



JMS PLANNING & DEVELOPMENT

PLANNING AND A DESIGN AND ACCESS STATEMENT

IN SUPPORT OF AN APPLICATION BY
MOTOR FUEL GROUP
FOR THE REDEVELOPMENT OF
SALES BUILDING, NEW EV AND JET WASH
BAYS, AND ASSOCIATED WORKS

AT

NORTHUMBERLAND PARK SERVICE STATION
1-13 WILLOUGHBY LANE
LONDON
N17 0QU



Client: Motor Fuel Group – Northumberland Park Service Station
Project: Redevelopment of Sales Building and New EV and Jet Wash Bays
Date: April 2023

JMS Planning & Development Ltd

T: 01986 785038
E: julian@jmsplanning.com



© The contents of this document must not be copied or reproduced in whole or in part without the written consent of JMS Planning & Development Ltd

CONTENTS

SECTION 1:	INTRODUCTION	1
SECTION 2:	MOTOR FUEL GROUP	3
SECTION 3:	SITE LOCATION AND CONTEXT	5
SECTION 4:	PLANNING HISTORY	7
SECTION 5:	THE PROPOSAL	9
SECTION 6:	BACKGROUND TO ELECTRIC VEHICLES	11
SECTION 7:	PLANNING POLICY	13
SECTION 8:	PLANNING ISSUES	28
SECTION 9:	DESIGN AND ACCESS STATEMENT	34
SECTION 10:	CONCLUSIONS	38



SECTION I: INTRODUCTION

- 1.1 This Planning Statement, also incorporating a Design and Access Statement, has been prepared on behalf of Motor Fuel Group ('MFG') and is submitted in support of an application for full planning permission for the demolition of the existing sales building and MOT centre on site and the erection of a new sales building, 4 no. new jet wash bays, amendments to the forecourt canopy, a new bin store, a new air/water vac machine, new parking spaces, a new boundary fence, and associated works at Northumberland Park Service Station, 1-13 Willoughby Lane, London, N17 0QU.
- 1.2 This application is set in the context of the extant planning permission for the site, which was granted in October 2022 for the Demolition of Existing PFS sales building, car wash area and MOT Garage. Construction of new single-story sales building with retail and food-to-go area (Class E/Sui Generis). 2no. New jet wash bays and additional car parking to be installed (HGY/2022/0193). At present, the existing site remains unchanged from the time of the previous application as the approved plan has not yet been implemented.
- 1.3 The site comprises of an existing petrol filling station comprising sales building, forecourt, and EV bays which were recently installed. In addition, there is an MOT centre on site. The site, particularly the sales building, is in need of upgrade as it does not currently meet the needs of motorists. The site is to be partially redeveloped, removing the car wash and providing a new sales building and drive-thru facility. The proposals will optimise the layout of the site, introducing reconfigured car parking and more efficient circulation around the site. These works follow the recent installation of a new EV hub on site. Accordingly, the proposal will bring the petrol filling station up to expected standards to meet the needs of the operator and motorists.
- 1.4 The national need for additional and enhanced petrol filling station facilities is widely recognised and accepted. Whilst the recent closure of 150-200 sites a year has slowed, there continues to be strong competition between fuel retailers, particularly the big four supermarkets, which combined with the increasing costs of compliance with environmental regulations puts those remaining petrol stations under intense pressure. Information from the Experian Catalyst Market Summary Report released in 2020 suggests that there were 8,385 petrol filling stations in the UK compared to the 1967s all time high of 39,958 forecourts. Meanwhile, the total number of vehicles on the road rose to a record breaking 39.5 million as at the end of March 2020 with each forecourt supplying an average of 4,715 vehicles. Petrol filling stations are a vital necessity and can often function as a community hub and are facing significant threats in a harsh economic climate. Petrol stations have been likened to post offices and local shops as vital community facilities which are rapidly disappearing.



- 1.5 Given the significant year-on-year decline in petrol filling stations juxtaposed with a year-on-year increase in registered cars on the road, the opportunity to deliver an enhanced petrol filling station, meeting a recognised local need and to complement the wider strategic road network, should be embraced.
- 1.6 Northumberland Park Petrol Filling Station, as proposed, will offer all of the latest facilities expected by motorists and bring the facility up to modern day standards.
- 1.7 This report continues in Section 2 which provides some background on the Applicant. Section 3 sets out a summary of the site's location and its context, with a brief summary of the planning history for the site within Section 4. Full details of the proposal are set out in Section 5 including a detailed description of the layout and facilities to be offered on the site, while Section 6 provides a background to electric vehicles. Section 7 sets out the planning policy position at national and local level with full justification for the proposal expanded upon in Section 8. Design and Access matters are discussed in Section 9, with conclusions drawn in Section 10.



SECTION 2: MOTOR FUEL GROUP

- 2.1 Motor Fuel Group (MFG) is the largest independent forecourt operator in the UK. The Company currently has around 918 stations operating under the BP, Shell, Esso, Texaco, JET and Murco fuel brands.
- 2.2 MFG is backed by committed investors and is focused on growing and developing the business into one of the most dynamic and profitable independent forecourt operators in the UK.
- 2.3 MFG completed the acquisition of the retail assets of Murco Petroleum on 1 October 2014. In April 2015 90 Shell branded stations were acquired and then following this, the Company acquired the north-west based Synergie Holdings with 19 stations and the north-east based Roadside Group with 10 stations. In 2017, MFG acquired four stations each from FW Kerridge and Burns & Co, nine stations from Macclesfield-based Manor Service Stations and 14 stations from the Golden Cross Group.
- 2.4 From 1 April 2015, MFG decided to launch Murco as a dealer brand. The 180 strong dealer network will continue to use this well recognised brand and with its dedicated team Murco intends to grow, develop and strengthen a very flexible dealer offer, building on the great service and delivery standards that Murco has always been known for.
- 2.5 At the end of February 2018, MFG announced the £1.2 billion acquisition of MRH, bringing nearly 500 stations and the Greggs, SPAR and its own Hursts brands into the network.
- 2.6 MFG intends to continue to offer its customers premium fuel brands coupled with an attractive, competitive and expanding forecourt shop offer for today's cost-conscious consumers. The Company's key objective is to make all visits to a MFG forecourt as pleasurable as possible. They aim to provide our customers with high levels of service; good quality, competitively priced fuels and, of course, a convenient and competitive shopping experience.
- 2.7 The Company's intention is to ensure that its shops provide customers with an exceptional product range and '*food to go*' offer from top name brands, ongoing value promotions and a shopping environment to match any of the multiples, whilst the forecourts met the need of motorists.
- 2.8 In July 2020 the Group was ranked 8th in a league table of Britain's one hundred private companies with the largest sales in the 19th annual Sunday Times' HSBC Top Track 100.



- 2.9 As the UK's leading independent roadside fuel operator, MFG is now embarking on an ambitious nationwide programme of electric vehicles (EV) charging infrastructure throughout its existing estate. This will play an important role in the UK's energy transition and support the uptake of EV within the UK.

Proposed Investment in New EV Infrastructure

- 2.10 Over the next decade MFG plans to invest circa £400m in ultra-rapid, 150kW and 350kW EV chargers across its UK network with the intention to install a total of circa 3,000 ultra-rapid 150kW and 350kW EV chargers at over 500 sites by the end of 2030.



