

Our Ref: Shinfield SS

Your Ref:

Planning Department
Wokingham Borough Council
Civic Offices
Shute End
Wokingham
RG40 1BN

20 May 2022

Dear Sir/ Madam

MFG Shinfield Service Station, 211 Shinfield Road, Reading RG2 8HA

This letter comprises a Planning Statement on behalf of our Clients, the Motor Fuel Group (MFG), in support of a planning application submitted by MBH Design Studio Ltd for Installation of 8 Electric Vehicle (EV) bays and associated infrastructure at the Shinfield Service Station site on the A327 Shinfield Road. The site is largely within Wokingham Borough Council jurisdiction; however the south eastern corner is within Reading Borough Council jurisdiction. As most of the site and its access are within Wokingham's area, the application is being submitted to Wokingham Borough Council. We assume that Reading Borough Council will be consulted on the application.

This letter should be read in conjunction with all the application documents, including the proposed application drawings.

This Planning Statement describes the site and surrounding area, sets out the proposal, relevant planning history, relevant national and local planning policies and guidance and assesses the impact of the proposal. It concludes that the application should be approved.

The Site and Surroundings

The site is located directly adjacent to the A327 Shinfield Road, on the southbound side, between the M4 and Reading. It is self-contained. The site is bounded by commercial buildings to the north and south, residential to the east and the A327 Shinfield Road to the west.

The site already has a petrol service station including a shop, canopy and a car wash.

There are no heritage assets on the site and no listed buildings within 500m of the site boundary.

The site lies in an area which according to the Environment Agency is indicated as Flood Zone 1.

The Proposal

The proposal is for the installation of 8 Electric Vehicle chargers and associated infrastructure. Also, a new substation is proposed to enable the additional electricity output. There is already a gas sub-station on the site. The new items are proposed in the north-eastern corner of the site, over existing parking spaces.

Parking will still be possible along the northern boundary of the site.

The proposal would provide new electric vehicle charging facilities to the area, which is becoming more commonplace around the country to meet the increasing number of electric vehicles on the road and, therefore, their need for more and bigger charging facilities.

The proposed electric vehicle infrastructure includes eight Alpitronic chargers, eight charging bays and a substation.

Relevant Planning History

There have been several planning applications over the years for development of the existing service station, which has been on the site for many years. The most relevant are set out below.

Planning permission was granted in 2004 for the 'Proposed demolition of existing service station building and canopy and erection of replacement sales building and canopy.'

Approval was given for signage in 2015 and subsequently for installation of an ATM in 2016.

This is the first application for EV charging points on the site.

Relevant Planning Policy

The national level of policy is contained within the National Planning Policy Framework (NPPF, 2021).

The most relevant paragraphs from the NPPF are:

8 Achieving sustainable development – Economic and Environmental objectives

- 10/11 Presumption in favour of sustainable development. 'Approving development proposals that accord with an up-to-date development plan without delay.'
- 38 Encourages Local Planning Authorities to approach decisions in 'a positive and creative way'. 'Decision-makers at every level should seek to approve applications for sustainable development where possible.'
- 104 Promotes sustainable transport
- 107 'The need to ensure an adequate provision of spaces for charging plug-in and other ultra-low emission vehicles.'
- 112 'applications should be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.'
- 152-158 Planning for climate change

These paragraphs of the NPPF clearly provide a strong presumption in favour of the proposed development and support the proposals in this application.

Government Announcements

In addition to the above national policy support for the proposal, the provision of green infrastructure is being actively encouraged by the Government, who made an 'announcement' on 18th November 2020, including a ten-point plan for a green industrial revolution which will create and support up to 250,000 jobs. This Government initiative will help the UK to achieve its ambition of becoming net zero by 2050. The plan is being supported by £12 billion of government investment and aims to spur over three times as much private sector investment by 2030. The UK's industrial heartlands, including the North-East, Yorkshire and the Humber, West Midlands, Scotland and Wales, are described as being at the "centre of the blueprint."

