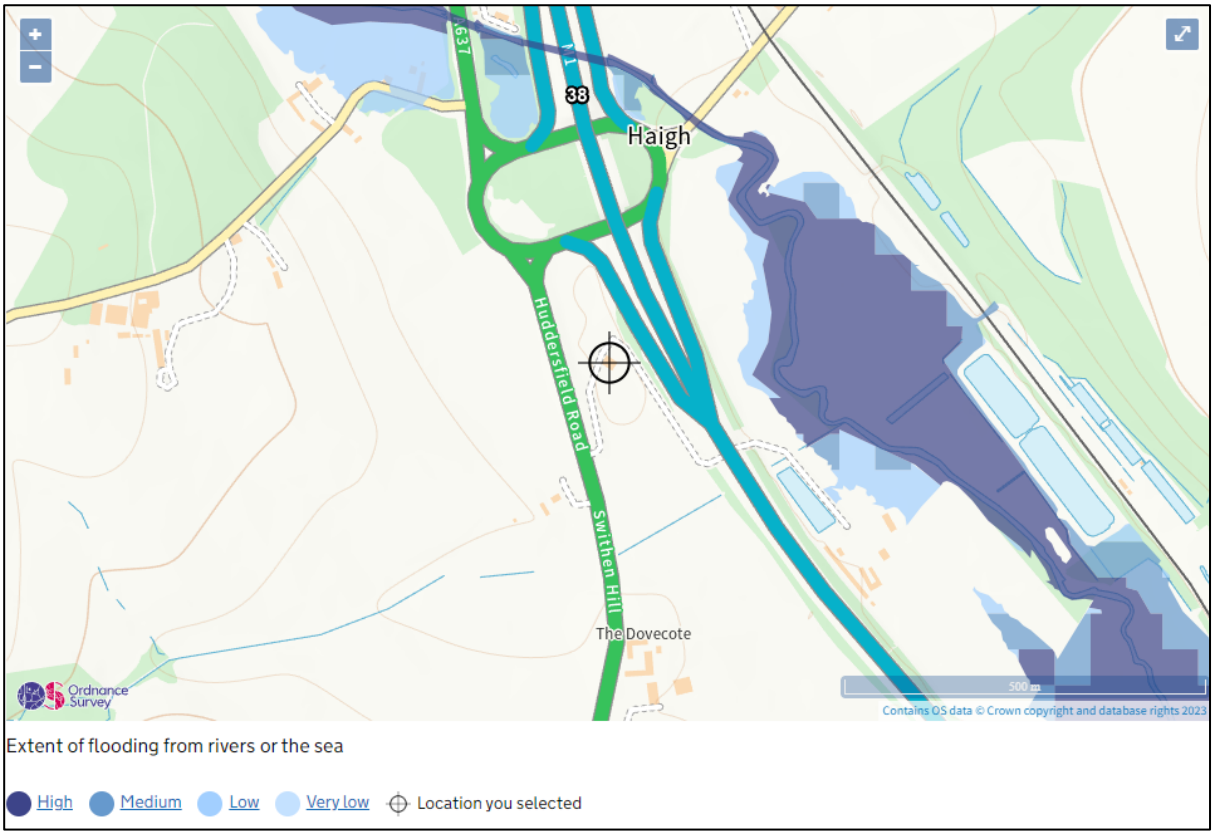

Figure 2.5. EA Flood Map for Planning

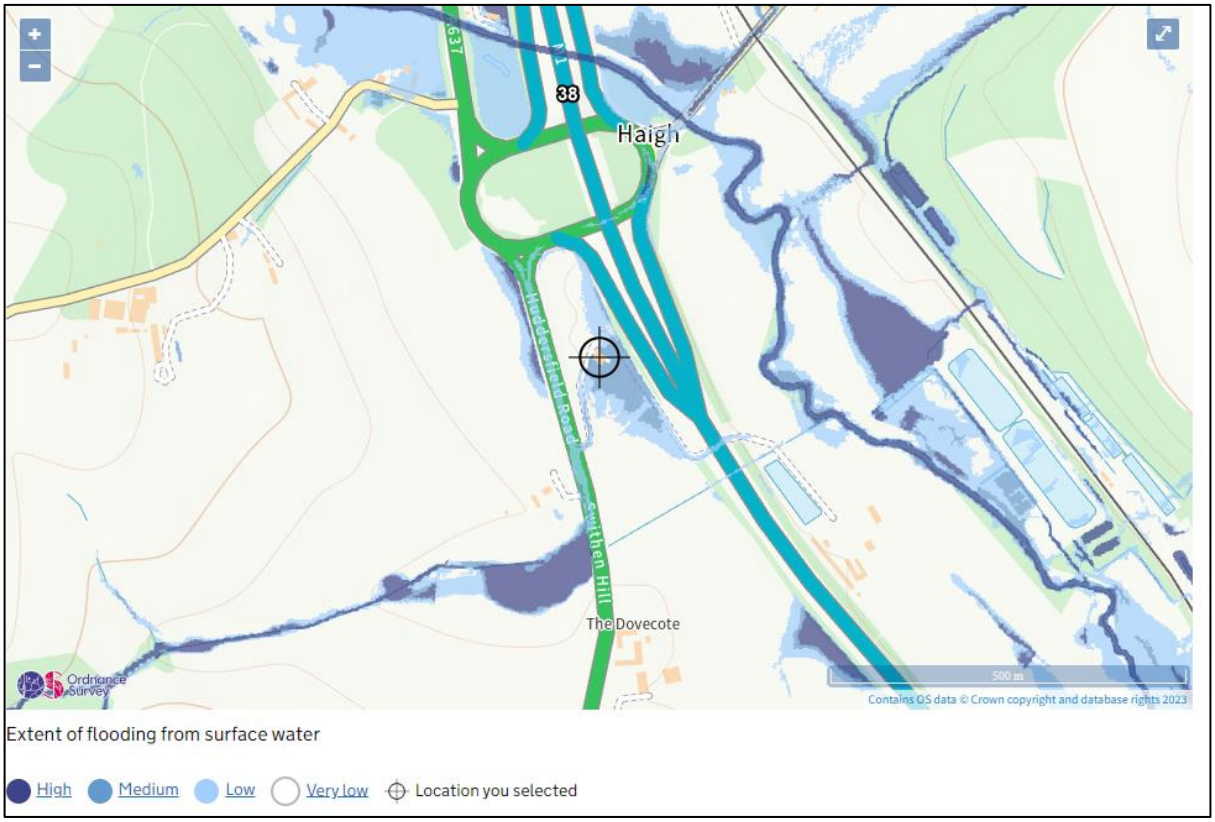

Figure 2.6. EA Surface Water Map

2.7 Planning History

2.7.1 A search of Barnsley Metropolitan Borough Council's planning portal has indicated that there are numerous historic planning applications associated with the site boundary. However, none of these are relevant to this application.

Table 2: Planning History

Reference	Description
2010/0891	Replacement of existing sewage treatment plant with a sewage dumping station and a Kee NuDisc 1400. Approved 2010.
2007/1173	Alterations to main entrance of public house and formation of access ramp. Approved 2007
B/98/0870/DT	Hotel Development. Refused 1999
B/95/1271/DT	Use of land for deposit/collection of pallets (retrospective). Refused 1995.
B/92/0746/DT	Use of land for car boot sales and associated car parking up to 52 Sundays a year. Refused 1992

3.0 Development Proposals

3.1 Introduction

3.1.1 This combined Planning Statement and Design and Access Statement supports a planning application made by Tesla Motors Ltd for the development of 12no. EV superchargers, 3no. equipment cabinets and 1no. DNO substation. All charging units are universal and can be used by any EV user.

3.1.2 The site location is shown on the accompanying Site Location Plan drawing (CRM.3030.014.PL.D.001).

3.1.3 Within this chapter, the nature of the development and details of the plant and equipment to be located on the site is provided.

3.2 Introduction to Electric Vehicle Charging Points

3.2.1 Electric vehicle charging points are vital infrastructure to support the transition to electric vehicles. A good supply and distribution of charging points is essential to encourage more drivers to purchase electric vehicles and use them on a day-to-day basis. Specifically, locating charging points on main arterial route networks, where large numbers of people are often driving long distances, is necessary to ensure drivers are confident that they will be able to recharge vehicles when required, whilst also having access to the required welfare facilities available.

3.2.2 The Office for Zero Emissions (OZEV) is working across Government to support the early market for ultra-low emission vehicles (ULEV), which will help reduce greenhouse gas emissions and air pollution on UK roads as well as supporting economic growth.

3.2.3 The “Government vision for the rapid charge point network in England” (policy paper, 2020) states that the Rapid Charging Fund was announced in March 2020’s Budget as part of a £500 million commitment for EV charging infrastructure. The purpose of the programme was to ensure that there is a rapid-charging network ready to meet the long-term consumer demand for electric vehicle charge points ahead of need. By 2030, the Government expects the network to be extensive and ready for more people to benefit from the switch to electric cars. Around 2,500 high powered charge points are planned across England’s motorways and major A roads. The proposed development will help the Government meet these prescribed targets.

3.3 Grid Connection Process

3.3.1 Grid capacity and availability of a point of connection is a real constraint to the roll-out of EV charging infrastructure. Even where there is a demand it is unlikely that a charge point will always be able to be located in the most suitable or convenient place due to the location of possible connection points to the Grid. There is a risk that significant uptake of ULEVs and, consequently provision of charge points, could be constrained by Grid capacity issues.