SECTION 3: SITE LOCATION AND CONTEXT

- 3.1 The application site is an island site bounded by Northumberland Park to the north and west, and Willoughby Lane to the east. Northumberland Park Train Station is approximately 100 metres to the south-east.
- 3.2 The site comprises a petrol filling station with a Shell fascia and with associated MOT centre. The MOT centre is to the north of the site, with the building aligning Northumberland Park. The petrol filling station sales building, operating under the Londis brand, is directly to the south of the MOT centre building. The sales building comprises an ATM to the front and an Amazon locker to the side. There is also an air/water unit and vacuum unit to the side of the sales building. The site has a sui generis use.
- 3.3 The petrol filling station forecourt, comprising pumps, pump islands and canopy, are to the south of the sales building, in the centre of the site. There are four pump islands in a four-square formation, providing re-fuelling facilities for up to eight cars at any one time. To the west of the forecourt is a jet wash and manual car wash with associated plant.
- 3.4 To the south-west of the site is the EV charging hub, comprising 4 no. EV charging bays which were recently installed under planning permission refs. HGY/2020/2254 and HGY/2021/0339. Associated infrastructure, including an HV/LV substation, is located to the south of the site.
- 3.5 There is no formal car parking – parking is ad hoc around the site, both for the petrol filling station as well as the MOT centre. Access to the site is from the south-east, off Willoughby Lane. Circulation around the site is one-way, and vehicles exist to the north-east of the site back onto Willoughby Lane.
- 3.6 The site has a low brick boundary wall to the east elevation, separating the site from Willoughby Lane. There is 2m high metal security railing surrounding the site to the west and north.
- 3.7 In terms of surrounding land uses, this is primarily residential in nature. There are two-storey terraced properties on the opposite side of Willoughby Lane. To the north of the site, on the opposite side of Northumberland Park, is a five-storey flatted residential development – Charles Bradlaugh House. To the west of the site, on the opposite side of Northumberland Park, are further two-storey terraced properties, although these face on to Anglia Close rather than towards the application site. Northumberland Park, to the west of the site, is a bus terminal / bus stop. Vehicular access is limited to buses only.
- 3.8 The site is not in a conservation area, nor is it in the vicinity of any listed buildings.
- 3.9 In terms of accessibility, the site is within PTAL rating 3.

- 3.10 The site is in Flood Zone 2.
- 3.11 As mentioned, the site has recently received planning permission for its redevelopment. However, works have not yet started and this application seeks to put forward a new and improved site to that permitted.

SECTION 4: PLANNING HISTORY

- 4.1 A planning history search has been undertaken for the site using London Borough of Haringey's Planning website. There have been a number of planning permissions for the site, both for the petrol filling station and the MOT centre, some within recent years. These are outlined below.

Ref.	Proposal	Decision
HGY/2022/0193	Demolition of Existing PFS sales building, car wash area and MOT Garage. Construction of new single-story sales building with retail and food-to-go area (Class E/Sui Generis). 2no. New jet wash bays and additional car parking to be installed.	Granted 10/10/22
HGY/2021/0604	Installation of 5m EV Pole Sign	Granted 31/03/21
HGY/2021/0339	Additional 1no. EV Charger bay, 1no. EV Power pack and enlarged Canopy. Relocation of 1no. Pump island.	Granted 16/02/21
HGY/2020/2254	Installation of vehicle charging points and associated electrical infrastructure.	Granted 22/10/20
HGY/2016/3287	Advertisement consent application for internally illuminated ATM fascia and halo illumination to ATM surround.	Granted 23/11/16
HGY/2016/3285	Retention of standalone ATM and associated structure	Granted 15/11/16
HGY/2012/1400	Display of 2 x internally illuminated and 7 x non-illuminated fascia signs, 4 x over pump spreader panels, 8 x stanchion poster frames, 8 x pump number ears, 4 x grade panels, various pole-mounted signs, 1 x wall mounted poster sign, 1 x wall mounted vinyl board (all non-illuminated) and 1 x internally illuminated price sign steel frame structure.	Granted 03/09/12
HGY/2004/1597	Demolition of existing sales building and workshop to increase forecourt area and erection of new sales building.	Granted 02/09/04

Ref.	Proposal	Decision
OLD/1988/2103	Display of internally illuminated signs to canopy + erection of pole mounted company sign.	Granted 28/09/88
OLD/1988/2102	Conversion of work - shop to convenience store and extension of existing petrol filling station sales building.	Granted 13/09/88

- 4.2 Overall, the planning history of the site demonstrates it has a long-established petrol filling station use, since at least the 1980s. Planning permission was granted in 2020 and 2021 for the installation of EV charging points, which have been subsequently implemented. This application builds upon the recently approved HGY/2022/0193 application, which introduced a range of improvements across the site. This application simply seeks to further enhance the site.



SECTION 5: THE PROPOSAL

- 5.1 The application site currently comprises an existing petrol filling station (comprising sales building of approx. 64 sqm GEA with a sales area of 34sqm), forecourt with canopy providing four islands providing fuelling positions for eight cars, EV charging spaces and car wash/jet wash, as well as an MOT centre (comprising a building of approx. 342 sqm GEA).
- 5.2 The application proposes the demolition of the existing sales building and MOT centre on site and the erection of a new sales building to include 2 no. food to go facilities. The new sales building has a GIA of 307 sqm, with a retail area and food-to-go area of 130 sqm each. The building will be single storey with a modern, glazed frontage. As well as providing a retail sales area and food preparation area for the food to go facility, the sales building will also provide customer an accessible WC, paying facilities for the fuel, and an ATM. The sales building will include a back of house area for stock and staff facilities.
- 5.3 The sales building is proposed to be modern in appearance, utilising lightweight materials to create a clean and crisp appearance. The sales building makes extensive use of glazing to the forecourt, allowing visitors to the site and passers-by to witness activity occurring within this area of the building thereby assisting in creating visual interest. This will also allow staff to have a view of the forecourt ensuring safety and security at all times.
- 5.4 A new bin store is proposed to the side of the sales building – this will be accessed from the back of house area in the sales building. Access will also be provided externally, although this will only be used by staff.
- 5.5 New formal car parking is proposed to the front of the sales building – in total, 9 no. parking bays will be provided including 1 no. DDA accessible parking space which will be conveniently located to the store entrance. A new air/water machine and vac machine is to be installed adjacent to the new EV bays.
- 5.6 Four new jet wash bays are proposed to the west of the sales building. These will comprise 2.5m high glazed screens, three out of the four bays will be covered, one will be open. The existing jet and car wash to the west of the forecourt will be removed, and 4 no. new EVC bays are proposed in their place.
- 5.7 Having regard to the forecourt, this will largely remain as existing. The existing canopy soffit will be raised to 5200mm in height – again, this is to facilitate circulation and ensure that larger HGV vehicles can comfortably access the site.
- 5.8 The existing EV charging bays to the south-west of the site will remain unchanged.



- 5.9 The proposal does not propose any change the existing access arrangements. Vehicular access and egress will be maintained from Willoughby Lane. Circulation through the site will be formalised, with parking bays marked out, as identified above. A pedestrian walkway will be provided to the front of the sales building, to ensure safe access for pedestrians.
- 5.10 A new 2m high boundary fence is proposed around the site.



