

DELEGATED APPLICATION REPORT

Ward: Whitley Ward

App Ref: PL/25/0282 Full planning permission

Address: READING GATE RETAIL PARK, READING, RG2 0QG

Proposal: Provision of Electric Vehicle Charging Bays, Associated Infrastructure and Associated Works

Applicant: Swarco Smart Charging Ltd

Received date: 21/02/2025

Target Decision date: 27/06/2025 (EXT)

Case Officer: Huimin Chen

1. SITE DESCRIPTION

The application site is located northeast of Reading Gate Retail Park, an established retail park along the A33 road, approximately 3 km south of Reading town centre. To the north of the site is Northern Way, which provides the northern access point to the Select Car Leasing Stadium (formerly Madejski Stadium), whilst to the south is South Oak Way, which provides the southern access point to the Select Car Leasing Stadium and Green Park. To the east of the site is the A33 road. The surrounding area is predominantly commercial.

The site is situated within Flood Zone 2 and an Air Quality Management Area.

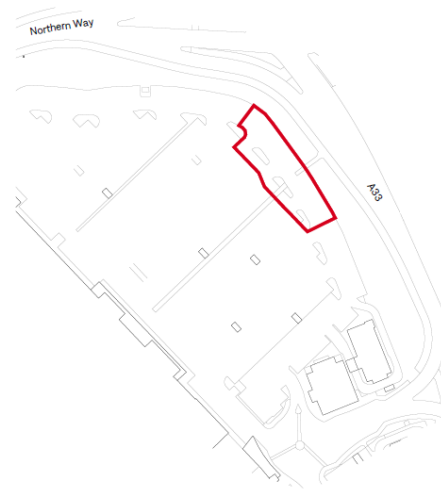


Fig 1 & 2: Site Photo Taken on 09/06/2025 & Abstract of Location Plan Submitted

2. PROPOSAL AND SUPPORTING INFORMATION

The application seeks permission for the provision of 6 electric vehicle charging bays and associated infrastructure to replace 14 existing standard parking spaces. Regarding the associated infrastructure, the scheme involves the installation of two floodlights, three touch + EV chargers, three power units, one feeder pillar, one substation, and ten NAL X-Last Nuvo bollards in composite sockets.

The proposal also involves relocating the clothes recycling bin to the north of the site. The existing footpath would remain unchanged.

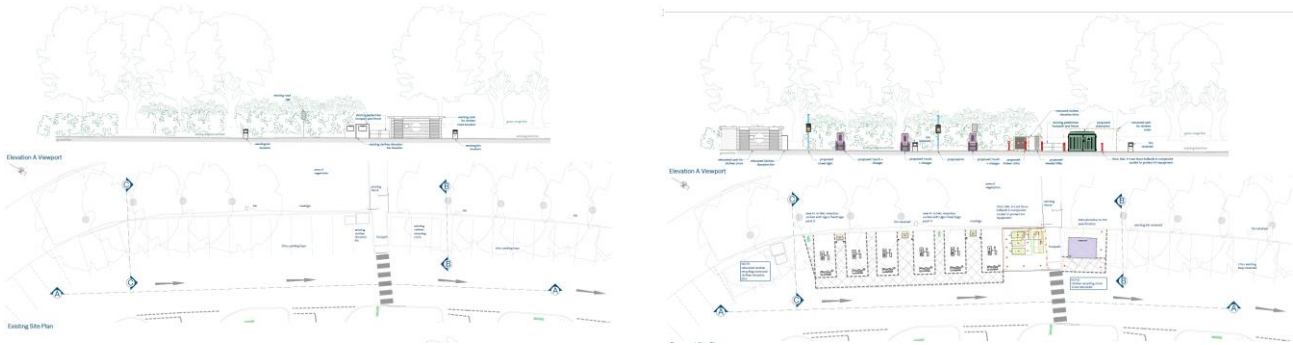


Fig 3 & 4: Existing and Proposed Floor Plans and Elevations

Plans/Documents Considered:

