



Build Studios, London, SE1 7FR

Knowsley Metropolitan Borough Council
Municipal Buildings
20 Archway Rd
Huyton
Liverpool
L36 9UX

15th November 2024

Dear Sir/Madam

Re: Application by PoGo Charging for Planning Permission for the '*Provision of Electric Vehicle Charging Bays and Associated Works*' at Halewood Shopping Centre Leather's Lane, Liverpool L26 OAD.

We are instructed by PoGo Charging to submit a planning application in respect of the '*Provision of Electric Vehicle Charging Bays and Associated Works*' at Halewood Shopping Centre Leather's Lane, Liverpool L26 OAD.

This application has been submitted via the Planning Portal, Ref: PP-13565329. Accordingly, please find enclosed the following attached in support of the planning application:

1. Planning application forms and certificates duly completed;
2. Site Location Plan and Block Plan, Drawing Ref: P-03-A;
3. Existing Site Plan, Drawing Ref: P-01-A;
4. Proposed Site Plan, Drawing Ref: P-02-A;
5. Charger Plan, Drawing Ref: 11-01-E;
6. Power Unit Plan, Drawing Ref: 12-01-C;
7. Signage and Bollards Plan, Drawing Ref: 13-05-A;
8. Floodlight Plan, Drawing Ref: 13-01-C;
9. Feeder Pillar Plan, Drawing Ref: 12-04-B;
10. Substation Plan, Drawing Ref: 14-10-X;

The planning application fee has been paid via the Planning Portal.

The application seeks the provision of ten new EVC bays and associated works within an existing car parking area at Halewood Shopping Centre, Leather's Lane, Liverpool L26 OAD.

It is considered that the submitted application is of significant merit as it will improve customer offer and experience on site to meet customer demand by enabling the provision of electric vehicle charging.

The facility will provide strategically located electric vehicle charging bays for EVs, reducing CO₂ emissions from road transport and reducing oil dependency as a transport fuel.

The National Planning Policy Framework identifies the need for planning positively for sustainable development and embracing the opportunity to support solutions which offer reductions in greenhouse gas emissions. This is further reiterated in the Development Plan and supporting documents, which support the provision of EV charging infrastructure and recognise the increasing need with associated environmental and air quality benefits.

This proposal provides the opportunity to meet targets for greenhouse gas reduction from road transport, improving air quality standards and increasing the use of alternative fuels by domestic drivers. It is hoped that with the provision of additional infrastructure on the highway network, the uptake of electric vehicles will continue to increase with the associated environmental benefits.

The Application Site

The application site is located within an existing shopping centre car park, which serves a number of retail stores.



Figure 1. Street view of the application site (Source: Google)

The site is located within the designated Halewood Town Centre and the Ravenscourt Action Area.

There are not any listed buildings in proximity which would be affected by the proposal, nor is the application site within a Conservation Area. The site is located within Flood Zone 1, so is at very low risk of flooding.

Site History

A review of the site's planning history has been undertaken using the Council's online planning application search.

The application site forms part of a wider development which was built out as part of a December 2006 permission (06/00926/FUL) for the "erection of two storey building to accommodate primary health care facilities, pharmacy, Knowsley one stop shop & partner services, learning resource centre, credit union, post office, meeting rooms/offices for hire, cafe, associated car park, access and widening of part of Roseheath Drive".

The Application Proposal

The application seeks to replace 17 no. standard car parking bays with 10 no. EVC bays.

The scheme will also see the introduction of associated works, including EVC upstands, a feeder pillar, power units, bollards, lighting, signage, and a substation.

The Applicant

PoGo Charge is a brand within the portfolio of SWARCO Smart Charging Ltd., part of SWARCO AG, and owned by the SWAROVSKI family. With over 13 years of dedicated experience in the electric vehicle (EV) sector, SWARCO Smart Charging has successfully installed more than 13,000 commercial charging points.

