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PLANNING

**Land off Pwllheli Road, Caernarfon
DESIGN, ACCESS AND PLANNING STATEMENT
Beauchester Estates Limited
October 2023
2023.056**

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Design, Access and Planning Statement



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DRAFT

1. Introduction

- 1.1 This Design, Access and Planning Statement (DAPS) accompanies an application for full planning permission for the provision of a Petrol Filling Station, Electric Vehicle Hub, Retail Kiosk and Drive-thru Coffee Shop together with creation of new access onto Pwllheli Road, Caernarfon.
- 1.2 Following the enactment of the Planning (Wales) Act 2015 (the Act) the requirement for pre-application consultation on major development schemes was implemented. This includes the provision of a site area over 1ha. The proposed development exceeds the 1ha site area threshold.
- 1.3 The requirement to carry out pre-application consultation falls under Section 17 of the Act and the Town and Country Planning (Development Management Procedure) (Wales) Order 2012 (DMPWO) as amended by the 2016 Order. Guidance on carrying out the pre-application consultation requirements within the Act has been provided by the Welsh Government set out in Article 1 of the Town and Country Planning DMPWO (Amendment) 2016 'Guidance on Pre-application Consultation'.
- 1.4 This Design, Access and Planning Statement is issued as part of a suite of documents for Pre-Application Consultation prior to the submission of a formal planning application.
- 1.5 As required by the Town and Country Planning (Development Management Procedure) (Wales) Order (Amendment) 2016 the statement aims to address the following matters;
- Explain the design principles and concepts that have been applied to the development;
 - Demonstrate the steps taken to appraise the context of the development and how the design of the development takes that context into account;
 - Explain the policy or approach adopted as to access, and how policies relating to access in the development plan have been taken into account; and
 - Explain how any specific issues which might affect access to the development have been addressed.
- 1.6 The site lies 1.9 kilometres south of Caernarfon town centre and is immediately to the north of a roundabout on the A487 Caernarfon Road known as the Caernarfon and Bontnewydd Bypass which opened in February 2022