SECTION 6: BACKGROUND TO ELECTRIC VEHICLES

- 6.1 Powering more of the cars we drive with electricity is essential to addressing growing CO₂ emissions and air pollution in cities. As more electric car models become available, they will also become a more affordable choice for people and businesses.
- 6.2 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.
- 6.3 Electric vehicles are cars and other forms of mobility that use an electric motor as their main source of propulsion, rather than a conventional engine. They also have their energy stored in batteries.
- 6.4 There are three main types of electric vehicles; battery electric vehicles, hybrid electric vehicles and plug-in hybrid electric vehicles.
- 6.5 Battery electric vehicles are all electric cars that rely on their batteries as the only source of energy. Hybrid and plug-in hybrid electric vehicles combine electric drive with a conventional fuel engine.
- 6.6 Unlike traditional cars, which usually refuel at petrol stations, electric cars have the potential to be recharged at home, at work or on the go. They can also be charged in shared locations such as forecourts, car parks or supermarkets. Speed, availability and the reliability of charging infrastructure are currently the biggest potential deterrents to buying an electric car. It is believed this could be changed with better access to recharging options, better suited to the needs of customers and their lifestyles. This could include smart, regular chargers, ideal for those charging overnight at their homes or during working hours. It could also include high powered, fast chargers designed for when drivers are between destinations and in need of a quick top-up.
- 6.7 As electric charging networks grow to provide electric vehicle drivers access to a wider and reliable infrastructure, electricity systems will need to be prepared to provide the additional power required. Intelligent charging technologies can help ensure the smooth integration of electric vehicles into electricity systems by, for example, adjusting charging times and speed of charge. This can be especially useful for managing variations in wind and solar power. Innovative vehicle to grid (V2G) charging systems allow electric vehicles to supply electricity to a local power network when supplies are tight. V2G power control effectively turns an electric vehicle into a back-up battery that can help grid operators balance electricity supply and demand.



- 6.8 The proposal includes the provision of four EV charging bays which will have the benefit of bringing the energy transition closer to the area and offer increased choice and improved customer experience across the wider site in a sustainable manner.



SECTION 7: PLANNING POLICY

- 7.1 This Section sets out an overview of national policy and development plan guidance relevant to the redevelopment of the existing petrol filling station use, including policies relevant to design and access matters.

National Planning Policy

National Planning Policy Framework

- 7.2 The revised National Planning Policy Framework (NPPF) was updated in July 2021 and constitutes guidance for local planning authorities and decision-takers and is a material consideration in the determination of planning applications (paragraph 2).
- 7.3 The purpose of the planning system is to contribute to the achievement of sustainable development (paragraph 7). Reference has recently been added to the 17 Global Goals for sustainable development set by the United Nations.
- 7.4 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.

- 7.5 These objectives should be delivered through the preparation and implementation of plans and application of policies in the framework; they are not criteria against which every decision can or should be judged. It is confirmed that the planning system should play an active role in guiding development to sustainable solutions, but in doing so should take local circumstances into account, to reflect the character, needs and opportunities of each area (paragraph 9).
- 7.6 At the heart of the NPPF is a presumption in favour of sustainable development (paragraph 10). For decision taking, this means:
- Approving development proposals that accord with the Development Plan without delay, and
 - 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;
 - The application of policies in the framework that protect areas or assets of particular importance provides clear reason for refusing the development proposed; or
 - 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 (paragraph 11).
- 7.7 The presumption in favour of sustainable development does not change the statutory status of the Development Plan as the starting point for decision making (paragraph 12).
- 7.8 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).
- 7.9 Planning law requires that applications for planning permission be determined in accordance with the Development Plan unless material considerations indicate otherwise. Decisions on applications should be made as quickly as possible, and within statutory timescales unless a longer period has been agreed by the applicant in writing (paragraph 47). Local Authorities may give weight to relevant policies and emerging plans according to the stage at which they are at and the extent of unresolved objections (paragraph 48).



- 7.10 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).
- 7.11 Planning policies should set out a clear economic vision and strategy which positively and practically encourages sustainable economic growth having regard to local industrial strategies and other local policies for economic development and regeneration; set criteria to identify strategic sites for local inward investment to match the strategy and meet anticipated needs over the plan period; seek to address potential barriers to investment; and be flexible enough to accommodate the needs not anticipated in the plan, allow for new and flexible working practices and to enable a rapid response to changes in economic circumstances (paragraph 82).
- 7.12 Planning policies and decisions should recognise and address the specific locational requirements of different sectors (paragraph 83).
- 7.13 Planning policies and decisions should support the role that town centres play at the heart of local communities taking a positive approach to their growth management and adaptation. Policies should define a network and hierarchy of town centres and promote their long term vitality and viability; define extent of town centres and primary shopping areas; retain and enhance existing markets and, where appropriate, reintroduce or create new ones; allocate a range of suitable sites in town centres to meet the scale and type of development likely to be needed looking at least 10 years ahead; where suitable and viable town centre sites are not available for main town centre uses, allocate appropriate edge of centre sites that are well- connected to town centres and if these are not able to be identified, set out policies which should explain how identified needs can be met in other accessible locations that are well- connected to the town centre; and recognise that residential development often plays an important role in ensuring the vitality of centres and encouraging residential development on appropriate sites (paragraph 86).
- 7.14 Local Planning Authorities should apply a Sequential Test to planning applications for main town centre uses which are neither in an existing centre nor in accordance with an up-to-date plan. Main town centre uses should be located in town centres, then in edge of centre locations and only if suitable sites are not available (or expected to become available within a reasonable period of time) should out of centre sites be considered (paragraph 87).



- 7.15 When considering edge of centre or out of centre proposals, preference should be given to accessible sites which are well-connected to the town centre. Applicants and Local Planning Authorities should demonstrate flexibility on issues such as format and scale, so that opportunities to utilise suitable town centres or edge of centre sites are fully explored (paragraph 88).
- 7.16 When assessing applications for retail and leisure development outside town centres, which are not in accordance with an up-to-date plan, Local Authorities should require an Impact Assessment if the development is over a proportionate locally set floorspace threshold and if there is no locally set threshold the default threshold is 2,500 sqm of gross floorspace. This should include assessment of the impact of the proposal on existing, committed and planned public and private investment in a centre or centres in the catchment area of the proposal; and the impact of the proposal on town centre vitality and viability, including local consumer choice and trade in the town centre and the wider retail catchment (paragraph 90).
- 7.17 Paragraph 106 confirms that planning policies should provide for any large scale transport facilities that need to be located in the area, and the infrastructure and wider development required to support their operation, expansion and contribution to the wider economy. The footnote to this paragraph notes that such facilities will include roadside services but that the primary purpose of these services should be to support the safety and welfare of the road user (and most such proposals are unlikely to be nationally significant infrastructure projects).
- 7.18 Planning policies and decisions should promote an effective use of land in meeting the needs for homes and other uses, whilst safeguarding and improving the environment and ensuring safe and healthy living conditions (paragraph 119).
- 7.19 The creation of high-quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps to make development acceptable to communities. Being clear about design expectations, and how these will be tested, is essential for achieving this. So too is the effective engagement between applicants, communities, Local Planning Authorities and other interests throughout the process (paragraph 126).

- 7.20 Planning policies and decisions should ensure that developments will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development; are visually attractive as a result of good architecture, layout and appropriate and effective landscaping; are sympathetic to local character and history; establish or maintain a strong sense of place; and create places that are safe, inclusive and accessible and which promote health and well-being with a high standard of amenity for existing and future users (paragraph 130).
- 7.21 Trees make an important contribution to the character and quality of urban environments, and can also help mitigate and adapt to climate change. Planning policies and decisions should seek to ensure opportunities are taken to incorporate trees in developments, retain existing trees and ensure their long term maintenance (paragraph 131).
- 7.22 Design quality should be considered throughout the evolution and assessment of individual proposals (paragraph 132). Development that is not well designed should be refused especially where it fails to reflect local design policies and government guidance taking into account local design guides and codes (paragraph 134).