3.3.2 All sites selected for electric vehicle charging infrastructure must be located in close proximity to a Point of Connection (PoC) with available capacity for import from the Grid. As Local Authorities do not address the locational requirements for such facilities in their development plans, authorities should be flexible by considering sites on their merits. In order for the UK to meet the ongoing and clearly evidenced requirement for electric vehicle charging points (300,000 by 2030), identified Point of Connections with sufficient capacity adjacent to major UK highway infrastructure need to be identified and utilised.

3.3.3 In this instance, the proposed development would connect into the PoC adjacent to the M1, approximately 50m south-east of the application site. Whilst the site is located within the Green Belt, the application site has been chosen partly due to its proximity to the identified Grid connection.

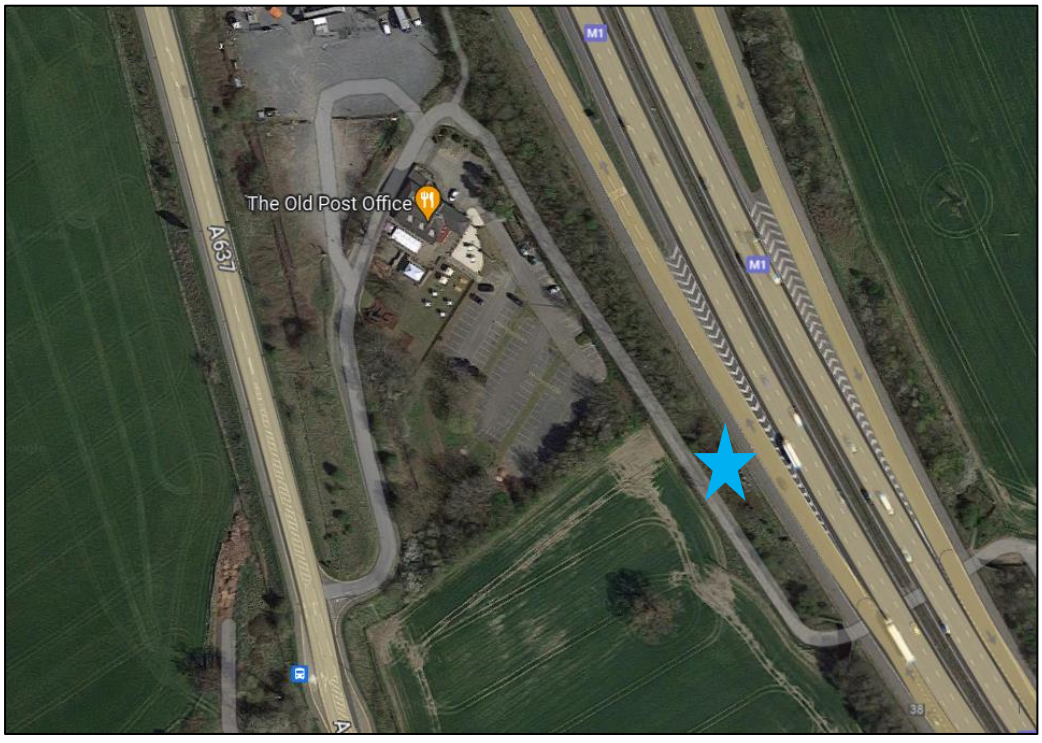

Figure 3.1. Point of Connection (Blue Star)

3.3.4 To connect to the Grid network, a developer must go through several stages. The initial step is to identify an area of the Grid network in a region that has sufficient capacity. According to Tesla, 50% of Grid applications made prove to be unfeasible due to Grid capacity constraints and distance from proposed charging hubs, thus when appropriate sites become available with sufficient capacity, it is vital that such development sites are taken forward to ensure maximum use of the Grid and so provide a better nationwide coverage of EV charging points. The site selection is entirely led by Grid connections. Alternative sites are considered throughout the development process, but the ability to relocate the site is removed once the Grid offer is accepted.

3.3.5 Once a PoC has been established, an appropriate location for the proposed development must be identified by the developer. The costs of infrastructure and loss of energy efficiency will increase over longer distances, thus sites which are too far from PoC are not viable. A site search radius of 500m (+100m) buffer is used to find development sites within proximity to the PoC. In this case, the PoC is rurally located, with no suitable developed sites available within 500m.

3.3.6 Importantly due to the Green Belt context of the PoC, a developed site large enough to accommodate the development is sought. As covered later in this report, the preference is to develop an existing car park serving an existing destination – such as a retail unit, hotel or such other facility which attracts visitors, with preference being to be within a short distance from major UK highway infrastructure to also support en-route charging. The proposed development site would support en-route charging (users of the M1) as well as destination charging (customers of The Old Post Office).

3.3.7 By drawing a 600m radius around the PoC (Figure 3.2), it is clear that the only existing developed and suitable car parking area within this radius is at The Old Post Office. The surrounding area within a 600m radius otherwise comprises agricultural fields. It is not preferable to develop a greenfield site as opposed to a developed area.

Figure 3.2. PoC with 600m Radius

3.4 Site Selection

3.4.1 The site has been identified as particularly suitable for the development of EV charging infrastructure for several reasons:

- Referring to Figure 3.3 (below), there is a lack of existing ultra-rapid (100kW+) supercharging infrastructure along the M1 in this region. The M1 motorway runs in a north-south direction to the east of the site and is a major arterial highway connecting the East Midlands, South Yorkshire and Leeds. A review of ZapMap[7] indicates that there are existing high-powered EV chargers at Moto Services at Woodley Edge, but a general under provision of high-powered EV chargers along the M1 motorway. Given the strategic importance of this motorway carrying northern and southern bound traffic through Yorkshire and the East Midlands, it is forecast that demand along this stretch of

[7] https://www.zap-map.com/live/

the M1 would be high and the site is well placed for the provision of additional EV charging infrastructure to meet this demand.

- As well as being adjacent to the M1 motorway, the site is adjacent to the A637 Huddersfield Road – an A road connecting the centre of Barnsley to the A642, running from Wakefield to Huddersfield. A concerted effort has been made to locate the proposed development at a convenient location along an arterial route to ensure drivers have a convenient location to recharge enroute to their destinations.

- It takes a minimum of 30 minutes for a full recharge for vehicles to continue on with a journey, with the typical supercharging experience presently lasting between 35-40 minutes. Whilst some users stay in their vehicles whilst charging, it is much preferable to locate the superchargers in a location where users can have access to food, drink and amenities, which also provides further indirect economic benefits.

- The proposed superchargers are to be located within the car park of The Old Post Office restaurant. Whilst it is expected that the main user base will be from en-route charging from the M1 and A637, the development at this location would also provide for EV charging for customers of The Old Post Office – a 'destination' charging hub.

- Site selection for EV charging is constrained by available connection to the grid. In this case, there is available grid connection capacity at a point of connection (PoC) 50m to the south-east of the site. Locating proposals as close as practically possible to a PoC removes the need for a long underground cable route, which would cause further disturbance and losses to efficiency.

- The sites position adjacent to the M1 removes the need for EV users to travel afar in search for EV chargers – reducing potential traffic demand and improving sustainability.

- There are no other existing car parks within 600m of the identified PoC that are considered suitable for the development.

