



Build Studios, London, SE1 7FR

The Planning Inspectorate
2 The Square
Temple Quay
BRISTOL
BS1 6PN

21 July 2024

Dear Sir/Madam

**Application Under Section 62a of The Town and Country Planning Act 1990 (as Amended) for Full Planning Permission for the Installation of Vehicle Charging Points and Associated Infrastructure and Associated Works
MFG Redland Service Station, Hampton Road, Redland, Bristol, BS6 6JA**

I act on behalf of Motor Fuel Group (MFG) and I am instructed to submit an application directly to the Planning Inspectorate (PINS) as Bristol City Council, which is the administrative area within which the application site lies, has been placed into Special Measures under Section 62a of the Town and Country Planning Act 1990 (as amended) as it is considered that Bristol City Council as the local planning authority has not been adequately performing its function in determining applications.

This letter has been prepared by JMS Planning on behalf of the Applicant and is submitted in support of an application for full planning permission for "*Installation of vehicle charging points and associated electrical infrastructure and associated works*" at MFG Redland Service Station, Hampton Road, Redland, Bristol, BS6 6JA.

This planning application is submitted with the following supporting information:

1. Planning Application Forms, signed and dated;
2. Location Plan reference: 13664-LP1-144;
3. Block Plan reference: 13664-BP1-144;
4. Existing Site Layout reference: 13664-201-144;
5. Existing Site Elevations reference: 13664-PO3-144;
6. Proposed Site Layout reference: 13664-202-144 B;
7. LV Panel Elevations reference: 13664-204-144;
8. Proposed Site Elevations reference: 13664-205-144 B; and
9. Planning Statement and Appendices prepared by JMS Planning dated July 2024.

The relevant fee is considered to be £234.



The submission of this planning application follows a recent refusal dated 27 February 2024 of a planning permission, LPA Ref: 2023/00579/F for “*Installation of vehicle charging points with associated electrical infrastructure and works (sub-station to be installed by DNO)*”. This application was refused for one reason only, namely:

“1. There is insufficient justification to demonstrate that the additional EV charging space within the proposed development would not prejudice the implementation of an acceptable layout of the site in design, character and heritage terms and subsequently lead to the addition of incongruous plant equipment being added adjacent to the highway causing harm to street scape to the detriment of the established street scene and Whiteladies Road and Cotham and Redland conservation areas. The runs contrary to the conclusions of an Inspector under appeal decision APP/Z0116/W/23/3316534 as well as Sections 12 and 16 of the National Planning Policy Framework, Sections 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 and Local Plan Policies BCS21, BCS22 and DM31 as well as the Whiteladies Road Conservation Area Enhancement Statement (1993) and Cotham and Redland Conservation Area Character Appraisal (2011).”

The Applicant considers the above reason for refusal to be without merit and that Bristol City Council’s treatment of the application has been inadequate and flawed.

The previously submitted application specifically identified that the sub-station did not form part of the planning application, but rather that this was to be provided under permitted development rights via the relevant statutory undertaker. However, notwithstanding that the sub-station did not form part of the submitted planning application the Council refused the application because of the perceived impact of the sub-station on the local area. In all other respects the relevant Officer’s Report associated with planning application LPA Ref: 2023/00579/F confirms that the application submission was acceptable.

The need for electric vehicles (EV) charging is significant and well documented and is an integral part of the Government’s aspiration to achieving Net Zero. As such, the need for the application proposal is a relevant material consideration. EV charging infrastructure is now common on service station sites and is necessary in order to provide EV charging on the site.

The required sub-station is to be provided under Permitted Development Rights (PDR) and does not form part of this application. As such, any issues relating to any future sub-station is not a matter of consideration for this application. JMS Planning, as agent for the Applicant, confirms unequivocally that the Applicant will be installing the sub-station under Permitted Development Rights. This is also confirmed in a relevant letter form the Applicant’s Project Manager which is an appendix to the supporting Planning Statement.

The Applicant considers the proposed application is of merit. Notably; the application will:

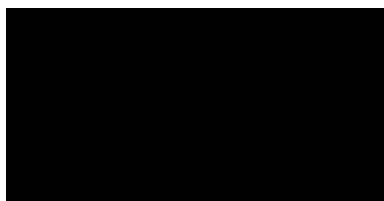


- Provide a low carbon refuelling facility which will help meet the UK's legally binding target to reduce total CO₂ emissions by at least 80% (relative to 1990 levels) by 2050;
- Provides EV charging infrastructure in an area of deficiency;
- Assist in reducing the reliance on oil-based fossil fuels for road transport in accordance with Development Plan policy and national aspirations;
- Contribute to the establishment of a countrywide electric vehicle recharging infrastructure which will assist in increasing the uptake of electric vehicles; and
- Represent development on an existing, established service station in an appropriate location.

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

I would be grateful for acknowledgement of this planning application marked for the attention of myself at [REDACTED] I will be paying the relevant application fee.

Yours faithfully



Julian Sutton
JMS Planning & Development

Encs