Development Plan

- 7.23 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).
- 7.24 The Development Plan for the site comprises the London Plan (adopted March 2021), Haringey Strategic Policies DPD (adopted 2013 and updated July 2017), Development Management DPD (adopted July 2017), Tottenham Area Action Plan (AAP) Development Plan Document (DPD) (adopted July 2017) and Site Allocation DPD (adopted July 2017). There is currently no neighbourhood plan covering the application site.
- 7.25 On the adopted Proposals Map, the site is allocated as Northumberland Park Estate Renewable in the Tottenham AAP (Policy NT4). The site also falls within a Growth Area. The site falls within Flood Zone 2.

The London Plan (March 2021)

- 7.26 Policy GG1 (Building Strong and Inclusive Communities) confirms that good growth is inclusive growth. This policy requires those involved in planning and development to build on the city's tradition of openness, diversity and quality and help to deliver strong and inclusive communities. The policy sets out a number of criteria including; seek to ensure changes to the physical environment to achieve an overall positive contribution to London; provide access to good quality community spaces, services, amenities and infrastructure that accommodate, encourage and strengthen communities, increasing active participation and social integration and addressing social isolation; seek to ensure that London continues to generate a wide range of economic and other opportunities, and that everyone is able to benefit from these to ensure that London is a fairer, more inclusive and equal city; ensure that streets and public spaces are consistently planned for people to move around and spend time in comfort and safety, creating places where everyone is welcome, which foster a sense of belonging, which encourage community buy in and where community can develop and thrive; ensure that new buildings and the spaces they create are designed to reinforce or enhance identity, legibility, permeability and inclusivity of neighbourhoods and are resilient and adaptable to changes in community requirements, and ensuring that an inclusive London is created, minimising barriers, challenges and inequalities.
- 7.27 Policy GG2 (Making the Best Use of Land) provides advice on creating successful, sustainable, mixed-use places that make best use of land. This policy encourages those involved in planning and development to:
- Enable the development of brownfield land;
 - Prioritise sites which are well connected by existing and planned public transport;
 - Protect and enhance London's open spaces, including the Green Belt, Metropolitan Open Land and other designated spaces, including aiming to secure net biodiversity gains where possible; and
 - Plan for good walking, cycling and public transport connections.
- 7.28 Policy GG3 (Creating a Healthy City) seeks to improve Londoners' health and reduce health inequalities and sets out a number of considerations to improve the mental and physical health of Londoners and reducing health inequalities. These include:
- The promotion of more active and healthy lives for all Londoners to enable them to make healthy choices; and
 - Seek to improve London's air quality.

- 7.29 Policy GG5 (Growing a Good Economy) seeks to conserve and enhance London's global, economic and competitiveness and ensure that economic success is shared amongst all Londoners. This is to be achieved by:
- Promote the strength and potential of the wider city region;
 - Seek to ensure that London's economy diversifies and that the benefits of economic success are shared equitably across London;
 - Plan for sufficient employment and industrial space in the right locations to support economic development and regeneration; and
 - Recognise and promote the benefits of transition to a low carbon circular economy to strengthen London's economic success.
- 7.30 Policy GG6 (Increasing Efficiency and Resilience) aims to help London become a more efficient and resilient city and specifically supports improved energy efficiency and the move towards a low carbon circular economy, contributing to London becoming a zero carbon city by 2050.
- 7.31 Policy SD7 (Town Centres: Development Principles and Development Plan Documents) confirms the town centre approach to the consideration of development proposals discouraging out of centre development. The policy sets out the sequential test to application for main town centre uses, requires impact assessments for proposals of new or extensions to existing edge or out of centre development for retail, leisure and office uses that are not in accordance with the Development Plan (albeit does not set a floorspace threshold relying on the NPPF or locally set figures). The policy sets guidance to Boroughs as to how this policy's aspirations can be achieved at a more detailed level.
- 7.32 Policy D1 (London's Form, Character and Capacity for Growth) provides guidance on defining an area's character to understand its capacity for growth, and then planning for growth. This policy encourages Boroughs to undertake area assessments to define the characteristics, qualities and values of different places within the Plan area for developers to understand the different areas capacity for growth.
- 7.33 Policy D3 (Optimising Site Capacity Through the Design Led Approach) seeks to ensure that all development makes the best use of land by following a design led approach that optimises the capacity of sites, which means ensuring that development is of the most appropriate form and land use for the site. This policy requires consideration to form and layout and seeks to encourage and facilitate active travel with convenient and inclusive pedestrian and cycle routes, crossing points, cycle parking and legible entrances to buildings that are aligned with people's movements, patterns and desire lines in the area.

- 7.34 Policy D3 also seeks to encourage safe, secure and inclusive environments, active frontages and appropriate relationships between inside and outside of buildings, appropriate outlook, privacy and amenity, prevention of impacts of noise and poor air quality and environments which are comfortable and inviting for people to use. The policy also encourages consideration to the character of the area, developments to be of high quality and aim for high sustainable standards.
- 7.35 Policy D4 (Delivering Good Design) confirms that Design and Access Statements should be submitted with development proposals to demonstrate that the proposal meets the design requirements of the London Plan. The policy sets out guidance for Design Reviews (the proposal falls below the threshold for Design Reviews).
- 7.36 Policy D5 (Inclusive Design) seeks to ensure that development proposals achieve the highest standards of accessible and inclusive design. They should:
- Be designed to take into account London's diverse population;
 - Provide high quality people focused spaces that are designed to facilitate social interaction and inclusion;
 - Be convenient and welcoming with no disabling barriers, providing independent access without additional undue effort, separation or special treatment;
 - Be able to be entered, used and exited safely, easily and with dignity for all; and
 - Be designed to incorporate safe and dignified emergency evacuation for all building users.
- 7.37 Policy D5 also requires that a Design and Access Statement be submitted as part of development proposals and should include an Inclusive Design Statement.
- 7.38 Policy D13 (Agent of Change) confirms that the 'agent of change' principle places the responsibility for mitigating impacts from existing noise and other noise generating activities or uses on the proposed new noise sensitive development.
- 7.39 Policy D14 (Noise) confirms that in order to reduce, manage and mitigate noise to improve health and quality of life, residential and other non-aviation development proposals should manage noise by avoiding significant adverse noise impacts on health and quality of life, reflecting on the 'agent of change' principle as set out in Policy D13, mitigate and minimise the existing and potential adverse impacts of noise as a result of, or in the vicinity of, new development without placing unreasonable restrictions on existing noise generating uses, improving and enhancing the acoustic environment and promoting appropriate soundscapes, separating new noise sensitive development from major noise sources and, where necessary, control and

mitigate any potential adverse effects by applying good acoustic design principles.

- 7.40 Policy E2 (Providing Suitable Business Premises) confirms that Boroughs should include policies in Local Development Plan documents that support the provision, and where appropriate, protection of a range of B Use Class business space to meet the needs of micro, small and medium sized enterprises and to support firms wishing to start-up or expand. Development proposals that involve the loss of existing B Use Class business space in areas identified in Local Development Plan document, where there is a shortage of lower cost space or workspace in particular types, uses or sizes should:
- Demonstrate that there is no reasonable prospect of the site being used for business purposes; or
 - Ensure that an equivalent amount of B Use Class business space is re-provided in the proposal which is appropriate in terms of type, use and size, incorporating existing businesses where possible and include affordable workspace where appropriate.
- 7.41 Policy E9 (Retail Markets and Hot Food Takeaways) confirms that plans should provide guidance on the provision of such uses and guidance in relation to managing existing edge of centre and out of centre development. This policy provides guidance on hot food takeaways, albeit due to the nature of the proposal does not strictly relate to this application.
- 7.42 Policy S11 (Improving Air Quality) confirms that Development Plans, through relevant strategic, site specific and area-based policies should seek opportunities to identify and deliver further improvements to the air quality and should not reduce air quality benefits that result from the Mayor's or Borough's activities to improve their quality. To tackle poor air quality, protect health and meet legal obligations, development proposals should not lead to further deterioration of existing poor air quality, create new areas that exceed air quality limits or create unacceptable risk of high levels of exposure to air quality. Major development proposals are required to be submitted with an Air Quality Assessment, albeit the application proposal falls below this requirement.
- 7.43 Policy S12 (Minimising Greenhouse Gas Emissions) requires that major development should be net zero carbon, which means reducing greenhouse gas emissions in operation and minimising both annual and peak energy demand in accordance with the following green hierarchy; be lean, be clean, be green, be seen. Major development proposals will be required to include a detailed energy strategy, albeit the proposal will fall below this requirement.
- 7.44 Policy S14 (Managing Heat Risk) requires the development proposals should minimise the adverse impacts on the urban heat either through design, layout, orientation, materials and incorporation of green infrastructure.