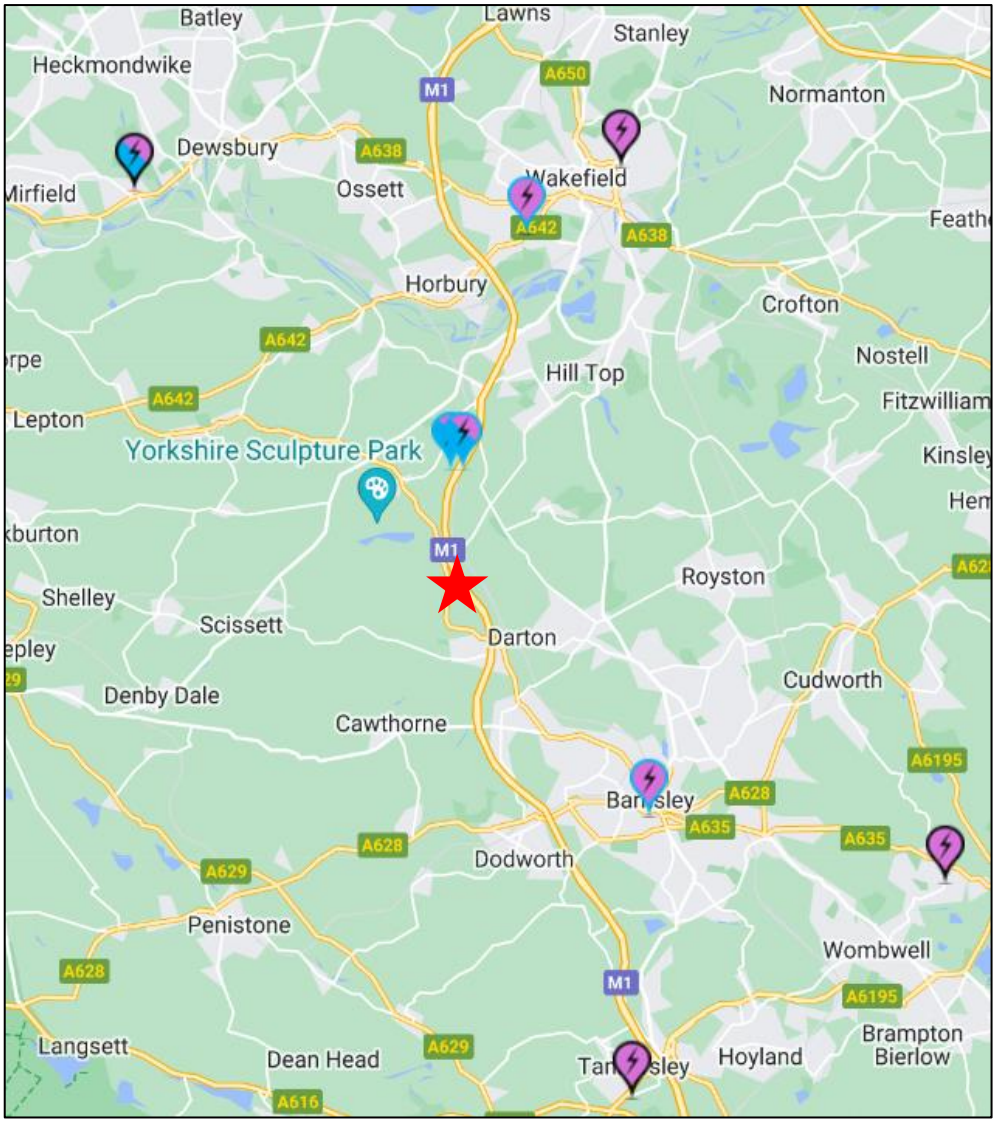

Figure 3.3. Location of Existing High-Powered (100kW+) EV Chargers in the Wider Area [Site Location Shown by Red Star]

3.5 Site Layout

3.5.1 The plans accompanying this application show the site layout and elevations in detail. Drawing CRM.3030.014.PL.D.002 shows the Site Boundary Plan and drawing CRM.3030.014.PL.D.004 shows the Proposed Site Layout. The following equipment is located within the red line boundary:

- 12no. Tesla Supercharger Stands
- 3no. Equipment Cabinets
- 1no. DNO Substation

3.5.2 The proposed EV charging stands will be positioned within existing car parking spaces. The equipment cabinets and substation will be positioned on an area of vacant hardstanding within the car park.

4.0 Design and Access

4.1 Introduction

4.1.1 This section explains how the development proposal fits within the wider site and its setting and demonstrates that the site can be adequately accessed by prospective users.

4.1.2 The proposed site layout ensures a functional and efficient use of the site. The plans and drawings which accompany this application provide details and the scale and siting of the equipment within the proposed plan. The positioning of the equipment ensures a functional site that allows for safe vehicle access to the EV charging points easily, and maintenance vehicles can safely access the substation as required.

4.2 Appearance and Materials

4.2.1 The Superchargers are of a minimalist design, oval shaped with low level advertisement lighting.

4.2.2 All Tesla Superchargers are of a consistent design as Tesla has a strong brand identity that is consistent across all their site both within the UK and globally. Figure 4.1 presents a photograph of another Tesla site – showcasing the appearance of the charging stands when in situ.

4.2.3 The Tesla V3 charging stands measure a height of 1.68m. The proposed Tesla equipment cabinets measure a height of 2.15m.