PoGo Charge is committed to becoming the leading provider in rapid and ultra-rapid charging solutions, aiming to establish new benchmarks in speed, reliability, and accessibility. As the PoGo Charge network continues to expand, the company strives to provide seamless and efficient EV charging experiences for communities across the region.

Background to Electric Vehicle Charging

There are around one billion cars on the world's roads. Of these around two to three million are pure battery electric and plug-in hybrid electric vehicles, according to the International Energy Agency (IEA). The IEA anticipates there may be three hundred to four hundred million electric vehicles (EVs) on the road out of approximately two billion vehicles by 2040.

The UK government's Electric Vehicle (EV) infrastructure strategy, outlined in the "Taking Charge" report from March 2022, aims to accelerate EV adoption. With the goal of ending sales of petrol and diesel cars by 2030, the report highlights the need for robust charging infrastructure. The government envisions a minimum of 300,000 public charge points by 2030, focusing on high-powered chargers on the strategic road network and local parking areas. The strategy emphasizes providing sufficient and accessible charge points, fair pricing, market-led rollout, smart integration, and

continuous innovation. It acknowledges challenges like slow infrastructure rollout and underscores the importance of local engagement.

The "Net Zero Strategy: Build Back Greener" (October 2021) supports the transition to zero emissions by 2050. It emphasizes reducing emissions through global actions, including the end of coal power and the retirement of petrol and diesel engines. The strategy promotes new investments in vehicle grants, EV infrastructure, and public charge points, allocating £280 million for greener vehicles. The "Electric Vehicle Revolution" announced in November 2021 details the vision for infrastructure rollout and the roles of public and private sectors.

The "State of Switch Report" by New Automotive (October 2021 and December 2022) projects a need for 230,000-280,000 public charge points by 2035. While EV sales have surged, the report emphasizes policy commitment to electrification and overcoming challenges, including the popularity of hybrids. By the end of 2022, the UK had 37,261 public chargers, a 31% increase since 2021, with hopes for continued growth in 2023.

The "Energy White Paper" from December 2020 expands on the green industrial revolution plan, setting out steps to cut emissions. The paper supports the end of petrol and diesel car sales by 2030 and outlines plans for a comprehensive EV network, with £1.3 billion funding to accelerate charge point rollout and future-proof grid capacity. The government recognizes the importance of a robust EV network at the highest level.

Planning Policy Framework

National Planning Policy Framework

The National Planning Policy Framework (NPPF) was updated in December 2023 and constitutes guidance for local planning authorities and decision-takers. It is a material consideration in the determination of planning applications (paragraph 2).

The purpose of the planning system is to contribute to the achievement of sustainable development (paragraph 7). Paragraph 8 confirms that there are three overarching objectives to sustainable development: economic, social, and environmental, which are interdependent and need to be pursued in mutually supportive ways.

- An economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right type 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 a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed, beautiful and safe places, with accessible services and open spaces that reflect

current and future needs and support communities' health, social and cultural wellbeing; and

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

At the heart of the NPPF is a presumption in favour of sustainable development (paragraph 10).

Local Planning Authorities should approach decisions on proposed development in a positive and creative way. They should use the full range of planning tools available and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision makers at every level should seek to approve applications for sustainable development where possible (paragraph 38).

Planning policies and decisions should help create the conditions which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and where there are opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future (paragraph 81).

Planning policies and decisions should recognise and address the specific locational requirements of different sectors (paragraph 85). Within the context of this application, of most relevance is paragraph 116, which states that development should be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.

The Development Plan

To the extent the Development Plan policies are material to an application for planning permission, a decision must be taken in accordance with the Development Plan unless there are material considerations that indicate otherwise (Section 70(2) of the Town and Country Planning Act 1990 and Section 38(6) of the Planning and Compulsory Purchase Act 2004).

The site falls within the jurisdiction of Knowsley Council. The Development Plan relevant to the application therefore comprises the Knowsley Local Plan Core Strategy (Adopted January 2016).