- 7.45 Policy SI7 (Reducing Waste and Supporting the Circular Economy) seeks resource conservation, waste reduction, increasing material reuse and recycling and reductions in waste going for disposal. This policy requires developments to be designed with adequate, flexible and easily accessible storage space and collection systems that support, as a minimum, the separate collection of dry recyclables and food.
- 7.46 Guidance in relation to Flood Risk Management is set out in Policy SI12 which requires developments to ensure that flood risk is minimised and mitigated, and that residue risk is addressed.
- 7.47 Policy SI13 relates to Sustainable Drainage and requires development to aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible. The policy sets out a hierarchy for drainage where the use of rainwater as a resource is at the top, followed by rainwater infiltration to ground or close to source, rainwater attenuation and green infrastructure features, rainwater discharge direct to a watercourse, controlled rainwater discharged to a surface water sewer or drain or controlled rainwater discharge to a combined sewer. Drainage should be designed and implemented in ways that promote multiple benefits including increased water use efficiency, improved water quality and enhanced biodiversity, greening infrastructure, amenity and recreation.
- 7.48 Policy T4 (Assessing and Mitigating Transport Impacts) confirms that where required, in accordance with national and local guidance, Transport Assessment/Statements should be submitted with development proposals to ensure that the impacts on the capacity of the transport network, at network wide and strategic levels are fully assessed.
- 7.49 Policy T5 (Cycling) confirms that development proposals should help remove barriers to cycling and create a healthy environment in which people choose to cycle. Cycle parking should be designed and laid out in accordance with the guidance contained in the London Cycle Design Guides.
- 7.50 Policy T6 (Car Parking) confirms that car parking should be restricted in line with levels of existing and future public transport accessibility and connectivity and maximum car parking spaces will be applied. Disabled provision should be made, and provision should be made for infrastructure by electric or other ultra-low emission vehicles in line with policies in the Local Plan. Specifically, new or re-provided petrol stations should provide rapid charging hubs and/or hydrogen refuelling facilities.

- 7.51 Policy T6.5 (Non-Residential Disabled Persons' Parking) confirms that disabled persons' parking should be provided in accordance with the levels set out in Table 10.6 (which does not specifically mention petrol stations) or to at least one on or off-street disabled parking persons' bay. The disabled bay should be located on firm and level ground, as close as possible to the building entrance or facility they are associated with.
- 7.52 Policy T7 (Deliveries, Servicing and Construction) seeks to facilitate sustainable freight movement by rail, water and road. Developments should facilitate safe, clean and efficient deliveries and servicing.

Haringey's Development Plan

- 7.53 As identified above, the site is allocated as Northumberland Park Estate Renewable in the Tottenham AAP, is located within a Growth Area, and is within Flood Zone 2.

Local Plan Strategic Policies 2013 (with alterations 2017)

- 7.54 Policy SPO (A Presumption in favour of Sustainable Development) reflects guidance set out in the NPPF.
- 7.55 Policy SP1 (Managing Growth) confirms that the Council will focus Haringey's growth in the most suitable locations and manage to make sure the Council delivers the opportunities and benefits and achieve strong, health and sustainable communities for the whole of the Borough. The Policy confirms that the Council will promote development in particular areas which are considered Growth Areas – this includes North Tottenham (which includes Northumberland Park). The Council will expect development in the Growth Areas to (inter alia) maximise site opportunities, provide appropriate benefits for the surrounding areas and communities, and provide the necessary infrastructure.
- 7.56 At paragraph 3.1.25 of the Strategic Policies document, Northumberland Park is recognised as being one of the most severely deprived areas not only in Haringey but the whole country. The Council's aspirations for Northumberland Park include appropriate contributions to regeneration initiatives, and high quality, sustainable design that respects its surroundings.
- 7.57 Policy SP5 (Water Management and Flooding) states that the Council will require all development in Haringey to be water efficient during construction and operation and to reduce all forms of flood risk. In particular, development should take account of flood risk vulnerability classification and apply the NPPF Sequential and Exception Tests.
- 7.58 Policy SP6 (Waste and Recycling) sets out guidance to achieve the objectives of sustainable waste management. This includes designing refuse storage and recycling into all new developments.

- 7.59 Policy SP7 (Transport) provides guidance in relation to promoting a number of infrastructure proposals to support Haringey regeneration and local/strategic access of London, employment areas and local services.
- 7.60 Policy SP8 (Employment) seeks to secure a strong economy in Haringey and protects the Borough's hierarchy of employment land. The forecast demand is for an additional 23,800m² of B Class floorspace up to 2026, and this is to be met through (inter alia) the protection of existing viable B class uses on designated and non-designated sites.
- 7.61 Policy SP11 (Design) confirms that all new development should enhance and enrich Haringey's built environment creating places and buildings that are of a high quality, attractive, sustainable, safe and easy to use. The Policy continues by setting out a number of criteria as follows:
- Be at the highest standards of design that respects local context and character and historical significance to contribute to the creation and enhancement of Haringey's sense of place and identity;
 - Ensure impacts on health, climate change, natural resources and biodiversity are minimised by adapting and improving sustainable design and construction techniques;
 - Incorporate solutions to reduce crime and the fear of crime such as promoting social inclusion, creating well contained and high quality public realm that is easy and safe to use and by applying the principle set out in Secure by Design and Safer Places;
 - Create high quality landscaping on and off-site including improvements to existing streets and public spaces;
 - Seek the highest standard of access in all buildings and places; and
 - Ensure buildings are designed to be flexible and adaptable and able to integrate services and functions.

Development Management DPD (July 2017)

- 7.62 Policy DM1 (Delivering High Quality Design) confirms that all new development and change of use must achieve a high standard of design and contribute to the distinctive character and amenity of the local area. The Council will support design lead development proposals which meet the following criteria:
- a. Relate positively to neighbouring structures new or old to create a harmonious whole;
 - b. Make a positive contribution to a place improving the character and quality of an area;
 - c. Confidently address feedback from local consultation;
 - d. Demonstrate how the quality of the development will be secured when it is built;