- Covering Letter
 - BL Reading Gate RP-SI24-102-17-P-11-C-Existing Site Plan
 - BL Reading Gate RP-SI24-102-17-P-12-B-Proposed Site Plan
 - BL Reading Gate RP-SI24-102-17-P-13-B-Site Locations and Block Plan
 - PoGo-SI24-SD-11-01-F-Touch Plus Charger
 - PoGo-SI24-SD-11-06-B-Touch plus Charger - 1800mm
 - PoGo-SI24-SD-12-01-D-Power Units
 - PoGo-SI24-SD-12-04-C-Feeder Pillar 1250A to 1600A
 - PoGo-SI24-SD-13-01-D-Floodlight-Option 1
 - PoGo-SI24-SD-13-05-B-Signage and Bollards
 - PoGo-SI24-SD-14-02-B-TR1 Substation
- Received 21/02/2025.
- Flood Risk Assessment prepared by Evans Rivers and Coastal Ltd, Ref: 3698/RE/03-25/01, dated March 2025, received 12/03/2025.
 - BL Reading Gate RP-SI24-102-17-P-E-02-Proposed Site Plan (including Elevations) received 19/05/2025.
 - BL Reading Gate RP-SI24-102-17-P-E-01-Existing Site Plan (including Elevations) received 19/05/2025.
 - BL Reading Gate RP-SI24-102-17-P-14-Proposed Site Plan - UG Services received 30/05/2025.
 - 25023_BS5837 Report v3.0, prepared by Silva Arboriculture Ltd, dated June 2025, received 13/06/2025.

Relevant Planning History:

None.

3. CONSULTATIONS

- Reading Borough Council, Environmental Protection – No objection.
- Reading Borough Council, Transport – response received 15th May 2025.

This application seeks to install six EV charging bays and associated infrastructure. No changes to the existing vehicle or pedestrian accesses are proposed.

The proposal will result in the loss of 14 standard bays, which will be replaced by 6 EV bays, therefore, the net loss of bays will be 8.

Given that there is minimal change to the overall number of parking spaces and this application is in line with local policy TR5 and EN15, in principle there are no Transport objections to this application as the loss of 8 parking bays will not adversely impact on the wider retail units. However, clarification is required if the relocation of the clothes recycling bins will result in more than 8 parking spaces being lost.

The installation of the charging points will need to conform with the latest building regulations.

The Natural Environment Officer should be contacted as there are a number of trees located in the area of the proposed EV charging points.

Planning Officer's note: Following clarification from the agent regarding the relocation of the clothes recycling bins dated 16/05/2025, further Transport comments were received on 19/05/2025 stating that the proposal is acceptable in terms of Transport, as the relocated bins would be within the curtilage of the site.

- Reading Brough Council, Natural Environment (Trees) – response received on 25th March 2025.

With reference to Proposed Site Plan, 12th February 2025, drawing no. S124-102-17-C-22 and the Arboricultural Impact Assessment, March 2025, Report no. 25023, I have the following comments:

The AIA focuses on a line of Poplar on the soft landscape strip adjacent to the site location and one small Ash within the car park area. The Poplar trees have been placed in Category 'C'. However, the collective value of the group of trees has not been considered or appreciated. The group of mature trees are situated on a busy treed corridor and therefore the Natural Environment Team would categorise them collectively as an 'A' category group.

I note that in 2.2 of the AIA, it refers to 'Proposed Site Plan – Drawing No. S124-102-17- C-02 – Rev' - which isn't the Proposed Site Plan submitted for this application. The AIA should refer to the documents that are being considered. It is important that the site plans and AIA plans are consistent, so that the true impact can be assessed. The inclusion of 'cables' and 'trenches' are shown within the AIA, the construction methods of which need to be demonstrated and considered – this is not currently included in the AMS or shown on the Site Plan.

The RPAs of the Poplars has been represented as an adjusted polygon, confining the RPAs to within the soft landscape area, where root development is more likely to have proliferated. Whilst it is recognised that the calculated RPA's consider existing hard surfaces, the development is still situated in close proximity to the trees. Caution regarding the finding and treatment of tree roots should be taken. Given the vigorous rooting nature of Poplar trees, it is entirely possible that roots may lay beneath the existing hard surface. The AMS should be amended to acknowledge this, as it currently has no mention of the treatment recommendations, specific to the BS5837 2012, when discovering tree roots. I would suggest that foundations for any structures proposed that fall within the true/unadjusted RPA (which should be shown too) should be hand dug under arboricultural supervision and roots cleaning cut with the foundations being lined with an impermeable membrane prior to being cast as concrete is toxic to tree roots.

There is an inaccuracy within section 3.10 of the AIA. It states, 'it is considered that, as the Site is already a residential dwelling...'. Reading Gate Retail Park is a commercial area and not residential. This section of the AIA is the 'Future Potential Impacts' and therefore, needs to be amended to consider the character of the Site.

To conclude, the above must be amended so that the Proposed Site Plan and the AIA are representative of each other. The amendments to the AIA will make this more acceptable in tree and landscape terms.