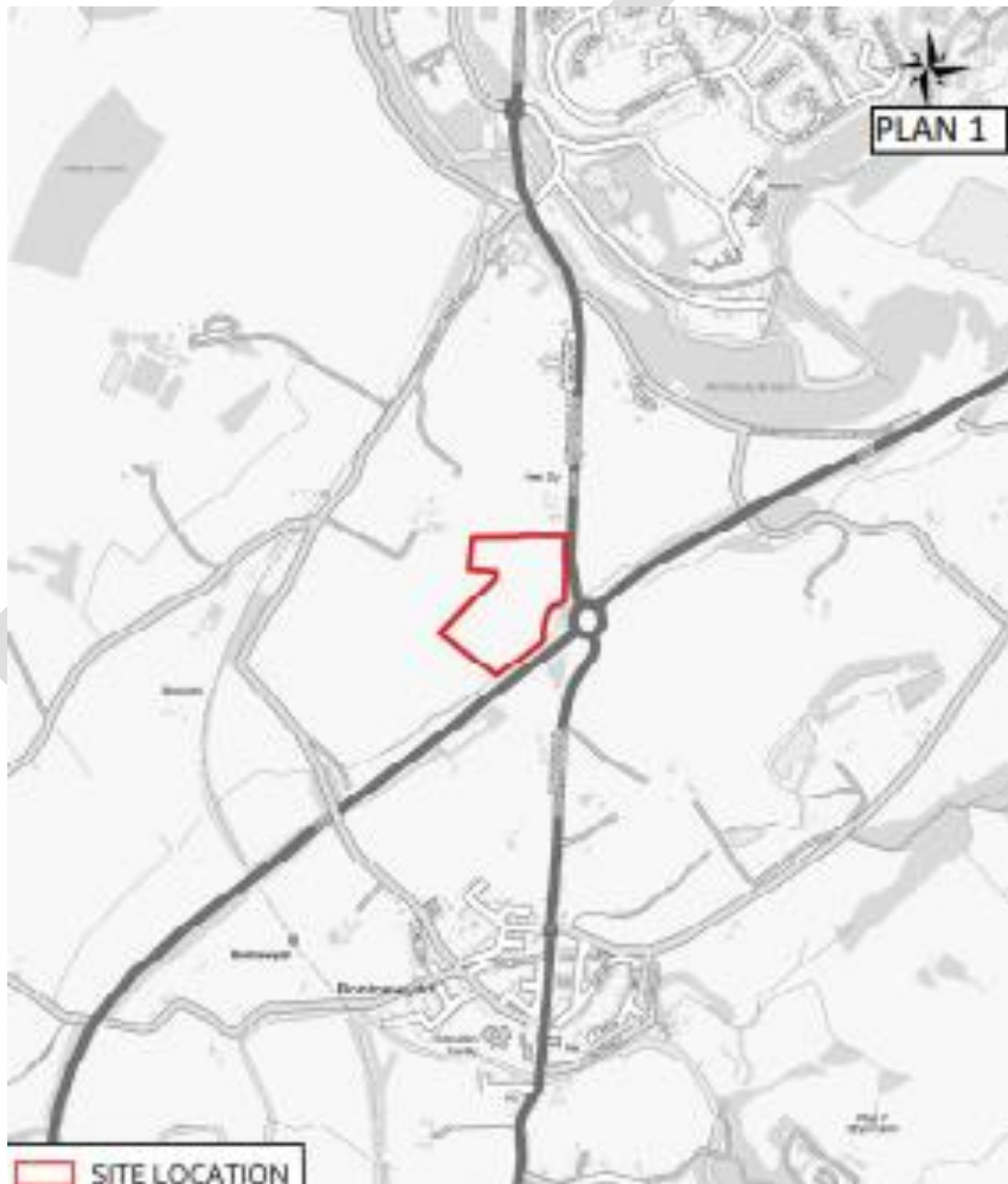
Motor Fuel Group

- 1.7 The application is submitted by developer Beauchester Estates Ltd with the intention that the Motor Fuel Group would operate the site. Motor Fuel Group (MFG) is the largest independent forecourt operator in the UK. The Company has around 900 stations operating under the BP, Shell, Esso, Texaco, JET and Murco fuel brands.
- 1.8 At Caernarfon all signage on site will be bilingual Welsh/English.
- 1.9 MFG intends 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.
- 1.10 MFG have recently launched a similar offer to that proposed at Caernarfon at St. Clears, Carmarthenshire, with a mix of conventional fuel pumps and EV ultra rapid power chargers.
- 1.11 MFG's dual-fuel strategy is to develop its infrastructure ahead of EV demand alongside its existing fuel and retail business enabling a transition to a cleaner environment. The £400m investment in EV will be funded entirely from cash generated by the existing business.
- 1.12 In partnership with others, MFG has already installed electric chargers at 108 of its sites – the highest number in the independent forecourt sector. With ultra-rapid 150kW and 350kW chargers, a vehicle that can take that charge can add 100 miles range in approximately 10 minutes.
- 1.13 MFG wants to provide a reliable and practical service for its EV customers by providing multiple ultra-rapid chargers on their forecourts.
- 1.14 For drivers who find filling up or charging a challenge, MFG has partnered with the Fuel Service app to provide customers with assistance on the forecourt. This service enables disabled drivers to ask participating service stations for help before they go, so they have the confidence of knowing someone will be available to assist them when they arrive.

2. The site and surrounding area

2.1 The site is currently greenfield land having recently been used as part of the operational area for the construction of the Caernarfon By-Pass. The site lies immediately to the north of the, now open, Caernarfon By-Pass just off a roundabout which provides the principal access into Caernarfon to the north, Bontnewydd to the south and provides links to Pwllheli and Porthamdog to the west and Bangor to the east.

Figure 1: Site location plan



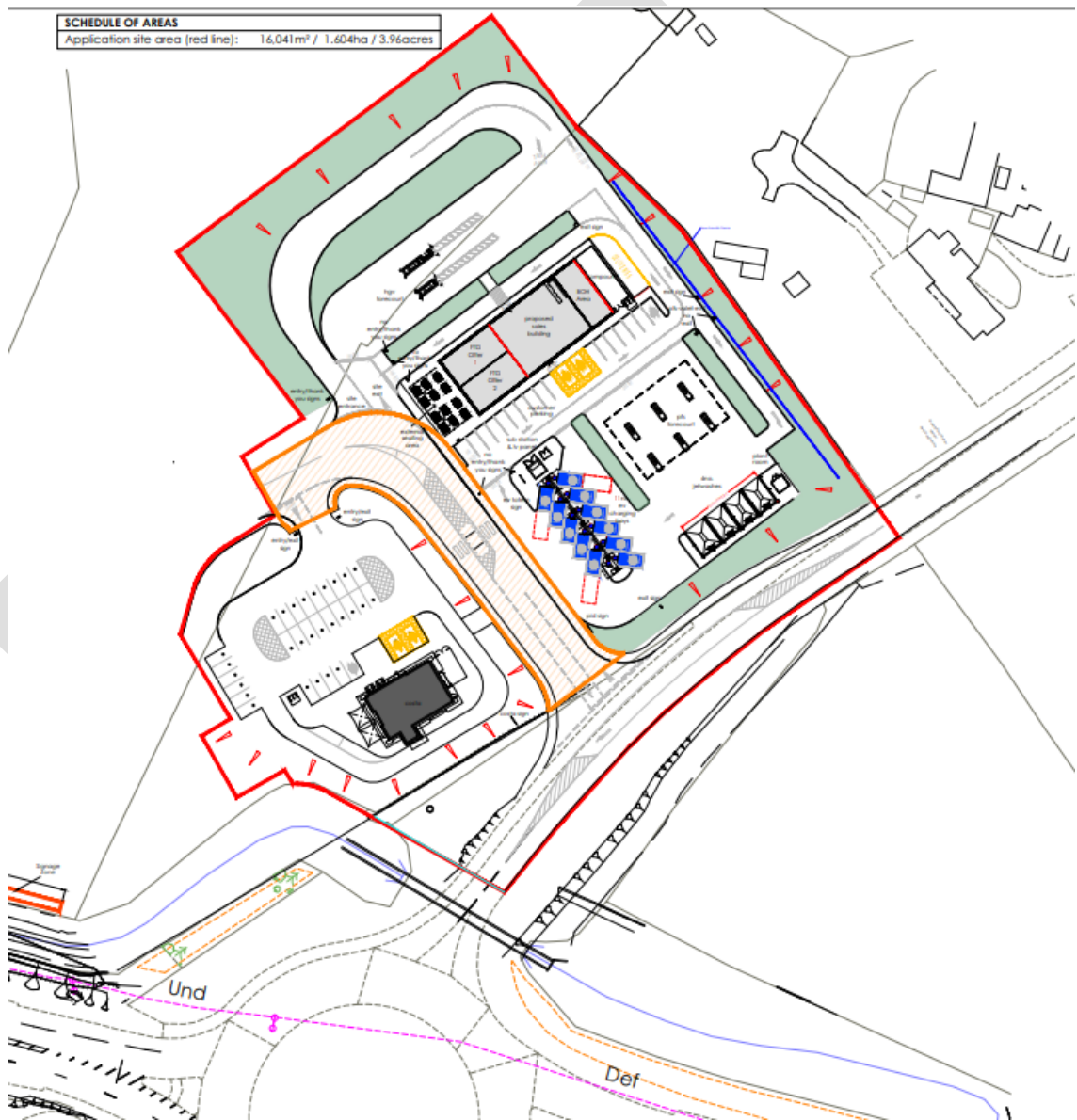
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- 2.2 Immediately to the north of the site is a six bedroom guest house with residential properties on the outskirts of Caernarfon some 300 metres to the north. Bontnewydd lies some 500-700 metres to the south. The site boundary with the guest house includes a significant screen hedge.
- 2.3 The land surrounding the roundabout junction has been landscaped as part of the by-pass scheme and will, in time be well-vegetated with mature trees and low level scrub planting. Visibility of the site from residential properties at Bontnewydd and Caernarfon is limited by the topography of the land as the site sits, close to a low level in the surrounding landscape, with the land rising to the north and south from the by-pass roundabout.
- 2.4 The site is less than 2km from the very centre of Caernarfon and is well linked to Caernarfon and Bontnewydd with pedestrian paths, many of which have been improved as part of the by-pass proposals. The site is also close to national cycle networks. Therefore the site and town centre are easily accessible.
- 2.5 The site gradually slopes upwards from the A487 Caernarfon by-pass to the south. The site area is approximately 1.6 hectares.