- e. Are inclusive and incorporate sustainable design and construction principles.
- 7.63 The Policy continues by setting out design standards making reference to the character of development, landscaping, privacy and amenity. With reference to the latter, development proposals must ensure a high standard of privacy and amenity for development users and neighbours respecting amenity and addressing issues of vibration, noise, fumes, odour, light pollution, and microclimate conditions that are likely to arise from the use and activities of the development.
- 7.64 Policy DM2 (Accessible and Safe Environments) requires that new development can be used safely, easily and with dignity by all, designed to improve people's access to social and community infrastructure including local shops and public transport; respect pedestrian and cycling routes and have regard to the principle set out in 'Secured by Design'.
- 7.65 Policy DM3 (Public Realm) ensures that public spaces are secure, accessible and inclusive environments which are positively managed to a high standard.
- 7.66 Policy DM8 provides specific guidance on shop fronts, signs and on street dining. Whilst not directly relevant to the proposal as it relates to a petrol filling station, the Policy does confirm the requirement for high quality design in shop front design to create safe and attractive environments.
- 7.67 Policy DM21 (Sustainable Design, Layout and Construction) states that all new development including building and landscaping work will be expected to consider and implement sustainable design, layout and construction techniques. Proposals should apply the energy hierarchy to minimise energy use in order to meet, and if possible exceed, minimum carbon dioxide reduction requirements; apply the cooling hierarchy to reduce the potential for overheating and limit reliance on mechanical air conditioning systems; maximise opportunities to enhance biodiversity on the site through appropriate landscaping, Sustainable Drainage Systems, living roofs and green walls; wherever possible, use building materials with high environmental performance ratings; and seek opportunities for locally sourced labour.
- 7.68 Guidance in relation to environmental protection is set out in Policy DM23 which seeks consideration to air quality, noise and vibration, light pollution, contaminated land and hazardous substances.

- 7.69 Policy DM24 (Managing and Reducing Flood Risk) states that the Council will ensure that all proposals for new development avoid and reduce the risk of flooding to future occupants and do not increase the risk of flooding. All proposals for new development within Flood Zone 2 and 3a will be required to provide sufficient evidence for the Council to assess whether the requirements of the Sequential Test and Exception Test, where required, have been satisfied. Proposals must be informed by a site-specific Flood Risk Assessment (FRA) taking account of all potential sources of flooding. All proposals for new development will be required to manage and reduce surface water run-off, and manage water and wastewater discharges.
- 7.70 Policy DM31 (Sustainable Transport) sets out the general objectives to reduce reliance on cars and increase the opportunities for walking, cycling and the use of public transport.
- 7.71 Guidance in relation to parking is set out in Policy DM32 which seeks to ensure standards set out in the London Plan are met and lists a number of other considerations including the provision of parking for disabled people.
- 7.72 Part (A) of Policy DM40 (Non-Designated Employment Land and Floorspace) states that, on non-designated employment sites within highly accessible or otherwise sustainable locations, the Council will support proposals for mixed-use, employment-led development where this is necessary to facilitate the renewal and regeneration (including intensification) of existing employment land and floorspace. All proposals for mixed-use development must satisfy the requirements of Policy DM38.A(a-f). According to part (B) of the policy, on all other non-designated employment sites, the loss of employment land and floorspace will only be permitted where it can be demonstrated that the building or land is no longer suitable for continued employment use having regard to:
- a) Feasible alternative employment uses;
 - b) The age and condition of the existing building(s) and the potential for refurbishment or adaptation, in particular to more flexible unit sizes;
 - c) Site layout, access, and relationship to neighbouring uses;
 - d) Periods of long-term vacancy; and
 - e) Evidence of recent, continuous and suitable marketing, covering a minimum period of 3 years.
- 7.73 Subject to part (B), where the Council is satisfied that the loss of non-designated employment land or floorspace is acceptable, support will be given to proposals that deliver community uses either as the sole use or as part of a mixed-use development.
- 7.74 Policy DM47 (Hot Food Takeaways) states that proposals for hot food takeaway shops should be located within town centres and will be permitted where:

- a) It can be demonstrated that the proposal will not result in an overconcentration or excessive clustering of hot food takeaways having regard to the existing number of hot food takeaways within the centre or frontage;
- b) It can be demonstrated that there will be no adverse impact on the vitality and viability of the centre;
- c) There is no unacceptable impact on the amenity of neighbouring uses, either adjacent to and surrounding the development; and
- d) Access, servicing and parking arrangements do not result in an adverse impact on the safety of pedestrians and traffic flows or cause unacceptable increases to traffic and parking.

Site Allocations DPD (adopted July 2017)

- 7.75 Within this document there are no relevant allocations affecting the application site.

Tottenham Area Action Plan (adopted July 2017)

- 7.76 The site is included within the “*NT4: Northumberland Park*” allocation within this document. The vision for this area is comprehensive master planned improvement to improve existing, and create new, residential neighbourhoods through the delivery of a major estate regeneration programme that will include: the provision of additional high-quality housing with an increased range of types, sizes, and tenures; improvements to existing housing stock; new public spaces; and new community infrastructure.
- 7.77 The supporting text recognises that the introduction of Crossrail 2 to Northumberland Park station will create a significant uplift in accessibility within the area, and the Council is therefore planning for higher development densities.



SECTION 8: PLANNING ISSUES

8.1 This Section of the Planning Statement sets out the general planning matters, which should form part of the consideration and determination of this application. Design and access matters are covered within the following Section. Accordingly, the following general planning matters are considered below:

- The principle of development on the site;
- Quantitative need and benefits of the improved facility;
- Job creation benefits;
- Retail issues;
- Residential amenity;
- Parking and Transport; and
- Flood Risk.

Principle of Development of the Site

- 8.2 The principle of development on the site should be accepted given that the site is an existing long established petrol filling station providing an important facility for motorists, which is in need of upgrade in order to meet customers' needs. This has already occurred in part with the introduction of EV to the site. The proposal seeks to provide an enhanced service station to serve the community and local residents of Northumberland Park.
- 8.3 The proposed development will comply with the NPPF which supports development that makes efficient use of land, taking into account the availability and capacity of infrastructure and services. Policies contained within the NPPF also support sustainable development, economic growth and where appropriate development to meet changing needs. The London Plan also seeks to ensure the best use of land.
- 8.4 The proposal should further be supported given that the site is located within a Growth Area, whereby development is promoted. Strategic Policy SP1 confirms that sites in such areas should maximise site opportunities, provide appropriate benefits for the surrounding areas, and provide the necessary infrastructure. The proposals seek to maximise site opportunities through providing an enhanced and more modern petrol filling station facility. The proposals will provide benefits for the surrounding area, as they will result in an improved 'top up' shopping facility for local residents, as well as a new food offer. Finally, the proposals will protect existing infrastructure and ensure its continued existence.



- 8.5 The proposed sales building seeks an uplift in the retail floorspace by approximately 105 sqm, compared to that as existing. The extension will create an improved sales building to the benefit of customers and local residents, creating a more pleasant environment to pay for fuel and shop. The existing shop is compact and cramped and is not an ideal environment for customers or those working within it. The new and improved sales building help to address this, whilst also providing customer toilets.
- 8.6 In addition to improving the retail shopping provision for motorists using the site, given the proximity of the residential hinterland surrounding the site, the application proposal will also provide an enhanced local shopping facility to residents of the surrounding area. As a small shop of only 139 sqm, the proposal will only have a very limited catchment area relating a walk in catchment immediately surrounding the site. As such, the application proposal will provide a local community food offer to the benefit of local residents on the existing, surrounding, estate.
- 8.7 The application site has a sui generis use comprising a petrol filling station with associated MOT operation.
- 8.8 In respect to Policy DM40 (Non-Designated Employment Land and Floorspace) as a sui generis petrol filling station, the site should be considered as a non-designated employment site. Rather, as a sui generis use, the site provides an important function as a community facility primarily as a petrol filling station and fuelling site, including the recent introduction of EV charging. The redevelopment of the site will result in a net growth in job creation on the site (as set out in more detail below) but also will result in an enhanced local community facility, ie enhanced shop with food to go facility to the benefit of local residents.
- 8.9 Both national and Local Planning Policy SPO highlight the presumption in favour of sustainable development, requiring the Council to take a positive approach to approving such development, while securing development that improves the economic, social and environmental conditions of Haringey. The policies require development to be approved wherever possible. Material considerations are further regarded below; however it is not considered that there are any reasons as to why the application should not be granted without delay.
- 8.10 Overall, the proposal bucks the general trend in the decline of petrol filling stations countrywide. The NPPF and Local Plan Policy recognise and promote the need to support economic development, including expanding businesses and to ensure that planning policies are flexible enough to support business needs. The importance of supporting services and infrastructure for road users is acknowledged and this proposal assists in this goal.