Planning Officer's note: The agent submitted two revised AIAs on 30/05/2025 and 12/06/2025 to address follow-up concerns regarding tree issues. The NE Officer confirmed that all concerns were addressed. Condition L7A is required for development in accordance with BS 5837:2012 Arboricultural Impact Assessment Rev 3, dated 06/2025, as received on 18/06/2025.

- **Site Notice:** A site notice was displayed in front of the entrance of Reading Gate Retail Park on 24th April 2025. The 21-day consultation period ended on 15th May 2025. No letters of representation were received.



Fig 5: Site Photo

Equality Act 2010:

In determining this application the Council is required to have regard to its obligations under the Equality Act 2010. However, there is no indication or evidence (including from consultation on the application) that the protected groups identified by the Act have or will have different needs, experiences, issues and priorities in relation to this particular planning application. Therefore in terms of the key equalities protected characteristics it is considered there would be no significant adverse impacts as a result of the development.

4. LEGAL AND PLANNING POLICY CONTEXT

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that proposals be determined in accordance with the development plan unless material considerations indicate otherwise. Material considerations include relevant policies in the National Planning Policy framework (NPPF) - among them the 'presumption in favour of sustainable development'. The following local and national planning policy and guidance is relevant to this application:

National Policy

National Planning Policy Framework (NPPF)
National Planning Policy Guidance

Reading Borough Council Local Plan (2019)

Policy CC1 – Presumption in favour of sustainable development
Policy CC2 – Sustainable design and construction
Policy CC3 – Adaptation to climate change
Policy CC7 – Design and the public realm
Policy TR5 – Car and cycle parking and electric vehicle charging
Policy EN14 – Trees, hedges and woodland
Policy EN15 – Air quality
Policy EN16 – Pollution and water resources

Policy EN18 – Flooding and drainage

SPD

Revised Parking Standards and Design SPD 2011
Sustainable Design and Construction (2019)

Local Plan Update

The current version of the Local Plan (adopted in November 2019) turned five years old on Tuesday 5th November 2024. The Local Plan was reviewed in March 2023 and around half of the policies in the plan are considered still up to date. However, the rest need to be considered for updating to reflect changing circumstances and national policy. A submission draft of the Local Plan was submitted on 9th May 2025.

Although there is a five-year period for carrying out a review of a plan after it is adopted, nothing in the NPPF or elsewhere says that policies automatically become “out of date” when they are five years old. It is a matter of planning judgement rather than legal fact whether a plan or policies within it are out-of-date. This will depend on whether they have been overtaken by things that have happened since the plan was adopted, either on the ground or through changes in national policy, for example.

Officer advice in respect of the Local Plan policies pertinent to this application is that they remain in accordance with national policy and that the objectives of those policies remains very similar in the draft updated Local Plan. Therefore, they can continue to be afforded weight in the determination of this planning application and are not considered to be ‘out of date’.

5. APPRAISAL

The main issues to be considered are:

- a) Design and impact on the character of the area and street scene
- b) Sustainable development
- c) Transport
- d) Trees
- e) Flooding
- f) Biodiversity Net Gain

a) Design and impact on the character of the area and street scene

Policy CC7 requires that all development be of a high design quality that maintains and enhances the character and appearance of the area of Reading in which it is located.

The proposal for the provision of 6 electric charging bays is considered small in scale within the context of the large established car park at Reading Gate Retail Park, which is surrounded by retail units. Additionally, the proposal site is adjacent to a line of poplar trees situated along a busy treed corridor, which would help soften the view of the installed EV equipment. Therefore, the proposal is not considered to have detrimental impacts on the local environment.

b) Sustainable development

Policies CC1 and CC2 state that new development will be acceptable if the design of buildings and site layouts use natural resources (energy, water, materials, etc.) efficiently and responsibly, considering climate change impacts. Policy CC3 highlights the importance of incorporating trees and planting in landscape schemes to provide shading, connect habitats, and use native, adaptable plants that can thrive under predicted climate conditions. Policies EN15 and EN16 require that development will not be damaging to the environment or sensitive receptors through air, land, noise, or light pollution.