3. The proposal

- 3.1 The application proposes the provision of a Petrol Filling Station, Electric Vehicle Hub, Retail Kiosk and Drive-thru Coffee Shop together with creation of new access onto Pwllheli Road. The proposal includes conventional fuel pumps; HGV Fuel bays; 11 EV charging bays; 4 jet wash car bays with car parking and cycle parking; landscaping including a small outside seating area; and associated works.

Figure 2: Proposed site plan



- 3.2 The proposal comprises a new petrol filling station providing 6 pump islands with provision for 12 refuelling positions with canopy above. This is positioned centrally upon

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the site with an HGV refuelling facility to the west providing refuelling positions for two HGVs. Provision is also made for an AdBlue tank which is required by HGV diesel users.

- 3.3 To the east of the site, adjacent to Pwllheli Road four jet wash bays are proposed with a vacuum bay and air/water bay.
- 3.4 To the south of the fuel canopy and north of the new access road is an EV charging hub providing charging facilities for eleven vehicles. This facility will be covered by a canopy and also includes the supporting infrastructure, GRP enclosure and power packs along with substation. These are required to ensure that the charging points are fast enough to meet the needs of electric vehicle motorists.
- 3.5 The proposal includes the development of a sales building of 510 sqm gross (480 sqm gross internal area). The facility includes toileting for males, females and accessible facilities along with back of house storage areas and staff facilities.
- 3.6 In addition to the sales building is a compound which will provide a bin storage area along with access to the storage area of the sales building. A small part of this is covered to allow delivery cages to be unloaded in the dry.
- 3.7 The new sales building will be modern in design, creating a clean, crisp style building fit for purpose. The proposal includes a new glazed front elevation providing a light and spacious internal environment for customers and those working within it.
- 3.8 Car parking is provided to the front of the sales building, including fifteen spaces, with two disabled spaces located adjacent to the store entrance. Designated cycle and motorcycle parking is also provided on site. A small outside seating area is provided to the south of the sales building.
- 3.9 A new access into the site from Pwllheli Road is provided close to the point of an existing agricultural access as such there is no loss of trees or existing hedgerows as part of the formation of the new access and associated visibility splay.
- 3.10 The existing recent landscaping on the southern and eastern boundaries of the will be retained, though part of an existing hedge to the west will be removed. Proposed landscaping is proposed to mitigate this loss and to also deliver net gains in terms of screen planting and biodiversity. Additionally to a landscape buffer to the north an

acoustic screen fence will be provided to protect the amenity of the guest house and neighbouring properties to the north.

Role, Function and Location of Petrol Filling Stations

- 3.11 Prior to the consideration of this application, it is relevant to consider the context in which the application is submitted, both in terms of current trends within the petroleum industry and the specific reference to the role, function and location of petrol filling stations generally, as well the specific role and function of the application site.
- 3.12 The Supply of Road Fuel in the United Kingdom Market study Final Report by the Competition and Markets Authority (July 2023) found that some weakening of retail competition in the UK road fuel market, leading consumers to pay higher prices at the pumps than would otherwise have been the case.
- 3.13 There are a number of factors for this weakened competition but Experian Catalyst UK confirms that the number of petrol forecourts in the UK had fallen in 2020 to just 8,385, compared to the 1967 all-time high of 39,958 forecourts. This is representative of the downward trend of petrol filling station sites in the UK. Conversely, the number of registered UK vehicles registered in the UK is still rising. At the end of March 2023, there were 40.8 million licensed vehicles in the UK, which was a 1.1 per cent increase compared to the end of March 2022. Cars make up the majority of licensed vehicles.
- 3.14 In the United Kingdom, there were 33.27 million cars (81.5 per cent), 4.65 million LGVs (11.4 per cent), 0.54 million HGVs (1.3 per cent), 1.37 million motorcycles (3.3 per cent), 0.14 million buses & coaches (0.3 per cent) and 0.85 million other vehicles (2.1 per cent) licensed at the end of March 2023. The general picture is that the total number of licensed vehicles has increased in all but two years (1991 & 2020) since the end of the Second World War. (Vehicle Licensing Statistics: January to March 2023)
- 3.15 The effect of the above is that fewer service stations are serving more motorists. As a result those individual service stations which remain and any new facilities are becoming increasingly busier, experiencing a greater volume of visit rates and a greater throughput fuel and are thus, being made to work much more intensely, combined with the lack of competition.
- 3.16 It is self-evidence that the role and function of petrol filling stations are generally geared to serving the motorist. Depending on the location of petrol filling stations such developments have potential to intercept traffic from a wide catchment area.