Qualitative Need and Benefits of Improved Facility

- 8.11 It is important that adequate facilities are provided for road users to ensure that their basic needs are met and to enable them to comfortably and safely continue their journeys. The provision of enhanced facilities will better meet the needs of those travelling on the surrounding highway network and provide them with the facilities they would expect from a modern petrol filling station facility.
- 8.12 Sales buildings and ancillary facilities are an important part of petrol stations meeting the needs of road users. The proposal seeks to extend and upgrade the existing facility, with an improved sales building including two food-to-go units, with a better on-site configuration to better meet the needs of customers and staff. The internal environment will be significantly improved and enhanced in line with customer requirements and expectations. The new car care facilities and car wash facilities adjacent to the sales building will further assist in meeting customer expectations.
- 8.13 The extended sales building will have further benefits for local residents as it provides essential local community facilities and an enhanced offer for top-up shopping trips. This is in accordance with the London Plan which requires boroughs should ensure sufficient capacity for convenience retail to meet the day-to-day needs of local residents.
- 8.14 The proposal includes the provision of four vehicle EV charging hub meeting the objectives agreed at government level to reduce reliance on fossil fuels and the move to a low carbon economy. Electric vehicles are supported at a national level and in order for this to be achieved it is imperative that adequate charging facilities are provided to meet the needs of motorists
- 8.15 The improved facilities therefore will encourage those with electric vehicles to recharge their vehicles at the site, and the new food offer in particular will provide them with somewhere to go while they are waiting.
- 8.16 Overall, the proposal will bring significant enhancement to an existing petrol filling station, ideally positioned to serve the motorist as well as local residents. Given the general trend and declining numbers of petrol filling stations set against the increasing number of cars on the road, the opportunity to offer an enhanced petrol filling station to meet a local need should be embraced.



Job Creation Benefits

- 8.17 The enhanced proposal will provide a valuable source of jobs, retaining the existing jobs on site and creating an additional five further job opportunities. Many of these jobs will be suitable for local residents, particularly residents who wish to be flexible in the hours they work. The proposal will therefore bring a wide range of economic benefits and accord with the role and focus as contained within the National Planning Policy Framework and adopted Development Plan. The application proposal will therefore result in an overall net gain of jobs on the site.
- 8.18 In addition to the actual jobs created by the development, further jobs will be created in the construction phase of development. There will be other spin off linkages to the benefit of the local area during the construction period itself as, for example, on site construction staff utilise shops and services in the local area during the period of construction.

Retail Issues

- 8.19 The NPPF requires an Impact Assessment for developments involving an additional 2,500 sqm gross or more floorspace. No lower figure is contained within the adopted Local Plan. On this basis the application proposal does not breach the threshold by which a Retail Impact Assessment is required to support the application, thus it implies that retail impact issues should not be of concern in respect of the application.
- 8.20 Notwithstanding, the application site has an existing sales building on it which has a net retail area of 34 sqm. The new shop will have a retail area of 139 sqm, an increase of 105 sqm. The additional floorspace is minimal and the use already exists on site with the new sales building merely creating a more pleasant environment for both the customers visiting the site and those working within it.
- 8.21 It is not considered that there will be any adverse impact arising from the proposal. On this basis it is considered that the proposal accords with the relevant national and local policy in this regard.
- 8.22 Given the proposal is merely for the demolition of the existing sales building and replacement with a new, more modern purpose-built facility with some minor reconfiguration on site, there is no requirement to undertake a Sequential Assessment of the proposal. The proposed use is already operating on the site. Whilst the floor area of the replacement sales building is slightly larger than existing, the offer and the operation of the site remains broadly as existing, albeit it will meet modern standards and provide a more comfortable environment for customers and employees.

- 8.23 The sales building and forecourt on site are intrinsically linked and cannot be separated. Accordingly, any alternative site would need to accommodate both the forecourt, the sales building and associated facilities. Given that its primary purpose is to serve vehicles travelling on the surrounding local road network, its location in any alternative location would not meet this need.

Amenity

- 8.24 The nearest residential occupiers are the terraced properties on Anglia Close, approximately 20 metres to the west of the site; the terraced properties on Willoughby Lane, approximately 20 metres to the east of the site; and the flats to the north, also approximately 20 metres on site.

Noise

- 8.25 Having regard to potential noise impact, the proposals include the installation of four new jet wash bays to the north-west corner of the site. This will create some noise, however this is mitigated by the fact that the existing car and jet wash on site will be removed. In addition, the existing MOT centre creates some degree of noise. This source of noise will be removed as a result of the proposals, which should further improve the noise situation on site.
- 8.26 The application associated with the extant planning permission at the site (HGY/2022/0193), which granted permission for 2 jet wash bays in the same location, was submitted with an accompanying noise assessment. That report assessed the application against the background noise levels and concluded there would be no material noise impact on surrounding occupiers.

Daylight and Sunlight

- 8.27 Turning to daylight and sunlight matters, the built form on site will not be significantly different to that existing. The proposed sales building is largely in the same location as the existing buildings on site. The four new jet wash bays will be approx. 2.5m in height, which will not materially impact any surrounding occupiers in terms of daylight and sunlight. The existing canopy will remain in the same location, however it will be raised to 5200m in height. This is considered to be nominal and will not impact any surrounding occupiers.

Outlook and Privacy

- 8.28 Regarding outlook, the site will comprise a similar density and extent of development to the existing site. It is not considered that surrounding occupiers will notice any perceptible difference in outlook as a result of the proposals, and this will remain largely as existing.



- 8.29 In terms of privacy, the sales building will comprise a glazed frontage facing onto the forecourt. Aside from this, no new windows are proposed which could result in loss of privacy for neighbours.
- 8.30 Overall, the proposals will not result in a loss of outlook or privacy for neighbours.

Conclusion

- 8.31 In conclusion there will be no adverse impact on the amenity of the neighbouring properties. The proposed situation in terms of noise, daylight and sunlight, outlook and privacy will remain largely unchanged to the existing situation.

Parking and Transport

- 8.32 There is no formal car parking on site at present, and cars park on an ad hoc basis. The proposals seek to provide formal, marked out parking bays – 7 no. bays in front of the sales building (including 1 no. DDA bay) and 2 no. bays to the west of the site i.e. 9 no. parking bays in total. In addition, 10 no. vehicles can be accommodated at the pump islands. The proposals will therefore regularise the parking and improve circulation on site.
- 8.33 The recently installed EV bays will be unaffected by the proposals and will remain on site, while an additional 4 EV bays will be provided to the west of the site, reinforcing the site's role as a EVC Hub.
- 8.34 In terms of access and egress, the existing arrangements have been retained as these clearly work operationally. Therefore, there will be no impact on the operation of the adjacent highway. Access within the site will be improved through the changes to the layout with associated benefits to customers.
- 8.35 The addition of further Electric Vehicle Charging on the site should be embraced as is in accordance with the Government's objectives to reduce reliance on fossil fuels and decrease CO² emissions. The provision of additional facilities is important in supporting the growth in ownership of electric vehicles.
- 8.36 Based on the above, the extant permission, and the previously approved schemes on the site, all highway issues have been addressed and there will be no adverse impacts arising.



