

Proposed mixed-use development at 104A Finchley Road NW3 5EY
LBC ref: 2022/3553/P
Note on proposed loss of petrol filling station [PFS]
27 October 2022

Introduction

The transport officer has made the following comment regarding closure of the PFS (see email from case officer 28.9.22):

The FSA [Fuel Station Analysis] document does not address the fundamental issue raised in Chapter 10 of the CPG: a thorough examination of the impact on the road network and vehicle miles travelled to be carried out. The pre-app observations recommended carrying out a questionnaire surveys of PFSs to ascertain customers' diversion behaviour in the event of should their petrol filling station being closed. We do not have any surveys of the PFS although TRICS analysis suggests there would be around 1,140 visits per day. Please provide further information.

This note provides a response and further information accordingly.

Background

Section 10 of CPG Transport notes that the Site is one of four PFS in the Borough. It goes on to state:

10.2 The Council strongly supports car-free development and our Transport Strategy aims to reduce car use and ownership throughout the borough. However, we recognise that existing petrol stations serve essential car users and may have a role in supporting the transition from petrol and diesel vehicles to low emission vehicles (e.g. electric) and automated vehicles. Where there is a proposal to redevelop an existing petrol filling station, the Council will expect the impact on the road network (e.g. vehicle miles travelled) and the Borough's residents to be thoroughly examined. This should include considering the number of visits to an existing petrol station as well as mapping of alternative facilities, including any supermarkets that supply petrol.

The submitted Hampstead Fuel Station Analysis (Alexander James) notes that there has been a 24.1% reduction in overall fuel sales between year/end 2016 and year/end 2022. This is against a background growth of 4.8% across all UK PFS sites. The Analysis notes that this particular site has limited scope for expanding its store or accommodating multiple fuelling types (eg EV), while at the same time experiencing a swifter decline in traditional fuel sales with the advent of the ULEZ and its proposed expansion to the whole of London next year.

The Analysis goes on to examine alternative PFS facilities and notes the convenience of the nearby Wellington Road BP site in St John's Wood and its more generous layout. There are ample nearby PFS facilities on major routes and there is no suggestion that additional vehicle miles will result from motorists seeking to purchase fuel. Indeed, the submitted Transport Statement notes that:

It is widely accepted that vehicle trips to petrol stations are largely a result of people 'passing by' the PFS and stopping to purchase fuel before continuing their journey. A PFS generates low levels of 'primary trips', which are trips with the sole purpose of only visiting the PFS. [para 5.8]

The Analysis concludes:

Taking into account the number of alternative re-fuelling stations and their relative proximity and capacities, in my opinion there will be sufficient available alternative re-fuelling options for ICE [internal combustion engine] vehicle drivers, particularly when factoring in the likelihood of further decreased demand for traditional fuels over the next two to three years ...

Fuel sales

Appendix 1 provides data on fuel sale transactions at the site for 6 sample weeks during 2022.

On average there were some 368 fuel transactions each day during these sample weeks.

The range of transactions was between 313 (Sunday 5 June 2022) and 435 (Thursday 28 July 2022), but on average there was relatively little variation across the week.

TRICS data

The TRICS database does not contain a significant amount of trip rate data from London-based PFS. The two PFS sites referenced in the submitted Transport Statement are the best available. These sites were surveyed in 2012 and 2014, well before the ULEZ was introduced, and in outer London (Romford and Hounslow).

The trip rates used (1,140/day) are likely to be higher than would be expected for PFSs in Inner London and since the ULEZ was introduced, and indeed more generally since the announcements that the sale of diesel/petrol powered cars will be banned in the UK from 2030.

This is borne out by the fuel sales data above: the average daily flows amount to just 32% of the TRICS flows referenced in the Transport Statement.

Traffic flows

Appendix 2 provides traffic count data for Finchley Road (A41), collected and held by the DfT. Manual Count Point 16434 is around 500m north of the application site on Finchley Road and is likely to be closely representative of the volume of traffic passing the site.

The most recent manual count was undertaken in 2021, and the stated total two-way Average Annual Daily Flow (AADF) of all motor vehicles was 40,618. Roughly 50% of these traffic movements would be heading south past the site.

The average 368 fuel-related visits to the PFS represent just 1.8% of these southerly flows.

It is interesting to note also the significant decline in observed traffic volumes on the A41 from a peak of 58,053 total two-way AADF in 2009 (-30%). This is again reflective of the ULEZ and changing drive habits over the past 13 years.

The data from 2019 demonstrates the pre-pandemic baseline (42,988 vehicles/day).

Alternative facilities

The FSA maps the nearest alternative PFS and considers whether they are likely to be impacted by closure of the PFS on the application site. Importantly, the temporary (and potentially permanent) closure of the Morrison's Chalk Farm PFS does not appear to have resulted in additional fuel sales at Finchley Road. And the closest alternative (Wellington Road BP) is a larger site with greater capacity.

Three of the PFS sites (Wellington Road, Kilburn High Road and Sutherland Avenue) are monitored for pricing differentials to which sales volumes are sensitive (especially in present market conditions). Such differentials have a greater impact on customer behaviour than would the loss of the PFS on this site.

Commentary and conclusions

The application has thoroughly considered the relevant tests set out in CPG.

The submitted Transport Statement utilised TRICS data to show that the removal of the PFS would not have any adverse impact on the local highway

network. The fuel sales data demonstrates that actual trips associated with the PFS are much lower (32% of the TRICS). They are also just 1.8% of southerly traffic flows on Finchley Road. The reassignment of these trips on the network will therefore have minimal impact on highway conditions.

The submitted Fuel Station Analysis mapped alternative PFS facilities, including foodstores. There is ample provision for fuel purchase elsewhere in the area and along the Finchley Road. The closure of the Chalk Farm Morrisons' PFS has not been seen in the fuel sales data for the Finchley Road site either.

We noted the suggestion at pre-application stage that a survey be used to assess customers' potential alternative fuel purchase behaviour. Our considered view, however, was that this would not yield meaningful data and would likely impact adversely on already weak sales. As noted above, price differentials have an arguably greater impact on customer behaviour than location.

It is important to note also that the fact of a car-free proposal complies with the policy requirement set out in CLP Policy T2. By contrast, the requirements of CPG are guidance only and do not have the status of policy.

Mike Ibbott
tpb/27 October 2022