- 3.17 Petrol filling stations generally offer a range of services. These include the provision of fuels, car care facility (such as washing facilities and air/water/vacuum) and sales buildings. Recently petrol stations have expanded their offer to include electric vehicle recharging facilities (see below). However, the qualitative demands on petrol filling stations are increasing. In particular, existing petrol filling stations have to accommodate a greater variety of facilities and provide a high quality offer to customers and users who are becoming increasingly demanding for enhanced facilities.
- 3.18 In this respect, new to industry petrol filling stations buck national trends which are generally seeing a decline in petrol station facilities countrywide. The proposal will meet the needs of motorists on the strategic road network and also provide a facility for the local community at a site which is accessible to Caernarfon, but not a facility which will be of a scale that will compete and draw trade from the town centre.

Background to Electric Vehicle Charging

- 3.19 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 more affordable choice for people and businesses.
- 3.20 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.
- 3.21 At the end of March 2023, there were more than 1.2 million licensed plug-in vehicles in the UK, an increase of 45% compared to the end of March 2022. There were 770,000 battery electric vehicles licensed in the UK, an increase of 58% compared to the end of March 2022. At the end of March 2023, plug-in vehicles accounted for 3.0% of all licensed road using vehicles, compared to 2.1% at the end of March 2022.
- 3.22 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.
- 3.23 There are three main types of electric vehicles; battery electric vehicles, hybrid electric vehicles and plug-in hybrid electric vehicles.

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- 3.24 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.
- 3.25 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. MFG believes 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 and these are well suited to being provided on petrol station forecourts.
- 3.26 In this case the site is ideally placed to provide a fast charging facility close to the start of well used north/south route between North Wales and Aberystwyth and Cardiff and also on a key part of the road network running east/west in North Wales, in a region and on routes where there is a clear lack of fast EV charging facilities.
- 3.27 As the UK's largest independent forecourt operator, MFG is exploring how to serve the UK's increasing numbers of electric car drivers on our forecourts and beyond. These initiatives are part of MFG's wider drive to provide more and cleaner energy solutions around the world.
- 3.28 Whilst charging electric cars at home is often the most convenient and cost effective way to recharge sometimes this option is not either convenient or available. A growing number of MFG forecourts in the UK are offering fast electric vehicle charging. This takes only around 30 minutes to fully charge and also provides electric car drivers with a shorter option to just top-up to get to their destination.
- 3.29 By installing high powered, fast chargers at MFG sites countrywide, MFG is helping electric vehicle drivers to travel long distances confidently and with ease.
- 3.30 The proposal includes the provision of eleven EV charging spaces 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, meeting the needs of customers.

4. Policy context

4.1 National and local planning policy guidance considered relevant to the principle of this development is set out in this section.

4.2 S38(6) of the Planning & Compulsory Purchase Act 2004 states that:-

'If regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise.'

National planning policy and guidance

4.3 The proposal relates to a Petrol Filling Station, Electric Vehicle Hub, Retail Kiosk and Drive-thru Coffee Shop together with creation of new access and relevant national planning policy is set out in Future Wales – the National Plan 2040 (FW) which was adopted on the 24th February 2021 and in Planning Policy Wales (Version 11) (2021) (PPW).

4.4 Future Wales – the National Plan 2040 (FW) is the national tier of the Development Plan. Policy 6 sets out a 'town centre first' approach to planning for new commercial, retail, education, health, leisure and public service facilities. In the absence of a development plan allocation, a sequential approach must be used to determine planning applications.

4.5 Planning Policy for Wales (PPW) and TAN 4 Retail and Commercial Development reflect FW and provide detailed guidance on application of the sequential test. Local planning authorities (LPA) should adopt a sequential approach when determining planning applications for retail and other complementary uses. By adopting a sequential approach the first preference should be to locate new development within a retail and commercial centre defined in the development plan hierarchy of centres. The sequential approach applies to retail and all other uses complementary to retail and commercial centres, including food and drink (A3) uses.

4.6 If a suitable site is not available within a retail and commercial centre or centres, then consideration should be given to edge of centre sites. If no such sites are suitable or available, only then should out-of-centre sites in locations that are accessible by a choice of travel modes, including active travel and public transport, be considered. Developers should demonstrate that all potential retail and commercial centre options

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and then edge-of-centre options, have been thoroughly assessed using the sequential approach before out-of-centre sites are considered. Where out of centre sites are concerned preference should be given to brownfield sites which are or will be well served by a choice of means of transport and are close to an established retail and commercial centre.