The ten-point plan includes the following:

'Electric vehicles: Backing our world-leading car manufacturing bases including in the West Midlands, North-East and North Wales to accelerate the transition to electric vehicles, and transforming our national infrastructure to better support electric vehicles.'

The Prime Minister has confirmed that the UK will end the sale of new petrol and diesel cars and vans by 2030, ten years earlier than planned. However, it will allow the sale of hybrid cars and vans that can drive a significant distance with no carbon coming out of the tailpipe until 2035.

'Carbon capture: Becoming a world-leader in technology to capture and store harmful emissions away from the atmosphere, with a target to remove 10MT of carbon dioxide by 2030, equivalent to all emissions of the industrial Humber today.'

To support this acceleration, the Prime Minister announced:

- **'£1.3 billion to accelerate the rollout of charge points for electric vehicles** in homes, streets and on motorways across England, so people can more easily and conveniently charge their cars.
- **£582 million in grants for those buying zero or ultra-low emission vehicles** to make them cheaper to buy and incentivise more people to make the transition.
- **Nearly £500 million to be spent in the next four years for the development and mass-scale production of electric vehicle batteries**, as part of our commitment to provide up to £1 billion, boosting international investment into our strong manufacturing bases including in the Midlands and North-East.
- **A consultation will be launched on the phase out of new diesel HGVs'**

More recently the Government announced changes to the funding for zero-emission vehicles. Published on 15th December 2021, Government analysis shows sales of zero-emission cars are up 89% compared to 2020 and new rules are set to be introduced [in 2022] to improve reliability and make it easier to pay at public charge points.

The above rule changes and financial support tools are designed to make it as easy as possible for people to switch to an electric vehicle and ensure drivers have confidence in the charging infrastructure.

The above evidence strongly supports approval of this application.

Wokingham Development Plan

The Development Plan comprises of:

- Wokingham Borough Council Core Strategy 2010,
- Supplementary Planning Documents,

Relevant Local Plan Policies

Core Strategy 2010

- CP1 – Sustainable Development
- CP6 – Managing Travel Demand,

The above policies support the proposed development with references to:

‘minimise the emission of pollutants into the wider environment’, ‘minimise the consumption and use of resources...’, ‘including on-site renewable energy features’, minimising energy and water consumption...’ (CP1), and

‘Planning permission will be granted for schemes that: Provide for sustainable forms of transport to allow choice.’ (CP6)

Adopted Managing Development Delivery Local Plan 2014

- CC01 – Presumption in Favour of Sustainable Development
- CC05 – Renewable energy and decentralised energy networks

The above policy documents are not up to date in respect of need for infrastructure to support EV charging hubs, but there is significant support for reducing pollution and energy consumption.

Work is underway on a new local plan which will shape the future of Wokingham Borough.

This new local plan will guide where and how growth will take place in the borough in the years up to 2038.

There are no relevant Supplementary Planning Documents.

The site falls within the boundary of the Shinfield Parish Neighbourhood Plan 2017 area. The proposals do not conflict with any policies in the Plan. The proposals comply with Policy 11: Commercial Development.

As the site partially falls within Reading Borough Council’s boundary, we have assessed the policies in the Reading Development Plan also below.

Reading Local Plan

The Development Plan comprises of:

- Reading Borough Local Plan – adopted Nov 2019;

Relevant Local Plan Policies

CC1 – Presumption in Favour of Sustainable Development

CC2 – Sustainable Design and Construction

The above policy context supports the proposed development subject to no significant adverse impacts on normal development management issues, which are dealt with below.

Principle of Development

The proposed development is supported by and will contribute to delivery of the Core Strategy and Managing Development Delivery as set out above.

The proposal is solely for EV charging hub (EVCH) infrastructure. The service station is focused on delivering services to traffic travelling along the A327, Shinfield Road. It is important that such locations provide EVCH options.