Figure 4.1 Example Tesla V3 Superchargers

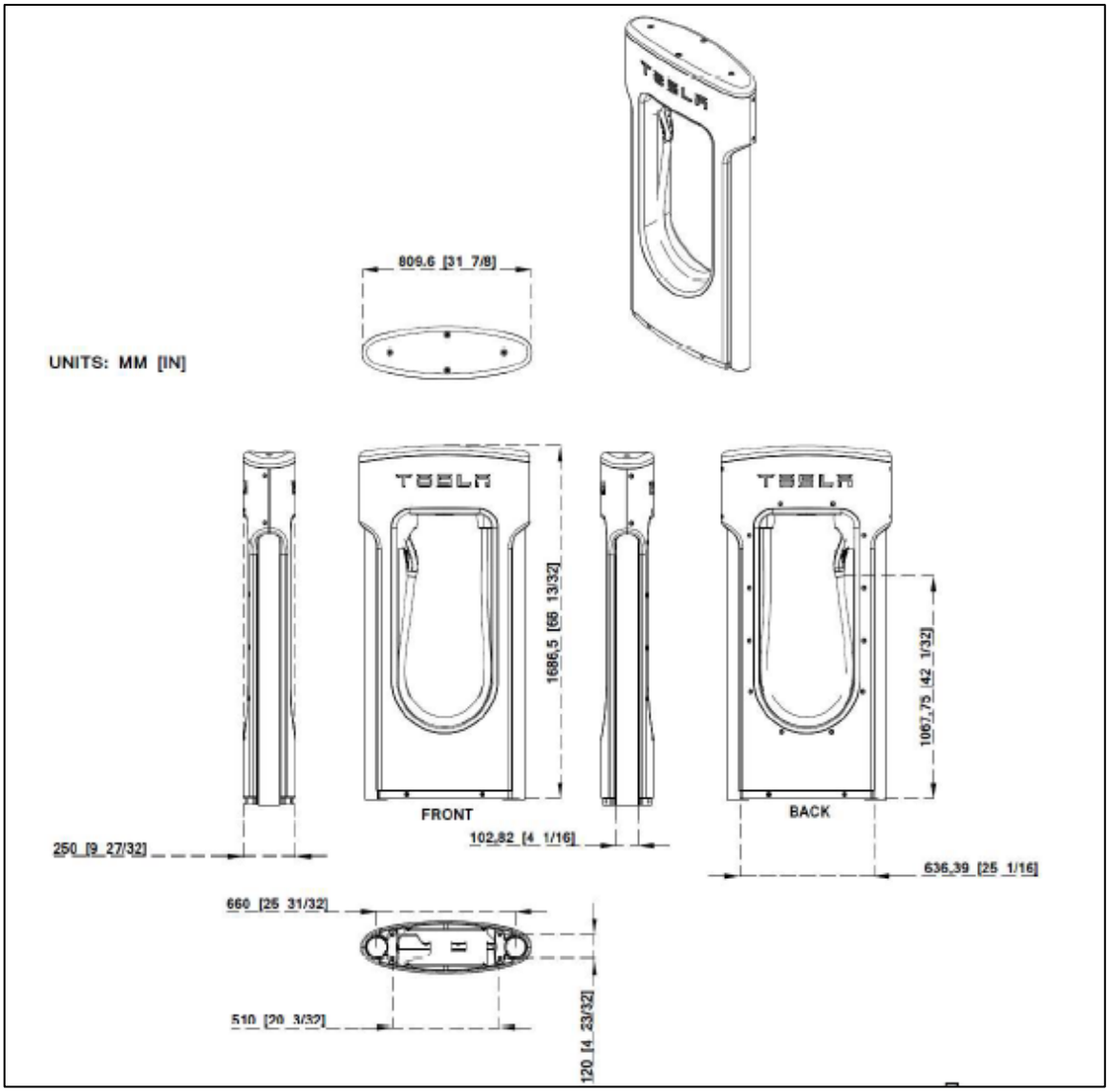

Figure 4.2. Elevational Drawings of Proposed Tesla V3 Superchargers

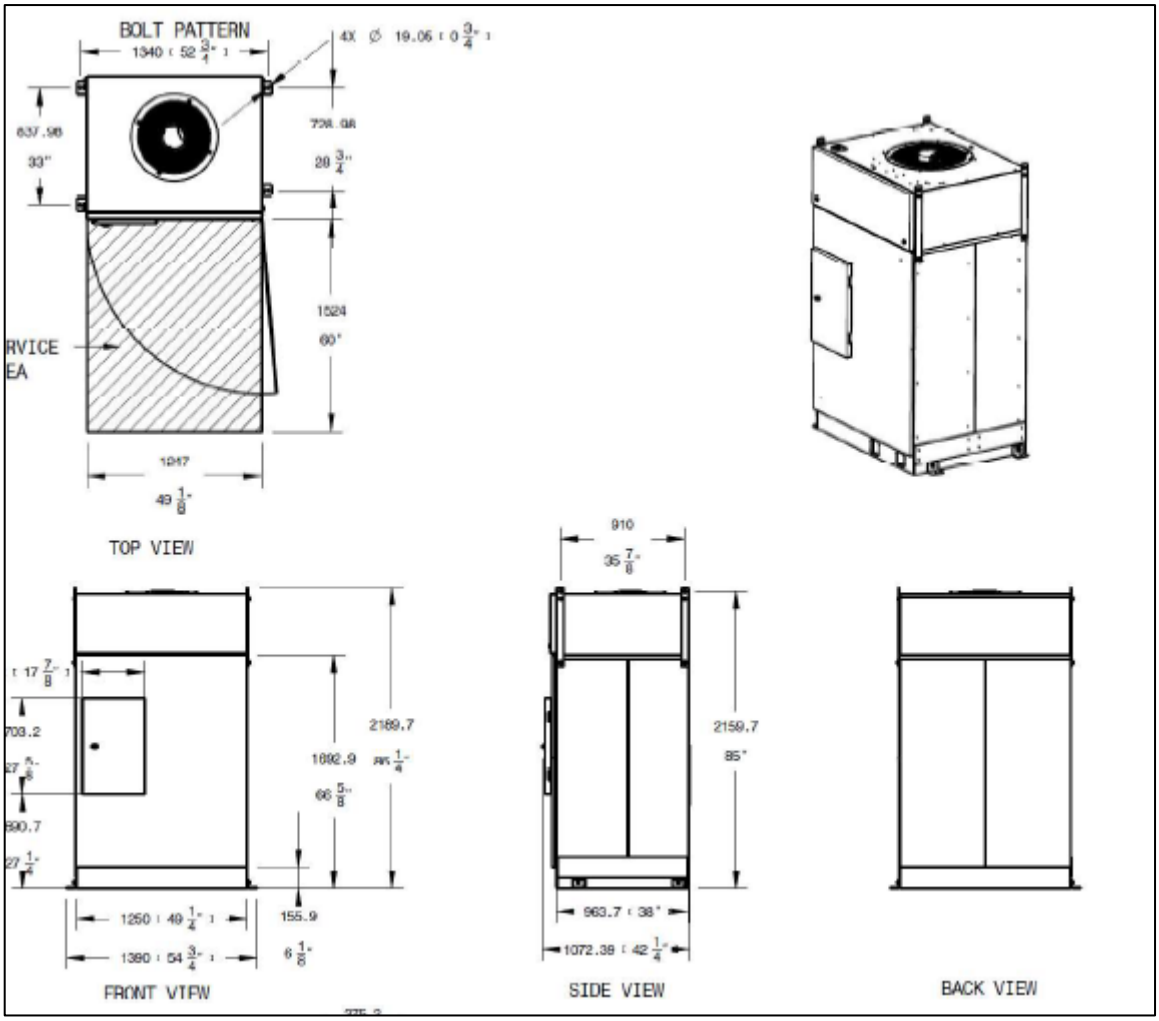

Figure 4.3. Elevational Drawings of Proposed Tesla Equipment Cabinets

4.3 Landscape Design

4.3.1 A Planting Plan has been prepared for this planning application. The Planting Plan integrates the existing green infrastructure network with the proposed new planting whilst complementing the existing trees, hedgerows and soft landscaping around the site. Wooden fencing would screen the substation.

4.3.2 Planting to the north and west of the development site would act to visually screen the development from Huddersfield Road and introduce further soft landscaping across the car park.

4.3.3 As well as limiting the visual impact of the substation by screening the development, the planting strategy also aims to increase biodiversity while also respecting and enhancing the heritage and character of the site location. It is proposed to plant a 36m native species hedge to the south-east of the proposed chargers, to create easy-to-maintain car park edge,

preventing encroachment of existing vegetation to the South and closely matching existing semi-native hedge around car parking spaces across the site. In addition, it is proposed to plant 4no. Emerald Queen Norway maple trees on an existing verge within the car park. A 21m beech hedge is proposed is around the DNO substation and equipment cabinets.

4.4 Access

4.4.1 There will be no alterations to the existing site access arrangements. Users will enter into the existing car park area to the north via an access track taken from Huddersfield Road.

4.5 Summary and Conclusion

4.5.1 This section confirms that the design of the facility is in keeping with the surrounding land uses and context of the application site. The scale and massing of the proposed units and associated infrastructure is modest, utilising an existing car park area and incorporates an enhanced landscape planting scheme.

5.0 Planning Policy

5.1 Introduction

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

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

- Barnsley Local Plan (adopted January 2019)

5.1.3 The site does not fall within a neighbourhood plan area.

5.2 Barnsley Local Plan [2019]

5.2.1 The policies that are pertinent to the proposed development are as follows:

- Policy SD1 Presumption in Favour of Sustainable Development
- Policy GD1 General Development
- Policy T1 Accessibility Priorities
- Policy T5 Reducing the Impact of Road Travel
- Policy D1 High Quality Design
- Policy HE1 The Historic Environment
- Policy GB1 Protection of Green Belt
- Policy CC1 Climate Change

5.3 National Planning Policy Framework

5.3.1 The National Planning Policy Framework (NPPF) is the current national planning policy document in England, published in 2021.

Achieving Sustainable Development

5.3.2 Paragraph 8 of the NPPF states:

"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 opportunities can be taken to secure net gains across each of the different objectives):

- ***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;

- ***a social objective*** *–to support strong, vibrant and healthy communities, by ensuring that sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and*

- ***an environmental objective*** *– to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy."*

5.3.3 Paragraph 11 of the NPPF states:

'Plans and decisions should apply a presumption in favour of sustainable development.

For ***decision-taking*** *this means:*

c) approving development proposals that accord with an up-to-date development plan without delay; or

d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:

i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or

ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.'

Promoting Sustainable Transport

5.3.4 Paragraph 112 of the NPPF goes on to advocate for the developments to 'be designed to enable the charging of plug-in and other ULEV's in safe, accessible and convenient locations'. The Old Post Office is strategically located off the M1 and A637. As such the site is considered to meet the requirements of the above policy in terms of location.

Achieving Well Designed Places

5.3.5 Paragraph 131 states that 'Planning policies and decisions should ensure that appropriate measures are in place to secure the long-term maintenance of newly-planted trees, and that existing trees are retained wherever possible.'

Protecting Green Belt land

5.3.6 Paragraph 147 states that '*Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances*.'

5.3.7 Paragraph 148 states that '*when considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations*.'

5.3.8 Paragraph 149 sets out that the construction of new buildings within the Green Belt should be regarded as 'inappropriate' unless the ensuing conditions of Paragraph 149 are met.

5.3.9 However, Paragraph 150 states that '*local transport infrastructure which can demonstrate a requirement for a Green Belt location'* would not be inappropriate in the Green Belt provided the proposal preserves its openness and does not conflict with the purposed of the land within it. As established in Chapter 6 of this Statement, the proposals do not reduce the openness of the Green Belt by virtue of being minor development within an existing car park which is well screened by natural topography and vegetation in this area. The requirement for EV charging infrastructure at this location is derived from the site's proximity to the strategic highway network, lack of sufficient existing EV charging points in the area, proximity to a PoC with connection capacity, and proximity to supporting uses such as The Old Post Office. There is not a more suitable site in the surrounds that a) is outside of the green belt, b) is closer to a PoC with capacity, c) delivers such benefits to local businesses and d) is situated within an extant developed area, removing the requirement for greenfield development.

5.3.10 In addition, Paragraph 151 deals with renewable energy projects within the Green Belt which would be classed as inappropriate development, however developers are able to demonstrate very special circumstances if projects are to proceed. '*Such very special circumstances may include the wider environmental benefits associated with increased production of energy from renewable resources*.'

Meeting the Challenge of Climate Change, Flooding and Coastal Change

5.3.11 Paragraph 152 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.' The Development will strengthen EV charging infrastructure in the area, as the Applicant has identified this area as lacking in sufficient EV charging infrastructure. EV charging points are vital infrastructure in facilitating the transition to ultra-low emission vehicles and securing the Government's net zero carbon targets.

5.3.12 Paragraph 158 states that '*when determining planning applications for renewable and low carbon development, local planning authorities should*:

a) not require applicants to demonstrate the overall need for renewable or low carbon energy, and recognise that even small-scale projects provide a valuable contribution to cutting greenhouse gas emissions

b) approve the application if its impacts are (or can be made) acceptable'.

5.4 National Climate Change Related Material Considerations

Climate Change Act 2008

5.4.1 The Climate Change Act was passed in the UK in November 2008. It sets out emission reduction targets that the UK must comply with legally. It represents the first global legally binding climate change mitigation target set by a country.

5.4.2 The Act committed the UK to reducing its greenhouse gas emissions by 80 per cent by 2050, compared to 1990 levels. However, this target was made more ambitious in 2019 when the UK became the first major economy to commit to a 'net zero' target. The new target requires the UK to bring all greenhouse gas emissions to net zero by 2050.

5.4.3 The Act also provides a system of carbon budgeting, to help the UK meet its targets through a series of five-year carbon budgets.

Paris Agreement on Climate Change (2016)

5.4.4 The UK commitment to the reduction of greenhouse gas emissions through the ratification of the United Nations Framework Convention on Climate Change (UNFCCC) Paris Agreement in November 2016. The Paris Agreement committed its signatories to "hold the increase in the global average temperature to well below 2oC above pre-industrial levels and pursuing efforts to limit the temperature increase to 1.5oC above pre-industrial levels''. The agreement, that was adopted by nearly every nation, also made it clear that the global economy will need to be zero-carbon by the second half of the 21st Century.

5.4.5 Five years after the commitments made in the Paris Agreement several research studies have suggested that at current rates of action by Governments around the world the average global temperatures are still likely to increase above 2°C. Further action is rapidly required to reduce global temperature rises.

The Clean Growth Strategy (2017)

5.4.6 The Government's Clean Growth Strategy sets out how it envisages the delivery of the clean, green economic growth needed to combat global warming. It identifies the policies necessary to drive a significant acceleration in the pace of the UK's decarbonisation to achieve the 2032 carbon budget targets that in turn will keep us on track to achieve the net zero target by 2050.

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

National Infrastructure Strategy (November 2020)

5.4.8 The national infrastructure strategy sets out the government's plans to deliver vital infrastructure across the UK, with a focus on achieving net zero emissions by 2050. Part of this infrastructure plan includes investing £1.3 billion in charging infrastructure to accelerate the adoption of EVs ahead of ending the sale of petrol and diesel cars in 2030.

The Sixth Carbon Budget (December 2020)

5.4.9 This report provides the Climate Change Committee's recommendations for the UK's Sixth Carbon Budget which will run from 2033 to 2037 and describes the path to net zero.