- 4.7 The application site is situated in the open countryside, approximately 1km from the Development Boundary of Caernarfon and 500 metres from the Development Boundary of Bontnewydd, as defined by the extant Gwynedd and Anglesey Joint Local Development Plan (JLDP).
- 4.8 Extant statutory development plan policy as expressed in FW and the JLDP is clear that a 'town centre first' approach should be adopted by LPA in the determination of planning applications for new retail development. That approach is supplemented by detailed guidance contained in PPW and TAN 4. Developers must justify proposals that fall outside of town centres by undertaking a Sequential Assessment (SA) that objectively considers the suitability and availability of sites to accommodate their proposed development.
- 4.9 PPW also provides guidance on the assessment of retail needs. It advises that LPA's in determining applications outside retail centres are expected to first consider whether there is a need for the additional provision (paragraph 4.3.14) and then notes that the need may be assessed in quantitative or qualitative terms (paragraph 4.3.15).
- 4.10 Paragraph 4.3.17 indicates that it will be for the LPA to determine and justify the weight to be given to any qualitative assessment. The PPW guidance is reflected in TAN 4, paragraph 6.6 indicating that qualitative need is harder to justify and proposals based on this approach should be closely scrutinised to ensure that their development does not have unintended consequences and detrimental impact on existing retail activity within retail and commercial centres; and that the overall objective of applying the qualitative need approach would be to achieve an appropriate distribution and range of sites for retail stores which meets the needs of all communities, particularly of those in rural or deprived areas where existing provision is inadequate.
- 4.11 The application submission provides no assessment of quantitative need for the proposed development, as such assessments are usually focussed on the need for additional A1 retail floorspace to accommodate convenience and comparison shopping needs.

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- 4.12 In terms of qualitative need there is very limited availability of fast and accessible EV charging points in the Caernarfon catchment and no Petrol Filling Station or 'drive-thru' coffee facility on the Caernarfon by-pass. However, notwithstanding levels of current provision, the proposed development is presented as a package of development where the elements of retail use are provided in support of a proposed EV charging station and associated facilities.
- 4.13 In this context, Policies 11 National Connectivity & 12 Regional Connectivity of FW are relevant in the support that is offered for the delivery of new EV charging infrastructure.
- 4.14 The Electric Vehicle Charging Strategy for Wales (EVCS) develops the statutory framework provided by FW. The proposed development would fall within the category of 'on-route' charging capacity which is typically provided to serve customers part-way or at the start or end of a through a journey, for example at roadside service areas where other facilities will be available.
- 4.15 The EVCS states that there are approximately 130 rapid chargers providing on-route charging at approximately 70 'on-route' locations across Wales. Provision in Wales is noted as being much more sparsely distributed than in England and that it is important to address gaps in the network to increase user confidence in the availability of charging facilities on long distance journeys.
- 4.16 The strategy also notes that Gwynedd is a County with higher charging demand (2020) and that in Gwynedd the predicted demand for 'rapid' and 'fast' chargers by 2025 will be a required 60 fast and 190 rapid chargers. By 2030 the requirement will be for 115 fast and 210 rapid chargers.
- 4.17 Current EV charging facilities within the Caernarfon area are limited, comprising small numbers of chargers situated in supermarket, or public car parks. There is no 'on-route' type EV charging facility within the area. The proposed development will meet an immediate and growing need for fast and rapid charging facilities in the locality, which would benefit local residents, as well as 'on-route' traffic visiting for business and leisure/tourism purposes.
- 4.18 Given the advice within FW and the National guidance referred to above significant weight should be given to the policy framework provided by FW (Policies 11 and 12) and the EVCS insofar as the set out the need for substantial new provision in EV charging provision nationally and in Gwynedd; and the absence of such provision on a key strategic road in the County.

Local planning policy and guidance

4.19 In terms of the local development plan, the Anglesey and Gwynedd Joint Local Development Plan (JLDP) (2017) is the adopted plan. The following policies apply;

- ISA 1 Infrastructure provision
- PCYFF 1: Development boundaries
- PCYFF 2 Development criteria
- PCYFF 3: Design and place shaping
- PCYFF 4: Design and landscaping
- MAN 1: Proposed Town Centre Developments
- MAN 6: Retailing in the Countryside
- PS 5: Sustainable development
- PS 6: Alleviating and adapting to the effects of climate change
- TRA 4: Managing transport impacts
- AMG 5: Local biodiversity conservation
- PS1 13: Providing opportunities for a prosperous economy
- PS 1: Welsh Language and Culture
- PCYFF 6: Water Conservation
- Supplementary Planning Guidance (SPG): Maintaining and Creating Distinctive and Sustainable Communities