SECTION 9: DESIGN AND ACCESS STATEMENT

- 9.1 This Design and Access Statement has been prepared on behalf of the Applicant to support the planning application for full planning permission for the demolition of the existing sales building and MOT centre on site and the erection of a new sales building, 4 no. new jet wash bays, amendments to the forecourt canopy, a new bin store, a new air/water vac machine, new parking spaces, a new boundary fence, and associated works at Northumberland Park Service Station, 1-13 Willoughby Lane, London, N17 0QU.
- 9.2 The Design and Access Statement requirements of the site have evolved from an appraisal of the site's context against the background of its location, the proximity to the highway network and operational requirements.
- 9.3 In accordance with the requirements to formally state how design and access issues have been considered (under Section 61 of the Planning and Compulsory Purchase Act 2014) this document addresses the design principles and concepts that have been applied to the development in relation to location, use, layout, scale, appearance and landscaping in relation to the site's context.
- 9.4 The Design and Access Statement should be read in context with the planning application's supporting reports, drawings and accompanying material.

Site Evaluation

- 9.5 There are a number of key issues which have informed the design solution for the site's development. Effectively, it balances the site's opportunities and constraints arising from the assessment of the site to deliver a development that achieves a high quality design, is sustainable, is economically viable and enhances the established locality. The principal constraints can be identified as:
- The need to upgrade the sales building to meet the operational needs of the operator and the requirements of the customers;
 - The need to ensure appropriate levels of car parking;
 - The 'island' nature of the site, which is surrounded by residential properties;
 - The need to maintain existing access arrangements and ensure adequate circulation across the site for all users; and
 - The need to retain the recently installed EV charging bays in situ.
- 9.6 There are a number of opportunities afforded by the potential redevelopment of the site that are a relevant material consideration in evaluating the proposals. In summary these are:

- The site offers an excellent location in terms of visibility and accessibility for motorists travelling along the local highway network;
-
- The opportunity to make best use of an existing site within Northumberland Park, and a site which is located in a designated Growth Area; and
-
- The opportunity to provide an upgraded sales building which would benefit the users of the site and motorists on the road network.
-
- The opportunity to reinforce the site's role as an EVC Hub through the provision of additional EV bays.

Planning Policy

9.7 A detailed evaluation of the planning policies relevant to this planning application is provided in Section 5 of this Statement. However, in summary, the following policies are of particular relevance to the Design and Access Statement, and they form this report:

- Paragraphs 7, 8, 10, 11, 119, 126 and 130 of the National Planning Policy Framework (July 2021);
- London Plan (2021) Policies GG1, GG2, D1, D2, D3, D4 and D5; and
- Haringey Strategic Policy SPII; DMD Policies DM1, DM2, DM3, DM8 and DM21.

Design Considerations

Use

- 9.8 The site is an existing operational petrol filling station. The proposed development is to replace the sales building and MOT centre with a new and improved sales building.
- 9.9 The principle of the replacement sales building and redevelopment of the site for petrol filling station use has been established by the planning history on the site. No new use is introduced to the site.

Layout

- 9.10 Detailed consideration has been given to the layout of the site in order to ensure optimum circulation across the site, adequate provision of parking and appropriate scale and massing. This is shown on the proposed layout plan.

Scale

- 9.11 The proposed building is considered to be of an appropriate scale to meet the needs of customers and the operator.

Appearance

- 9.12 The design of the replacement sales building reflects the modern style of petrol filling stations, adopting a simple uncluttered design. The proposed sales building will be of a high quality design with inviting interiors incorporating a glazed frontage overlooking the forecourt creating a clean welcoming environment, which is modern, attractive and uncluttered.
- 9.13 The appearance of the overall building is clean, crisp and modern and entirely suitable to its petrol filling station use.

Materials

- 9.14 The development incorporates the use of modern materials typically found on petrol filling stations.

Landscaping

- 9.15 The site is urban in character and is primarily hard landscaped. This will be retained.

Accessibility

- 9.16 The Applicant is committed to a policy of equality, inclusion and accessibility for those who live and visit the site and has strived to exceed all required standards and achieve a development which promotes inclusion and accessibility.
- 9.17 The provision of an accessible and inclusive environment has been an integral theme throughout the design process from its initial conception to its current form. The concept of inclusive design seeks to remove barriers which create undue effort, separation and special treatment which enables everyone to participate equally regardless of gender, disability or age.
- 9.18 The use of the site as a petrol filling station is well established by the planning history of the site and the current access arrangements upon it. The access to the main highway network has been predetermined by the existing use on the site and the retention of the forecourt.

Community Safety

- 9.19 Consideration has been given to creating an attractive, safe environment through the development of a high quality public realm with a forecourt and parking area which is overlooked by the sales building and road network. The site layout ensures natural surveillance across the site and protects the safety of users and the wider community. Overall, the site will provide a high quality development with good community safety.

Conclusions

- 9.20 The proposal responds positively to the site's opportunities and constraints and consideration has been given to layout, scale, appearance and landscaping. Access to and within the site has been carefully reviewed. It is considered that, based on the above, an appropriate and site sensitive design solution has been found.

SECTION 10: CONCLUSIONS

- 10.1 The application seeks full planning permission for the demolition of the existing sales building and MOT centre on site and the erection of a new sales building, 4 no. new jet wash bays, amendments to the forecourt canopy, a new bin store, a new air/water vac machine, new parking spaces, a new boundary fence, and associated works at Northumberland Park Service Station, 1-13 Willoughby Lane, London, N17 0QU.
- 10.2 The National Planning Policy Framework identifies the need for planning positively for community facilities and roadside services that support the safety and welfare of road users. Petrol Stations are a vital necessity and provide an important role in ensuring that motorists travel safely especially as the number of vehicles on the roads continues to increase and the number of petrol filling stations decreases, thereby increasing demand on existing petrol stations.
- 10.3 The principle of redevelopment of the site should be accepted given that the site is an existing long-established petrol filling station and has a long planning history for the provision of roadside services. The proposals will improve and expand an existing petrol filling station to enable the site to better meet the needs of motorists, as well as local residents. The proposal will bring a range of economic benefits and accord with the role and the focus as contained within the NPPF and the Development Plan.
- 10.4 In light of the size of the development and the location of existing established facilities, retail impact is not a consideration which is material to the application. Notwithstanding this, given the small uplift in floorspace it is not considered that the application proposal will have any trade diversion or adverse impact on any designated shopping centre or other retail floorspace of acknowledged importance. Due to the scale of the proposal and its relationship to the existing site, the application of the sequential assessment is not considered to be relevant. However, the role of petrol station shop in supporting the local community as well as passing motorists.
- 10.5 Detailed consideration has been given to the layout of the site to ensure the operation of the site and traffic flows through it are optimised. Access into and out of the site remains as existing, meaning there will be no change or impact on the existing highway network.
- 10.6 The addition of further Electric Vehicle Charging on the site should be embraced as is in accordance with the Government's objectives to reduce reliance on fossil fuels and decrease CO² emissions. The provision of additional facilities is important in supporting the growth in ownership of electric vehicles.
- 10.7 Due to the layout of the proposal and the distance of the nearest neighbours, it is considered that there will be no material impact on the amenity of adjoining occupiers. The application proposal is of an appropriate design and will



provides visual amenity benefits to local residents through good design. It is therefore considered that the proposal accords with national and local policy on amenity.

- 10.8 On the basis of the above it is requested that planning permission is forthcoming for this proposal.