5.4.10 The 'Balanced Net Zero Pathway' is the basis of the advice on the Sixth Carbon Budget and was built on multiple lines of evidence, taking into account what is feasible over time and what is necessary to get on track to net zero by 2050.

5.4.11 The recommended pathway requires a 78% reduction in UK territorial emissions between 1990 and 2035. In effect, it brings forward the UK's previous 80% target by nearly 15 years. The pathway meets the Paris Agreement stipulation of 'highest possible ambition'. It is challenging but also hugely advantageous, creating new industrial opportunities and ensuring wider gains for the nation's health and for nature. The scale of ambition is clear, but requires immediate action if the ambition is to be achieved.

5.4.12 The report is clear that the utmost focus is required from Government over the next eight years (up to 2030). If policy is not scaled up across every sector; if business is not encouraged to invest; if the people of the UK are not engaged in this challenge - the UK will not deliver net zero by 2050. The 2020s must be the decisive decade of progress and action.

5.4.13 This report also highlights the need for EV charging points to be scaled up rapidly during the 2020s. This comprises of a mix of private chargers in people's homes and workspaces, as well as strategic road network charging points for longer distance driving.

Ten Point Plan for a Green Industrial Revolution (2020)

5.4.14 The plan projected to help the UK reach its net zero emissions target by 2050, with a total of £12 billion set aside to create and support up to 250,000 green jobs across the country.

5.4.15 The plan focuses on increasing ambition in the following areas:

- advancing offshore wind
- driving the growth of low carbon hydrogen
- delivering new and advanced nuclear power
- accelerating the shift to zero emission vehicles
- green public transport, cycling and walking
- 'jet zero' and green ships
- greener buildings
- investing in carbon capture, usage and storage
- protecting our natural environment
- green finance and innovation

Net Zero Strategy: Build Back Greener (2021)

5.4.16 The UK's new Net Zero Strategy sets out, for the first time, how the UK Government plans to deliver its emissions targets of Net Zero in 2050 and a 78% reduction from 1990 to 2035 (-63% relative to 2019). It puts forward an achievable and affordable vision that will bring net benefits to the UK.

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

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

Building a Comprehensive and Competitive Electric Vehicle Charging Sector That Works for All Drivers (July 2021)

5.4.19 The UK has committed to reducing greenhouse gas emissions by 28% by 2035 and moving to Net Zero by 2050. Transport, in particular cars, is the largest source of emissions (accounting for 27%). Transitioning from petrol and diesel cars to electric vehicles (EVs) is therefore key to reducing emissions and meeting Net Zero. Reflecting this, the UK Government has committed to end the sale of new petrol and diesel cars/vans from 2030.

5.4.20 For this to happen, however, it is essential that there is a comprehensive and competitive EV charging network in place, one that people can trust and they are confident using – much like filling up with petrol or diesel. If this is not the case, and the charging network is perceived as inadequate, or as not offering a fair deal to people, that will be a major barrier to EV take-up.

5.4.21 The scale of the shift to EVs – requiring the development of an entirely new network – should not be underestimated. While it is difficult to know precisely how much charging will be needed, forecasts suggest that at least 280,000 to 480,000 public charge points will be needed by 2030 – more than 10 times the current number (around 34,000).

5.4.22 There will also need to be a suitable mix of different types of charging spread across the UK. While many people will regularly charge at home or work (if they can), a sufficient range of public charging is important to encouraging EV-take up. Rapid charging on longer journeys (such as on motorways and in remote areas) and on-street charging at the kerbside (for those without a driveway or garage) will be particularly important.

5.4.23 The Report found greater challenges in rolling-out charging along motorways. Being able to recharge as quickly as possible on longer journeys (en-route charging) is crucial to persuade drivers to switch to EVs as it will alleviate concerns about 'range anxiety' (the fear of running out of charge). But on motorways there has been very limited competition to date. Customer satisfaction has been very low, driven by concerns about poor reliability and limited charge points.

Environment Act 2021 (November 2021)

5.4.24 Almost two years after the Environment Bill had its first reading, it has been passed into law becoming the Environment Act 2021.

5.4.25 The Act implements Government's ambitions for 'improving the natural environment', which were previously set out in publications including the 25 Year Environment Plan (2018), with the UK becoming the first country to set a legal target to halt species decline by 2030.

5.4.26 Through the Act, the Government will clean up the country's air, restore natural habitats, increase biodiversity, reduce waste and make better use of our resources. This includes the delivery of biodiversity net gain to ensure developments deliver at least 10% increase in biodiversity.

Climate Change Committee Progress Report to Parliament (2022)

5.4.27 The 2022 Progress Report highlights that the UK now has a solid Net Zero strategy in place, but important policy gaps remain, and tangible progress is lagging. There must now be greater emphasis on delivery.

Taking Charge: The Electric Vehicle Infrastructure Strategy (March 2022)

5.4.28 The UK EV Charging Infrastructure Strategy was commissioned due to concerns around the growing disparity between the number of EV vehicles on the road, and the number of EV charging points across the country. Politicians and policy-makers in Westminster started to fear that EV uptake in the UK would become constrained by the lagging rollout of supporting infrastructure. The pace of rollout is too slow – even the recent surge in charge point deployment is not at a pace consistent with what is needed for a wholly zero emission new car fleet in 2035.

5.4.29 The EV Infrastructure Strategy sets out the vision for 2030, stating that the UK government will remove charging infrastructure as both a perceived, and a real, barrier to the adoption of electric vehicles (EVs). EV charging should be cheaper and more convenient than refuelling at a petrol station. **By 2030, the UK government expect there to be around 300,000 public charge points as a minimum in the UK**, but there could potentially be more than double that number. **This represents approximately a 750% increase in EV charging points required to support the uptake of EV by 2030.**

5.4.30 The Strategy sets out that the UK Government will accelerate the rollout of high-powered chargers on the strategic road network through the £950m Rapid Charging Fund. This will unlock

current barriers to deployment at some of these locations. Confidence in the ability to undertake longer journeys is fundamental to EV adoption. The Strategy will ensure that every motorway service area has at least six rapid chargers by the end of 2023, with some having more than 12. It is aimed to have over 6,000 high powered chargers along our strategic roads by 2035.

5.4.31 The UK EV Infrastructure Strategy states that the UK Government will consider what further role Planning Practice Guidance (PPG) can have in ensuring the delivery of EV infrastructure is appropriately supported by the planning system.

2021 UK Greenhouse Gas Emissions Provisional Figures (March 2022)

5.4.32 Carbon dioxide (CO_2) emissions in the UK are provisionally estimated to have increased by 6.3% in 2021 from 2020, to 341.5 million tonnes (Mt), and total greenhouse gas emissions by 4.7% to 424.5 million tonnes carbon dioxide equivalent (MtCO2e). Compared to 2019, the most recent pre-pandemic year, 2021 CO_2 emissions are down 5.0% and total greenhouse gas emissions are down 5.2%. Total greenhouse gas emissions were 47.3% lower than they were in 1990[8].

5.4.33 This increase in 2021 is primarily due to the increase in the use of road transport as nationwide lockdowns were eased, along with increases in emissions from power stations and the residential sector. CO_2 emissions from transport rose 10.0% in 2021, accounting for almost half of the overall increase from 2020.

5.4.34 The transportation sector had been the second-largest source of greenhouse gas (GHG) emissions in the UK for the majority of the past three decades, behind only the energy supply sector. **In 2021 transport accounted for 31.5% of all territorial carbon dioxide emissions**, compared to 30.4% in 2020 and 33.7% in 2019 (pre-pandemic). The large majority of emissions from the transport sector are from road transport.

DfT Electric Vehicle Charging Device Statistics: October 2022 (October 2022)

5.4.35 This release presents statistics on the number of publicly available electric vehicle charging devices in the UK, broken down by Local Authority for July to September 2022. These statistics are considered in the context of the UK Electric Vehicle Infrastructure Strategy (2022), which aims to provide 300,000 publicly available chargers by 2030.

5.4.36 Of the 34,637 public charging devices installed, only 6.3% were 'en-route' – i.e. charging devices located for charging to continue a journey, located in motorway service areas, service stations,

[8] https://www.gov.uk/government/statistics/provisional-uk-greenhouse-gas-emissions-national-statistics-2021

electric forecourts and ferry terminals. Additionally Rapid or Ultra-Rapid devices are often installed in hotels, restaurants and attractions. Given the importance of en-route charging to facilitate long distance EV travel, and to reduce so-called 'range anxiety' for EV users, there is a need to dramatically increase 'en-route' EV charging facilities.

5.4.37 Only 34,637 publicly available chargers have been installed in the UK – a shortfall of 265,363. **In order to meet the target of 300,000, the UK must increase its current charging provision by eightfold, in 7 years.**

5.4.38 As of 1 October 2022, there were 34,637 public electric vehicle charging devices installed in the UK, within which:

Charging Speed:

- 6,395 were rated "rapid" devices or above
- 19,746 were rated "fast" chargers

5.4.39 The DfT October 2022 Report sets out the provision of EV chargers based on speed of charging, highlighting the current under-provision of ultra-rapid (100kW+) chargers. Figure 5.1 presents figures on public charging devices by charging speed.