5. Main considerations

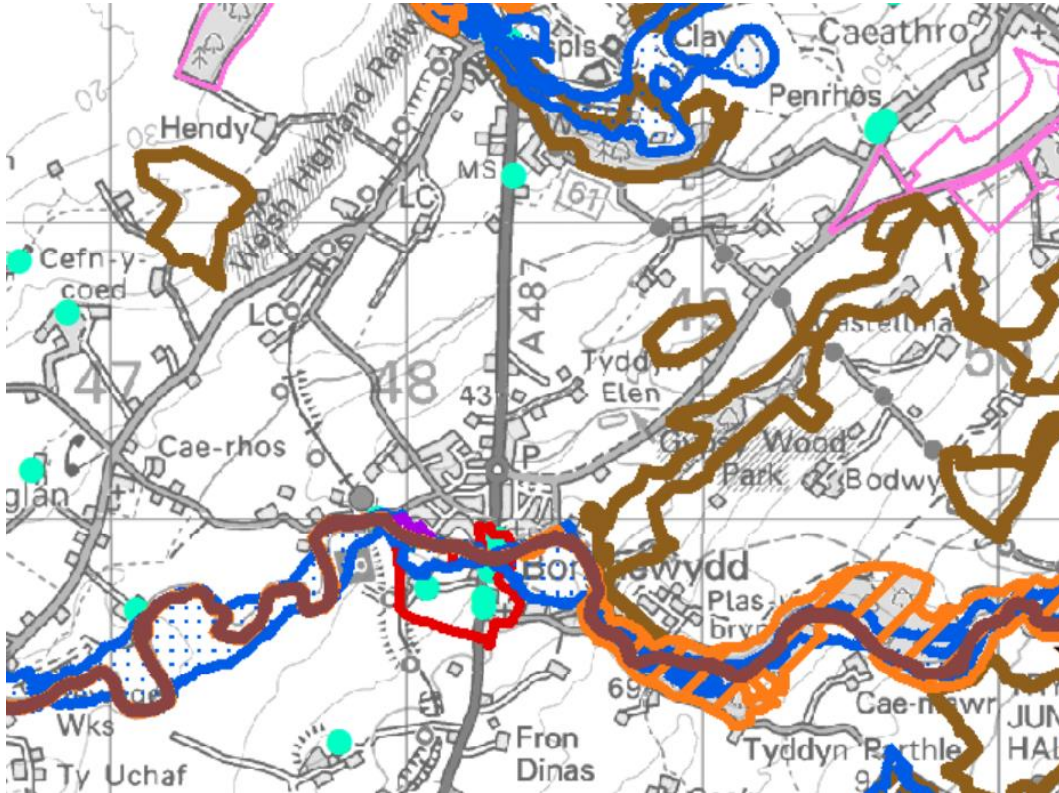
- 5.1 This section aims to explain how the proposal meets the objectives of good design as set out in PPW and TAN 12 as well as policies in the development plan including FW and the Local Development Plan (JLDP). This section will cover the following topics;
- Principle of development
 - Character;
 - Access
 - Movement
 - Environmental Sustainability, and
 - Community Safety

Principle of development

- 5.2 The proposed development includes a petrol filling station; EV charging hub; car wash and valeting area, including a small retail facility and a drive-thru coffee shop. By its nature the proposal in serving passing traffic on the Caernarfon by-pass and linked roads, requires a location which is immediately alongside the strategic road network. As such a location outside a defined Development Boundary as drawn in the JLDP is required with access available off the by-pass.
- 5.3 As indicated above the proposal is for a petrol filling station and EV charging hub with the primary purpose to provide a service for travellers on the strategic highway network. The principle of providing motorist service facilities in out of centre locations or on sites outside Development Boundaries has been established through their unique operational needs.
- 5.4 Given the location of Caernarfon town centre and Bontnewydd in relation to the A487 Caernarfon by-pass there are no sequentially preferable locations which would meet the motorists' needs without requiring motorists to travel through the urban and residential areas of Caernarfon and Bontnewydd which would be undesirable and unacceptable. The positioning of the petrol filling station and EV charging hub on the site proposed best meets the needs of motorists, whilst also providing a facility for the local community.
- 5.5 The application has however taken into consideration key policy issues at design stage. The site lies outside any flood risk zone, it lies outside any designated protected

landscape and is not within the setting of any listed building or conservation area. The adopted JLDP Constraints Map shows the site as unconstrained.

Figure 3: JLDP Constraints Map



Need

- 5.6 There is an acknowledged national requirement of “need” for additional petrol filling station facilities across the Wales and Gwynedd is no different in this respect.
- 5.7 Evidence detailed earlier within this statement demonstrates the need to protect petrol filling stations from further closure and suggests the need to embrace the opportunity to open new facilities or investment in existing facilities. Evidence shows that there are now fewer people selling fuel to motorists than any time since 1912. Motorists are noticing gaps in availability and the Petrol Retailers Association has stated that the situation is becoming acute. Petrol stations are considered as being at the hub of a community under threat.
- 5.8 Given the significant year-on-year decline of petrol stations and the year-on-year increase in registered cars on the road it is to be expected that existing petrol filling