There are no environmental or heritage constraints which apply to this proposal. The requirement to make the best use of brownfield, previously developed sites supports the proposed development on this site. The proposed scheme is in accordance with the policies referred to above.

Policy CP1 and CC01 apply the presumption in favour of sustainable development, which should apply to this proposal.

There are no specific infrastructure requirements to support the development off-site. On-site a sub-station will be required and is proposed.

The proposed electric charging points will serve the increasing housing provision in the area and would be part of the wider infrastructure necessary to support this.

The site lies within the urban area, forming part of the strategic travel road network rather than forming an isolated countryside location.

It is clear from the above that the Council agree that electric vehicles constitute sustainable travel to help respond to climate change.

Whilst the Council is seeking to ensure that new developments have electric vehicle charging points, this does not address the existing housing and business market, many of which do not have on plot parking spaces and therefore would be unable to run cables across pavements, into car parks etc. These much more numerous vehicles will continue to have to rely on the type of infrastructure being proposed under this submission.

Given the above, there is strong Government and Local Plan policy support for the principle of the use of this site for new EV charging points.

The Council should therefore apply a positive presumption in favour of this application, to ensure EV charging points are supplied in the area, as they form the necessary future infrastructure to enable the step change in vehicle habits to occur.

Flooding

The site lies within Flood Zone 1. As such there are no specific specialist requirements to mitigate against flooding on site or alleviate flooding off-site as a result of the proposal.

No harm therefore arises in relation to the issue of flooding.

Sustainable Transport & Parking

Policy CP6 seeks to encourage sustainable transport choices for a wider choice of modes of transport. The policy supports developments such as this which seek to expand the support network for electric vehicles. It will contribute to reducing adverse environmental issues such as air pollution. It will also help climate change resistance.

There will be no transport impacts of the development as the journeys associated with cars coming to the petrol station for fuel will gradually be replaced by vehicles seeking charging points. The requirements of Policy TA5 on this are therefore also met.

The introduction of electric vehicle charging points within the petrol filling station will encourage economic resilience, particularly if there are further fuel shortages. It will also enhance the area as a business location. This will help in delivering economic prosperity and therefore accords with the Local Plan Vision for the area.

The proposed EV bays and sub-station will not have any adverse impact upon highway safety, being set well away from the access point to the site. They replace existing parking spaces, but there is sufficient space on the northern boundary of the site to accommodate parking. Sufficient vehicle parking will therefore remain within the site.

Ecology and Biodiversity

In terms of ecology and biodiversity, the proposed development will not have a material impact on ecology. The charging points are set to be on the existing hardstanding.

As a well-lit 24-hour petrol fuelling facility on a main strategic road network, there is no suitable habitat for protected species on or near to the site which requires replacement or enhancement as a result of the application proposals. The scheme therefore accords with policy.

Visual & Neighbouring Amenity

The proposal will have a neutral impact on the visual amenity of the area. The proposals are all appropriate to their setting and will be read in the context of the commercial nature of the site and adjoining highway.

The EVCH and sub-station is proposed where an existing gas facility exists. The proposals will be quiet and non-intrusive in relation to residential properties to the west of the site.

Conclusion

The proposed development is part of a national programme by the Motor Fuel Group to provide more electric vehicle charging hubs and points to encourage more electric vehicle use. This proposal aligns fully with Government announcements including their ten-point plan for a green industrial revolution, which involves the rapid expansion of green infrastructure and electric vehicle charging sites/ points. This proposal will contribute positively to that provision and should be fully supported.

The proposal will, for all the above reasons, have no materially adverse policy or actual impacts in terms of amenity, access and parking. There is significant local and national policy support for the proposed development which will deliver a positive contribution to the economy and the environment as referred to in this Planning Statement.

The proposal has been designed and laid out in accordance with local policy requirements and aligns with all relevant policy requirements. As a result, we respectfully request that the application be approved.

Yours faithfully,



Andy Stallan
Planning Director
Tetra Tech Limited