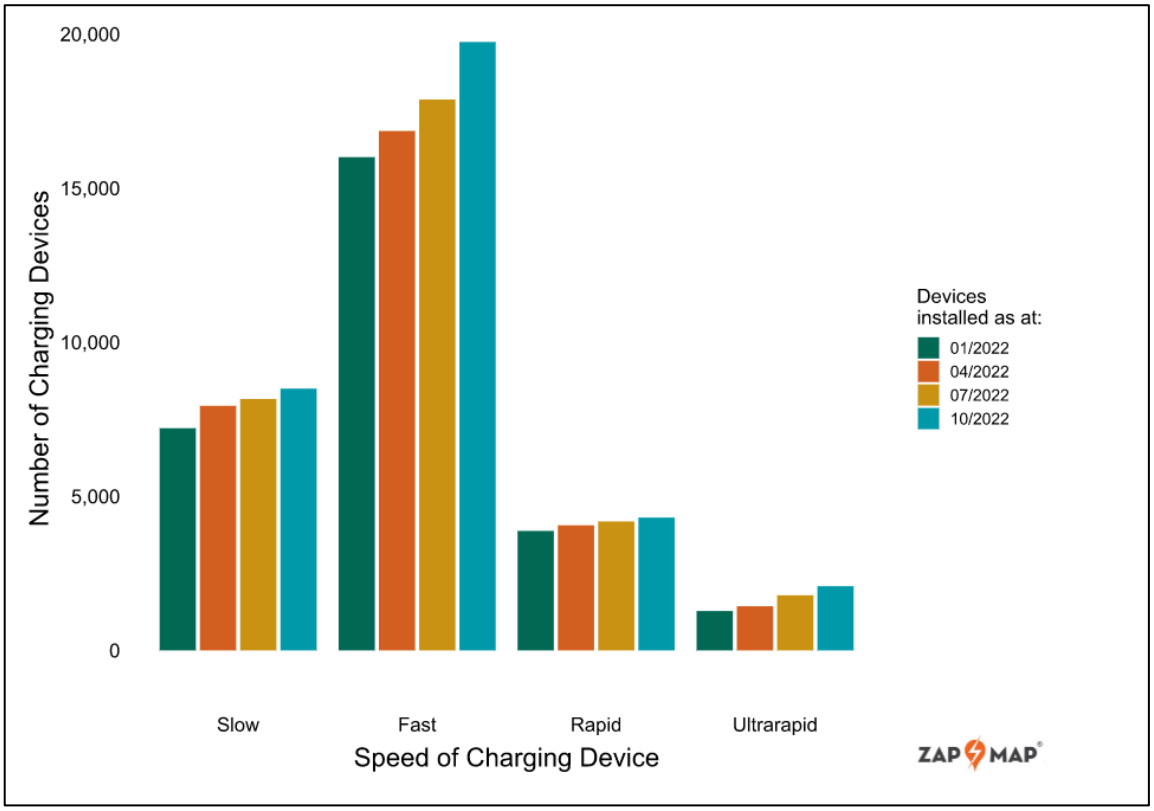

Figure 5.1. Public Charging Devices by Charging Speed October 2022 [Source: Department for Transport]

5.4.40 Figure 5.1 compares the relative growth in charging devices seen across all speed categories throughout 2022. Proportionately, the largest increase in installations was within the ultra-rapid device category, which increased by 16% in the last quarter (albeit from the lower base than other categories), accounting for 295 charging devices. Ultra-rapid charging devices are still the smallest overall category with 2,084 devices.

Mission Zero: Independent Review of Net Zero (Rt Hon Chris Skidmore MP) (January 2023)

5.4.41 The UK is failing on its net zero plans unless it takes a 'new approach' to green targets, a review has warned.

5.4.42 On 13th January 2023, Tory MP Rt Hon Chris Skidmore published the review, 'Mission Zero: Independent Review of Net Zero'.

5.4.43 The UK's leadership on tackling climate change has delivered real change at home and led to a global transformation – but more should be done to reap the economic benefits that presents, Chris Skidmore said.

5.4.44 Mission Zero, his Net Zero Review, makes 129 recommendations covering areas including the greater role that business can be supported to play, making better use of infrastructure and delivering more energy-efficient homes. Every one is designed to maximise economic investment, opportunities and jobs – all while working towards achieving legally binding targets to reach net zero carbon emissions by 2050.

5.4.45 Chris Skidmore provides comments on the UK's challenge of EV charging infrastructure rollout, stating: "*For those dependent on public chargers, accessing them in some areas can be particularly difficult; some regions are 'blackspots', meaning people have to spend more money driving longer distances in order to charge*".

5.4.46 Government has published an Electric Vehicle Infrastructure Strategy (EVIS), setting out its expectation for a minimum of 300,000 public chargers to be available by 2030. The Climate Change Committee (CCC) sets out that the government intends to rely primarily on competition to close the price gap between home and public charging; however, Chris Skidmore highlights that there is little evidence to date that this is happening. Chris Skidmore states: "*Government should deliver the ambition set out in the EVIS and this should not be left only to private companies to deliver. Government should build on the Local Electric Vehicle Infrastructure pilot and enhance cooperation with local authorities to enable them to take a leading role in vehicle charging roll-out. A 'broadband style' approach should be taken to ensure that chargers are*

spread out fairly across the country. We need a complete chargepoint grid and full access to this across the UK".

6.0 Green Belt Assessment

6.1 Introduction

6.1.1 This section of the Statement provides an assessment of the Green Belt, and the contribution the application site makes to the upholding the main purposes of the Green Belt as set out in the NPPF.

6.1.2 The application site is located within the Green Belt. As can be seen in Figure 6.1 below, the Green Belt covers a vast amount of land surrounding the M1 motorway.

Figure 6.1. The Site's Position Within the Green Belt

6.2 Green Belt Review

6.2.1 Barnsley Metropolitan Council conducted a Green Belt Review in 2014 as part of the evidence gathering exercise for the development of the Barnsley Local Plan 2019.

6.2.2 The application site falls within the area assessed in the Darton and Mapplewell Review – labelled as parcel 'MPW4'. Parcel MPW4 comprises a large area of approximately 250ha, with the application site comprising just 0.1ha. Therefore, the assessment undertaken by Barnsley Metropolitan Council in 2014 does not seem proportionate or representative of the application site. The Applicant has provided an assessment of the development site against the 5 purposes of the Green Belt as listed in Paragraph 138 of the NPPF (2021). This assessment is set out below in Table 6.1.

Table 6.1. Assessment of the Development Site Against the Five Purposes of the Green Belt

Purpose of the Green Belt	Assessment
1. To check the unrestricted sprawl of large built-up areas;	The site is bound to the east by the M1 motorway and to the west by the A637 – both highways form clearly defined physical boundaries in the Green Belt. The site is not positioned on a settlement edge – located approximately 1km north of Kexbrough. There is no policy support for edge of settlement development and thus, land between the proposal site and the settlement boundary is protected by planning policy. No boundaries of nearby settlements will extend into the Green Belt as a result of the proposals. Therefore, the development has no potential to lead to unrestricted sprawl. Accordingly, Purpose 1 of the Green Belt is not compromised.
2. To prevent neighbouring towns merging into one another;	As established, this site is an existing car park area serving The Old Post Office. The closest settlements to the site are Kexbrough, Darton, Mapplewell and Woolley Grange. The development would not lead to the outward expansion of either settlement into the Green Belt, and thus would not lead to the mergence of neighbouring towns. Accordingly, Purpose 2 of the Green Belt is not compromised.
3. To assist in safeguarding the countryside from encroachment;	The site has consent as a restaurant and carpark. The M1 and A637 form clearly defined physical boundaries to the east and west, respectively. The site is effectively 'sandwiched' between these two highways, occupying a small parcel of developed land. The car park area is set down from

	Huddersfield Road, which together with existing and proposed landscaping would provide visual screening. As a modest development to provide EV charging points within an existing car parking area, the development would not result in the encroachment of the countryside. Accordingly, Purpose 3 of the Green Belt is not compromised.
4. To preserve the setting and special character of historic towns; and	There are no designated heritage assets, such as Conservation Areas or Listed Buildings, within close proximity to the site which could be impacted in regard to purpose 4. The modest development would not impact on the special character of historic towns in the area. Accordingly, Purpose 4 of the Green Belt is not compromised.
5. To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.	The purpose of the development is to improve the local transport network. The location of the development was considered and chosen for its proximity to the M1 and A637 to serve users of these highway networks. Due to the extent of the Green Belt coverage along the M1 corridor, there is no other suitable land in the surrounding area which serves the purpose of the development and as such the development is located in the most suitable location. The opportunity has also been taken to utilise a parcel of land that is already being used for car parking. Accordingly, Purpose 5 of the Green Belt is not compromised.

6.2.3 In conclusion, the site is not positioned on a settlement edge and development would not lead to the merging of neighbouring settlements. Given the site is within the confines of an existing car park, set down from the highway and with existing and proposed soft landscaping, it is not considered that the addition of 12no. EV chargers would result in a perceived encroachment into the countryside or a reduction in Green Belt openness. The Soft Landscaping Plan which accompanies this planning application is proposing additional soft landscaping to the north and west of the proposed EV charging development, to screen views from Huddersfield Road and mitigate impact on the Green Belt.

6.2.4 The site is positioned between two major highway roads – the M1 and the A637. The fundamental aim of Green Belt policy is to retain a sense of openness. It is considered that the contribution of the development site to upholding a sense of Green Belt openness is very limited at this location, given the site's existing developed nature and position between major highways.