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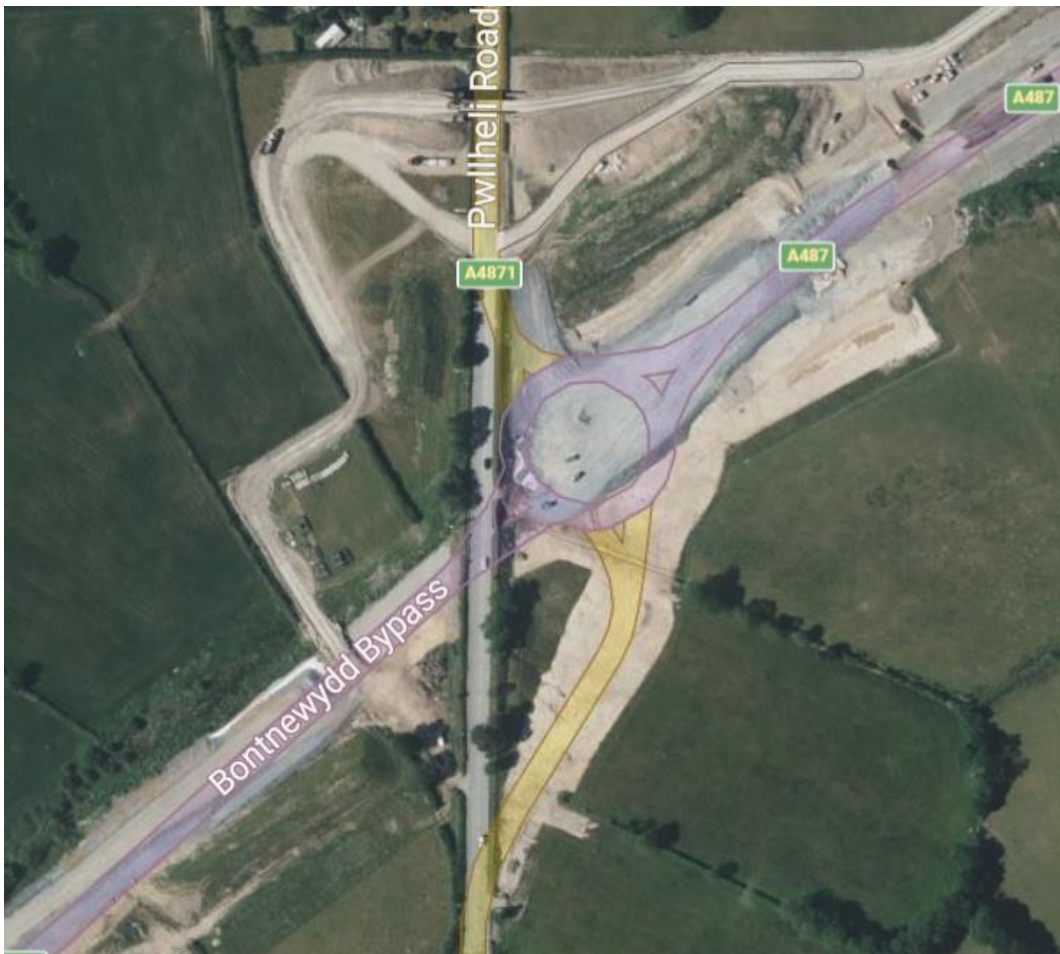
stations now have the highest ever level of average throughput. Given the important role petrol stations can play as community facilities, the loss of such sites is undesirable and investment in existing and new facilities should be embraced.

- 7.19 Earlier in the 2000's it was estimated that 150-200 sites a year were closing and whilst this 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, put those remaining petrol stations under intense pressure.
- 7.20 Given the general trend and declining numbers of petrol stations set against the increasing number of cars on the road, the opportunity to offer a new petrol filling station to meet a local need should be embraced. This is particularly the case, when the proposal for the Caernarfon by-pass site also embraces rapid/fast EV charging facilities as an integral part of the comprehensive proposal.
- 5.9 The proposal is therefore considered to accord with the objectives of FW and PPW which seeks a prosperous Wales and to ensure that economic needs are met as well as supporting communities.
- 5.10 The proposals also delivers one of the key requirements of the Electric Vehicle Charging Strategy for Wales. The JLDP is silent on EV charging sites and proposals, as such the need for the proposal should be assessed against the more up to date FW; PPW and the EVCS for Wales.

Character

- 5.11 Policy PCYFF 4: Design and Landscaping of the JLDP states that 'All proposals should integrate into their surroundings. Proposals that fail to show (in a manner appropriate to the nature, scale and location of the proposed development) how landscaping has been considered from the outset as part of the design proposal will be refused'.
- 5.12 Consideration should be given to the fact that the majority of the site was used as a working area for the construction of the Caernarfon by-pass as indicated in the image below. The proposed development extends to the west of the extent of the working area for the by-pass and crosses the line of an existing hedgerow. However, mitigation and enhancement in terms of landscape and biodiversity will be designed into the proposal to ensure that landscape impact is negligible.

Figure 4: Aerial image of site during road construction



- 5.13 The site lies outside any designated landscape, and a thorough review of the Special Landscape Areas as part of the JLDP found that there were no reasons to identify any landscape constraints. The proposal needs some visibility from the by-pass to serve the need for the proposal. However, due to the topography of the surrounding land the site can be well screened from wider views and from nearby residential properties. The site can accommodate the proposal, with additional landscaping without appearing incongruous or prominent in the wider landscape and it is considered that the development therefore complies with the policy objectives of policy PCYFF4.
- 5.14 The design of the proposed development takes account of its location outside a defined Development Boundary and on the lower level of surrounding topography by incorporating low level single storey buildings with living/green roofs or PV panelled roofs as indicated in the image below:

Figure 5: Image of proposed development



Access

- 5.15 The relevant national policies and guidance relating to accessibility are set out within:
- Planning Policy Wales, Edition 11, 2021; and
 - Technical Advice Note 18 'Transport' (2007).
- 5.16 The relevant planning policies within the adopted JLDP are as follows:
- Strategic policy PS4 'Sustainable Transport, Development and Accessibility';
 - Policy TRA 2 'Parking Standards'; and
 - Policy TRA 4 'Managing Transport Impacts'
- 5.17 It is considered that access to the site would be predominantly by vehicles, especially during the construction and management phases. However, access to the site can be gained by public transport and by foot, and cycle with the nearest bus stop located some 400m from the site. The site is therefore considered to be suitably accessible by more than one means of travel.
- 5.18 A Transport Statement is submitted with the application and the Statement has considered the traffic and transportation issues relating to the proposals for the

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redevelopment of land off the A4871 Pwllheli Road in Caernarfon for a proposed petrol filling station, electric vehicle hub, retail kiosk and drive-thru coffee shop.