Policy CS2 (Development Principles) sets out a series of principles which new development in Knowsley will be expected to support. Principle 2 seeks to reduce carbon emissions and adapt to the effects of climate change by identifying and

applying measures offering effective mitigation and adaptation to likely environmental, social and economic impacts of climate change.

Planning Considerations

Principle of the development

There is a significant volume of supporting policy to the proposed application, both at the Local and National level. All of this policy seeks to presume in favour of electric vehicle charging and additional electric vehicle charging points in the council area. As such, the principle of the application is wholly supported by planning policy.

The development will provide environmental benefits through the provision of the EV charging bays which will support measures that mitigate and adapt to the impacts of climate change, including low carbon and renewable energy schemes.

Moreover, in England, permitted development rights support the installation of Electric Vehicle Charging (EVC) upstands in existing parking areas, provided certain criteria are met. While the proposal aligns with some of these criteria, others are not met. In addition, the installation of supporting infrastructure is not supported by permitted development rights in England, thus necessitating a full planning application for this scheme. Nevertheless, the existence of these rights underscores nationwide support for the development of Electric Vehicle Charging infrastructure.

Overall, the proposal will bring significant enhancement to an existing car parking area, ideally positioned to serve customers as well as local residents. The proposal will ensure that their needs and expectations are fully met.

Sustainability Credentials

The fundamental principle upon which the NPPF is based on is sustainable development. The document confirms that plans should protect and exploit opportunities for the use of sustainable transport modes for the movement of goods or people.

There is clear support from national policy for the use of non-fossil fuels and those with a low or zero carbon generation. As has been set out at length earlier within this Statement, there is also significant local and national policy support for an EV recharging hub at this location.

Electric vehicles can significantly reduce CO₂ emissions from the transport sector, especially if electricity is generated from renewable technologies. The benefits of electric vehicles are expanded upon elsewhere in the report, but they have the benefit of improving local air quality and providing significant health benefits, helping to address air pollution, whilst offering a comfortable, quiet ride for motorists.

Whilst the number of electric vehicles within the UK is relatively few at the current time, and a lack (or perceived lack) of infrastructure is seen as a major constraint, there are significant environmental benefits to electric vehicles in environmental terms.

Amenity

There are residential units located approximately 20 metres away from the scheme, on the opposite side of Roseheath Drive. However, the proposal is considered to have minimal amenity impacts. There will be no increase in noise, odour or light as a result of the development, nor will there be any adverse impact by way of loss of daylight/sunlight, loss of privacy or overlooking.

Additionally, the application site relates to an existing car park serving the retail units and the addition of EV charging bays is not considered to result in any additional impact on the amenity of nearby occupiers. Overall, the proposal has had due regard to amenity considerations and therefore complies with national guidance and the Local Plan.

Furthermore, the proposed development will not create any unacceptable light spill which will have an adverse effect on residential amenity nor wider amenity activity generally.

Flooding

The site falls within Flood Zone 1 and the development is proposed entirely on existing hardstanding, therefore it is not considered to contribute to flood risk in the area.

Parking and Transport

The proposal, in terms of the principle of use, is supported at all levels from a transport perspective with the introduction of low carbon vehicles meeting the objectives of climate change at a national and local level.

The provision of electric vehicle charging to the site is not considered to raise any issues as the existing operation of the site will unchanged, with no change in access/egress arrangements and a reduction from 17 no. parking bays to 10 no. EVC bays.

Conclusion

The proposal has been considered against the relevant planning policy and it is considered to be in accordance with the Development Plan. Material considerations, in the form of the National Planning Framework and general climate change policies weigh heavily in favour of the development, supporting the installation of technology for low carbon alternative fuel technologies.

English permitted development rights support the installation of Electric Vehicle Charging (EVC) upstands in existing parking areas, provided certain criteria are met. Although not all criteria are met with this scheme, the existence of these rights



underscores nationwide support for the development of Electric Vehicle Charging infrastructure.

Yours faithfully

Tom Leigh
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Encs.