6.3 Green Belt Planning Policy Context & Assessment

Protecting the Openness of the Green Belt

6.3.1 Paragraph 137 of the NPPF states that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence. Whilst openness at its simplest is an absence of built development, preserving Green Belt openness is not in itself a preclusion on new development within the Green Belt, rather a matter of planning judgement.

6.3.2 There is, however, no definition as to what constitutes 'openness'. Existing planning case law examines this issue. In the case of Goodman Logistics Developments (UK) Ltd v Secretary of State for Communities and Local Government & Anor (27th April 2017), the decision confirmed that both the spatial and visual impact or perception of development are material considerations when assessing openness.

6.3.3 Despite there being impact upon the site's openness due to the introduction of structures that previously was not there, in spatial terms, the case of Goodman Logistics Developments (UK) Ltd v Secretary of State for Communities and Local Government & Anor [2017] EWHC 947 (Goodman Logistics Case) concluded that it is relevant to take into account visual perception as a factor which may reduce the spatial harm from the effect of a development on the openness of the Green Belt, i.e. if the visibility from outside the site is limited, it may be accepted as having no or a limited impact on the openness of the Green Belt.

6.3.4 The Planning Practice Guidance states that '*openness is capable of having both spatial and visual aspects – in other words, the visual impact of the proposal may be relevant, as could its volume'*. Regarding visual impact, the proposed development would be set within an existing car park, set within the context of an operational restaurant and the M1 motorway and A637. The existing built form on and around the site is considered to reduce the sense of openness at the site. The presence of the busy M1 severely reduces a sense of Green Belt openness in the wider landscape. As set out in this Statement, the proposals will be designed to sit discreetly within the setting – with low-lying minor development and landscape mitigatory planting. An initial constraints and opportunities analysis of the site indicates that there is potential to include soft landscaping design to the north and west of the site, as shown in the submitted Soft Landscaping Plan.

6.3.5 It is considered that the proposals in their entirety, including mitigatory planting, retain what level of openness there is at the site pre-development.

Inappropriate Development and Paragraph 150 of the NPPF (2021)

6.3.6 Policy GB1 of the Local Plan states that within the Green Belt there is a general presumption against inappropriate development. Development proposals within the Green Belt will be assessed in accordance with government guidance contained in the NPPF and NPPG.

6.3.7 Paragraph 147 of the NPPF establishes that 'inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances'. Paragraph 150 lists 'local transport infrastructure which can demonstrate a requirement for a Green Belt location' as a form of development which would not be inappropriate in the Green Belt provided the proposal preserves its openness and does not conflict with the purposes of the land within it.

6.3.8 The Green Belt covers a vast amount of land surrounding the M1 motorway through South Yorkshire. Figure 6.1 (above) shows the extent of Green Belt coverage surrounding the M1 - this presents unique challenges for the development of supporting highway infrastructure adjacent to the M1. This Statement has also demonstrated how there is a demand for ultra-rapid EV charging infrastructure along this stretch of the M1 – which is covered by the Green Belt designation.

6.3.9 Furthermore, the development of EV charging within the existing car park at The Old Post Office removes the need to develop greenfield land and delivers destination EV charging, as well as 'en-route' provision [i.e. users of the M1]. Furthermore, there is a requirement for Green Belt development in this case due to the location of the point of connection within the Green Belt. Relaying back to Figure 3.2, there is no land within 600m of the point of connection that falls outside of the Green Belt.

6.3.10 Table 6.1 (above) provides an assessment of the Green Belt in regard to protecting its intended purposes and retaining a sense of openness. It is considered that the site provides limited contribution to upholding the purposes of the Green Belt. The proposed development will be designed to sit discreetly within an existing car park. The proposals are low-lying and are anticipated to be screened by existing and proposed boundary hedgerow and tree planting.

6.3.11 The submitted Soft Landscaping Plan, developed with input from the project Ecologist to provide a +10% gain in biodiversity, outlines where additional soft landscaping will be planted to screen the proposals and protect the sense of openness, principally from Huddersfield Road. The main perception of site openness comes from users of Huddersfield Road to the west.

6.3.12 Taking into account the provisions of Paragraph 150, it is considered that the proposals represent local transport infrastructure – providing publicly available universal EV charging points, for which a Green Belt location in this case is wholly justified for the following reasons:

1. **A Demand for Further EV Charging Facilities Near to M1 [En-Route Charging]**

   There is a lack of existing ultra-rapid(100kw+) EV charging infrastructure along the M1 in this region. The site is situated directly adjacent to Junction 38 of the M1 – a major UK highway carrying traffic north and south between West Yorkshire, South Yorkshire, the Midlands and beyond that, London. A review of ZapMap indicates that there is a lack of ultra-rapid (100kW+) electric vehicle charging points along this stretch of the M1. ZapMap indicates that there are existing high-powered EV chargers at Moto Services at Woodley Edge, but a general under provision of high-powered EV chargers along the M1 motorway.

   Given the strategic importance of this motorway carrying northern and southern bound traffic through Yorkshire and the East Midlands, it is forecast that demand along this stretch of the M1 would be high and the site is well placed for the provision of additional EV charging infrastructure to meet this demand.

   In summary, there is a lack of ultra-rapid EV charging facilities along this stretch of the M1. In line with the ambitions set out in the UK Electric Vehicle Infrastructure Strategy (2022), a tenfold expansion in chargepoints by 2030 is required – principally close to the UK's major highways. The proposals will act to support the decarbonisation of the M1 and surrounding highway network within Barnsley and South Yorkshire.

2. **Locating EV Chargers Adjacent to Supporting Uses to Deliver Additional Benefit [Destination Charging]**

   The site is located within The Old Post Office car park. The development would enable EV owners to charge their vehicle whilst they visit the restaurant / public house – which includes food and drink provision. It is preferable to co-locate EV charging points adjacent to such uses in order to a) preserve greenfield sites and b) allow users of the charging points to provide custom to surrounding business uses, contributing to their viability.

3. **Proximity to a Point of Connection with Grid Capacity**

A viable point of connection has been identified 50m to the south of the application site (Figure 3.1). The Old Post Office is the closest site offering an existing car park suitable to accommodate the development.

6.3.13 The requirement for EV charging infrastructure at this location is clear – given the site's proximity to the strategic highway network, lack of sufficient existing EV charging points in the wider area, proximity to supporting uses such as the retail and amenities offered at The Old Post Office and proximity to the identified point of connection with grid capacity to support such an installation.

6.3.14 It is the Applicant's assertion that electric vehicle charging infrastructure, in this case, falls under the provisions of paragraph 150 of the NPPF and is thus considered as not 'inappropriate development' for which very special circumstances are needed in decision making. As set out, the openness of the Green Belt and the five purposes have been protected through sensitive siting and landscape mitigation proposals.

6.4 Very Special Circumstances

6.4.1 The test of very special circumstances is a planning balancing exercise (which is a matter of planning judgement) to establish whether the harm to the Green Belt and any other harm is clearly outweighed by the scheme benefits.

6.4.2 Whilst it has been established that the proposals do not constitute 'inappropriate development' and the effect on the openness of the Green Belt at this specific site would be minimal – mitigated through existing and proposed landscape planting and sensitive design, there nevertheless exists 'very special circumstances' which in our view are addressed and demonstrated below.

<u>Environmental Benefits</u>

1. The proposals would provide essential EV charging infrastructure along a strategically important motorway corridor, in line with ambitions set by the UK Government in the Electric Vehicle Infrastructure Strategy (March 2022). **By 2030, the UK government aim to provide around 300,000 public charge points** as a minimum in the UK, but there could potentially be more than double that number as uptake in EVs rises exponentially as more people make the switch to EVs as rollout of charge points increases. This represents approximately a 750% increase in EV charging points required to support the uptake of EV by 2030. The proposals would contribute to this overall figure in an

area with poor existing coverage, whilst encouraging more sustainable modes of transport.

2. The proposals will be supported by an Ecological Impact Assessment and Biodiversity Net Gain Calculation, showing that the proposals will deliver a net gain of at least +10% as required by the Environment Act 2021.

Public Benefits

3. The proposals will provide essential ultra-rapid EV charging infrastructure in a District which currently has an under provision of ultra-rapid publicly accessible EV chargers. There is high travel demand through South Yorkshire, both outwards and inwards, with high numbers of residents commuting in and out of the District for employment, and high numbers of people travelling into the District for tourism and leisure. In order to sustainably support these travel movements, more publicly accessible ultra-rapid EV charging capacity is clearly required.

4. The EV chargers are universal, meaning any model of EV can utilise the charging infrastructure proposed. This expends the public benefit of the proposals beyond just Tesla users.

Economic Benefits

5. The proposals are situated within an existing car park serving The Old Post Office. The proposals would operate in a mutually beneficial way, as users of the restaurant would have access to the superchargers, but also the superchargers will act to draw in more footfall, contributing to the business's long term viability.

Lack of Alternatives

6. The applicant has identified a point of connection proximate to the M1 Junction 38 with sufficient capacity to support a connection for 12no. EV chargers. Given the increase in EV charging infrastructure required by the UK Electric Vehicle Infrastructure Strategy (2022), there is strong planning merit to developing this site for EV chargepoints to support en-route charging for users of the M1. A 600m site search (Figure 3.2) shows that there are no non-Green Belt sites or other developed sites within 600m of the PoC

which would be preferable for development at this PoC. This forms a very special circumstance and justification for a Green Belt location.