5.19 The following conclusions have been drawn with regard to the proposed development:

- The existing pedestrian infrastructure located in the vicinity of the site will enable safe pedestrian movement between the development site and the residential areas located within the surrounding areas of Caernarfon.
- The site can be accessed in a safe and efficient manner.
- The parking provision within the site and the surrounding highway network will have sufficient capacity to accommodate the demand generated by the proposed development.
- The proposals will not result in a severe impact on the operation of the local highway network.

5.20 Based on the above there are no material reasons why the proposed development should not be granted planning consent on highways or transportation grounds. It is considered that the development can provide a safe and suitable access for the site. Therefore overall the development is considered to be consistent with the objectives of Policy PS4 'Sustainable transport, development and accessibility'.

Movement

5.21 The Transport Statement addresses movement to and from the site and also considers movement and accessibility by modes other than the motor car as it is important to create a choice of direct, safe, and attractive routes between where people live and where they need to travel in their day-to-day life.

5.22 The following conclusions can be drawn from the Transport Statement in terms of movement.

- The site is accessible on foot with the proposed footway provision linking with the existing provision which gives local employees and customers a choice about how they travel.
- The site is accessible by cycle with the Caernarfon and the surrounding areas within a cycling distance of the application site.

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- The services from the bus stops on the A4871 Pwllheli Road connect the site to the surrounding areas of Caernarfon. It can be concluded that the proposed development can be safely and conveniently accessed by bus.
- 5.23 In light of the above, it is considered the site is accessible by non-car modes and will cater for needs of the development's employees and assist in promoting a choice of travel modes other than the private car.
- 5.24 Within the site there are safe pedestrian routes from fuelling and EV charging areas to the buildings and also a small outside seating area providing a safe area to wait for car charges to complete their charging cycle.
- 5.25 Overall, it is considered the development would comply with the objectives of Policy TRA 4 'Managing Transport Impacts' of the JLDP.

Environmental sustainability

- 5.26 In terms of environmental sustainability, consideration has been given to the effect of the proposed development on the environment.
- 5.27 The primary objective of FW and PPW is to ensure that the planning system contributes towards the delivery of sustainable development and improves the social, economic, environmental and cultural well-being of Wales. As such, a planning system is fundamental for sustainable development and achieving sustainable places. Whilst limited reference is made to low carbon vehicles, the objective of reducing CO₂ emissions is acknowledged in various parts of the guidance. This has now been reinforced by the ECVS Wales.
- 5.28 Similarly, within the Development Plan sustainability is a key objective running throughout the policies in relation to many different land uses and design. Whilst reference to electric vehicles and the provision of charging facilities is not referenced within the JLDP, it is clear at all levels that the planning system should support the transition to a low carbon future and support renewable and low carbon energy and associated infrastructure.
- 5.29 There is no doubt that the Replacement LDP which is at the very early stages of its production will include a number of policies specifically referring to electric vehicle charging including reflecting the increasing importance of electric vehicles and their impact on achieving our Carbon reduction and Net Zero target.

Design, Access and Planning Statement

- 5.30 As explained elsewhere in the report, 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 Statement, 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.
- 5.31 Whilst the number of electric vehicles within the UK is relatively few at the current time, a lack of (or perceived lack) of infrastructure is seen as a major constraint, there are significant environmental benefits to electric vehicles in environmental terms.
- 5.32 Whilst the JLDP lacks specific policies in respect of electric vehicles, many of the policies refer to mitigating and adapting to climate change and reducing carbon dioxide emissions, and the emerging policy specifically supports electric vehicle provision. Therefore, it is considered that the proposal complies with the aims of sustainable development policies, as electric vehicles and associated infrastructure support these objectives. This is, therefore, a material consideration weighing heavily in favour of the development.

Community safety

- 5.33 Consideration has been given to creating an attractive safe environment through the development of a high quality area within the site which is overlooked by the proposed buildings. The proposed site arrangement ensures natural surveillance across the whole site and protects the safety of users of the site and wider community.

6. Conclusion

- 6.1 This Draft Design Access and Planning Statement (DAPS) accompanies a full planning application for the provision of a Petrol Filling Station, Electric Vehicle Hub, Retail Kiosk and Drive-thru Coffee Shop together with creation of new access onto Pwllheli Road, Caernarfon.
- 6.2 The DAPS has sought to explain how the proposal meets the overall principles set out within Future Wales; Planning Policy Wales and the Electric Vehicle Charging Strategy for Wales together with the objectives of good design as set out in PPW and TAN 12 as well as policies in the Local Development Plan (JLDP).
- 6.3 Since the construction of the Caernarfon by-pass it is clear that there are now no convenient re-fuelling or EV charging facilities available in a convenient location off the main north/south strategic highway route in Wales with the nearest Services offering odd-road fuelling and limited EV charging off the A55 at Bangor with only very limited facilities to the south.
- 6.4 The proposal can deliver the significant charging infrastructure required by the EVCS Wales but only as part of a comprehensive proposal which also caters for the need for conventional fuel for cars and HGV's together with associated rest and refreshment facilities as one comprehensive proposal.
- 6.5 The proposal is accessible by all means of transport including walking; cycling and by bus, and provides new employment opportunities for at least 30 local persons. The proposal can therefore deliver a means of reducing our CO2 emissions and also deliver wider economic benefits. Although located outside the current Development Boundary of Caernarfon and Bontnewydd, the site, when operation can also incorporate facilities to signpost users towards the attractions and local businesses in Caernarfon Town.
- 6.6 The design of the proposal has taken into account policy issues and overall it is considered that the DAPS as submitted is sufficient to support this application.

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