6.4.3 Overall, it is considered that the proposal would fall under categories outlined in paragraphs 150 and 151 of the NPPF, supported by very special circumstances, as it would meet policy requirements in respect of local transport without impeding the openness of the Green Belt.

7.0 Assessment of Environmental Impacts

7.1 Introduction

7.1.1 This chapter discusses the potential environmental impacts of the proposed development. They are set out and have been considered in the context and nature of the development; the characteristics of the area in which it is located; and in the context of local and national policy. The results of the technical assessments are also considered.

7.2 Landscape

7.2.1 As noted above, the planting strategy as set out above was devised in correspondence with the project landscape architect.

7.2.2 The site is an existing car park. In the context of this, the Tesla supercharger units would not, by virtue of being a modest addition, appear incongruous within this setting. It is considered that the addition of the superchargers and the supporting infrastructure does not compromise the landscape aesthetic of this car park.

7.2.3 A Soft Landscape Plan has been prepared for this planning application. The Plan integrates the existing green infrastructure network with the proposed new planting whilst complementing the existing trees, hedgerows and soft landscaping around the site. Wooden fencing would screen the substation.

7.2.4 As well as limiting the visual impact of the substation by screening the development, the planting strategy also aims to increase biodiversity while also respecting and enhancing the heritage and character of the site location. It is proposed to plant a 36m native species hedge to the south-east of the proposed chargers, to create easy-to-maintain car park edge, preventing encroachment of existing vegetation to the South and closely matching existing semi-native hedge around car parking spaces across the site. In addition, it is proposed to plant 4no. Emerald Queen Norway maple trees on an existing verge within the car park. A 21m beech hedge is proposed is around the DNO substation and equipment cabinets. Planting to the north and west of the development site would act to visually screen the development from Huddersfield Road and introduce further soft landscaping across the car park.

7.3 Ecology

7.3.1 An Ecological Impact Assessment, prepared by Enzygo Ltd, is submitted in support of this planning application.

7.3.2 The submitted Ecological Impact Assessment and Biodiversity Net Gain Calculation show that the proposals will deliver a net gain of 2632% habitat units and 367% hedgerow units, far in excess of the statutory 10% as required by the Environment Act 2021.

7.3.3 The landscape planting scheme shall incorporate a range of native species and species which are known to be of value to wildlife and which are suitable to the site location and conditions. Planting should be focussed on complementing and contributing to the existing value of boundary hedgerows and woodland, providing enhanced habitat connectivity and wildlife corridor function at the site.

7.3.4 No pre-determination protected species surveys or specific need for consultation with statutory consultees has been identified prior to granting of planning permissions.

7.3.5 The proposals are of a type, scale and distance that any direct or indirect construction or operational impacts on identified ecological features are reasonably discounted. Specifically, no impacts of the proposals have been identified on Denby Grange Colliery Ponds SAC to the north-west, with no potential direct or indirect impacts identified on the qualifying Great Crested Newt population (e.g. hydrological connectivity between the site and SAC).

7.3.6 The EcIA has demonstrated that, if the outlined mitigation measures are implemented in full then no significant residual impact could be expected and the proposed application will result in 'no net loss in biodiversity' whilst providing opportunities for 'biodiversity net gain' in accordance with NPPF and Local Planning Policy.

7.4 Arboriculture

7.4.1 An Arboricultural Survey Report and Arboricultural Impact Assessment and Method Statement, prepared by Enzygo Ltd, are submitted in support of this planning application.

7.4.2 The supporting Arboricultural Report sets out an Arboricultural Method Statement, which specifies methodologies to ensure any retained trees are adequately protected during construction.

7.4.3 The provision of a 1-1.5m wide working area around the southern edge of the development will require the cutting back of two groups along the edge of the car park, with removal of a small number of young individual trees which is expected to have a low impact on the character of the site.

7.5 Noise

7.5.1 A Noise Impact Assessment, prepared by Enzygo Ltd, is submitted in support of this application.

7.5.2 Sound levels generated by the Tesla infrastructure have been predicted using the proprietary noise modelling software CadnaA. The assessment is based on the results of a series of noise predictions undertaken in accordance with the calculation methodology contained in ISO9613 'Acoustics – Attenuation of sound during propagation outdoors – Part 2: General method of calculation'. The noise impact at the nearest noise-sensitive receptors has been established against absolute noise limits derived from guidance detailed in BS8233:2014.

7.5.3 Table 7.1 summarises the results of the assessment. Table 7.1 demonstrates that the predicted sound rating levels fall well below the derived noise limits.

AL01 Sheep Lane Head	Predicted Rating Level dB $L_{Aeq,T}$	Derived Noise Limits, dB	Difference, dB
Daytime (07:00 – 23:00 hrs)	30	50	-20
Night-time (23:00 – 07:00 hrs)	32	35	-3

Table 7.1. Assessment Against Derived Noise Limits

7.5.4 The assessment demonstrates that noise from the Tesla facility, when operating at 100% of its capacity, would fall well below the derived noise limits. Furthermore, the predicted levels are sufficiently low as to ensure no cumulative rise in noise levels which would exceed the guideline values from BS8233 would occur.

7.5.5 Given the above, it is concluded that noise from the proposed development would not result in adverse noise impacts on any of the receptors in the vicinity of the development. As such, there are no reasons, on noise grounds, why planning consent for the charging stations cannot be granted.

7.6 Highways

7.6.1 The car park serving The Old Post Office is consented and deemed appropriate to host 12 EV charging stands. It is not considered that the addition of 12no. Tesla superchargers in the existing car park would create an adverse traffic impact.

7.6.2 The proposals seek to improve the sustainability of the highways, in line with national objectives. The proposals would have a positive impact on the highways, facilitating the uptake of electric vehicles.

8.0 Conclusion

8.1.1 Enzygo Ltd has been commissioned by Tesla Motors Ltd to prepare a planning application for the development of 12no. electrical vehicle supercharging units and associated electrical infrastructure and landscaping in the carpark of The Old Post Office, Huddersfield Road, Haigh, Barnsley, S75 4DE.

8.1.2 This combined Planning and Design and Access Statement has provided details of the application site and details of the development. The report also considers the planning policy guidance in relation to the development, the site and its surroundings. The document also discusses the environmental assessments in relation to the site.

8.1.3 The proposal would make a contribution towards the reduction of carbon levels and provide a facility for the growing number of electric vehicles, an objective which is supported by the Barnsley Local Plan and the NPPF.

8.1.4 It is concluded that the proposals would form 'local transport infrastructure' as per paragraph 150 of the NPPF and thus would not constitute 'inappropriate development'. Due to the site's context between the M1 and A637, the natural topography and the existing and proposed soft landscaping, the proposals would not detract from the appearance of the locality or cause substantial harm to the Green Belt. The proposal would not adversely affect the amenities of neighbouring properties.

8.1.5 The Green Belt section discusses the development within its Green Belt location and identifies that the development would have a negligible impact against the five purposes of the Green Belt. Considering this and the fact that the development is deemed to not constitute 'inappropriate development' within the Green Belt, it is concluded that the proposals are appropriate and sufficient justification for their Green Belt location has been provided.

8.1.6 The proposed Planting Plan and ecological enhancement ensures that the development is in keeping with the nature and context of the site, whilst offering significant biodiversity net gain.

8.1.7 Overall, the proposal would contribute towards the reduction of carbon and provide a facility for the growing number of electric vehicles, an objective which is supported under the NPPF and other UK Government policies.

8.1.8 It is therefore concluded that the proposal would not detract from the appearance of the locality or cause substantial harm to the Green Belt, and that planning permission should be granted without delay.

Appendix A – Site Location Plan

Sks

38

M1

Low Swithen

70m

PH

HUDDERSFIELD ROAD

Path

Co Const & CP Bdy

Path

FB

M1

Sheep Lane Head

Track

76m

Mast

Track

0 50 100 150 200

Scale 1:2500

Key

Application Boundary

enzygo
environmental consultants

Samuel House, 5 Fox Valley Way, Stocksbridge, Sheffield, S36 2AA

CLIENT:
Tesla Motors Ltd

SCALE:
1:2,500@A3

PROJECT REF:
CRM.3030.014

DRAWN:
KR

CHECKED:
TB

DATE:
May 2023

PROJECT:
The Post Office,
600 Huddersfield Rd,
Haigh, Barnsley S75 4DE, UK

TITLE:
Site Location Plan

DRAWING NO:
CRM.3030.014.PL.D.001

Enzygo specialise in a wide range of technical services:

Property and Sites
Waste and Mineral Planning
Flooding, Drainage and Hydrology
Landscape Architecture
Arboriculture
Permitting and Regulation
Waste Technologies and Renewables
Waste Contract Procurement
Noise and Vibration
Ecology Services
Contaminated Land and Geotechnical
Traffic and Transportation
Planning Services

BRISTOL
The Byre
Woodend Lane
Cromhall
Gloucestershire
GL12 8AA
Tel: 01454 269 237

SHEFFIELD
Samuel House
5 Fox Valley Way
Stocksbridge
Sheffield S36 2AA
Tel: 0114 321 5151

MANCHESTER
Ducie House
Ducie Street
Manchester
M1 2JW
Tel: 0161 413 6444

CARDIFF
Regus House
Malthouse Avenue
Cardiff Gate Buisness Park
CF23 8RU
Tel: 02920 023 700

Please visit our website for more information.

enzygo.com