According to the submitted 25023_BS5837 Report v3.0, received on 13th June 2025, no trees will need to be removed, and no facilitation pruning will be required. In addition, the provision of electric vehicle

charging bays is considered a means of encouraging sustainable transportation, as it could help tackle carbon emissions and improve air quality. This supports government climate targets and aligns with both local and national environmental goals. Therefore, the proposal is considered acceptable in terms of its sustainability aspects.

c) Transport

Policy TR5 requires the development to provide car parking and cycle parking that is appropriate to the accessibility of locations within the Borough to sustainable transport facilities, particularly public transport. Additionally, within communal car parks for residential or non-residential developments of at least 10 spaces, 10% of spaces should provide an active charging point. Policy EN15 states that development should have regard to the need to improve air quality and to reduce the effects of poor air quality.

Following clarification from the agent regarding the relocation of the recycling clothes bin, the Transport consultee confirmed that there are no objections on transport grounds, as the loss of eight parking bays is not considered to have an adverse impact on the wider retail unit.

In addition, the proposal site is located within a long-established car park that currently lacks electric vehicle (EV) charging points. The Reading Borough Local Plan 2019 encourages new developments to include EV charging infrastructure, as the provision of such equipment can promote the use of low-emission vehicles. This, in turn, would contribute to addressing local air quality issues related to traffic and congestion. Therefore, the proposal is considered to comply with Policies TR5 and EN15 of the Reading Borough Local Plan 2019.

d) Trees

Policy EN14 states that new development shall make provision for tree retention and planting within the application site, particularly on the street frontage, or off-site in appropriate situations, to improve the level of tree coverage within the Borough, to maintain and enhance the character and appearance of the area in which a site is located, to provide for biodiversity and to contribute to measures to reduce carbon and adapt to climate change. Measures must be in place to ensure that these trees are adequately maintained.

The proposal site is located within the established vehicle parking area of Reading Gate Retail Park, adjacent to a line of Poplar trees situated within a treed corridor to the northeast. These trees are not subject to Tree Preservation Orders.

The submitted revised BS 5837:2012 Arboricultural Impact Assessment (Version 3), dated June 2025 and received on 13th June 2025, confirms that no pruning or removal of trees would be required to facilitate the proposal. Additionally, the AIA confirms that the proposed design footprint would fall outside the calculated Root Protection Areas (RPAs) of the recorded trees, due to the underlying Lambeth Group bedrock geology and the presence of existing hard surfacing.

According to Appendix C (Arboricultural Method Statement) of the BS 5837:2012 AIA V3, tree protection measures would be implemented prior to the commencement of construction works to prevent potential harm to the trees. A condition would be imposed to secure the installation of these protective measures.

Therefore, the proposal is considered acceptable in terms of arboricultural impact.

e) Flooding

Policy EN18 states that development will be directed to areas at lowest risk of flooding in the first instance, following the Sequential and Exceptions Test set out in the NPPF, and taking into account the effects of climate change. It will consider flooding from all sources, including fluvial, surface water, groundwater and

sewer flooding. Wherever possible, development should be designed to reduce flood risk, both on- and off-site.

As the proposal site is located within Flood Zone 2 as defined by the National Planning Policy Framework (NPPF), a Flood Risk Assessment (FRA) is required to support the application. The submitted FRA (ref: 3698/RE/03-25/01), dated March 2025, considers potential flooding from fluvial sources, groundwater, surface water, sewer systems, reservoirs, canals, and other artificial sources. With the exception of fluvial flooding, all other sources are assessed to pose a low risk or are considered unlikely to affect the site.

With regard to fluvial flood risk, the report indicates that the site is located outside the design climate change 1-in-100-year flood extent. During the extreme 1-in-1,000-year flood event, the predicted flood depth is 0.09m. The report notes that it may not be practical to elevate the EV charging points and feeder pillar above this extreme flood level. However, the substation will be installed on a 100mm-high plinth, placing it above the predicted flood depth. In addition, prior to the onset of any flood event, all remaining utilities would be shut down as part of the site's flood management plan. The proposals do not involve any permanent on-site staff; only occasional, pre-planned visits for monitoring and maintenance purposes are anticipated. As such, the number of people accessing the site would represent a minimal increase from the current use, and visits would be short in duration.

Additionally, the site is located within an Environment Agency Flood Warning Area, where a minimum of two hours' notice is expected before any level of flood warning is issued. The proposal site is situated in the northeast section of a long-established vehicle parking area. The surrounding area is commercial in nature. The proposal is considered to pose minimal risk to local residents.

Therefore, the proposal is considered acceptable overall in terms of flood risk, provided that the suggested measures outlined in Section 6 (Flood Risk Mitigation and Evacuation) of the submitted FRA (ref: 3698/RE/03-25/01), are implemented prior to the first operation of the development. For example, the site must be registered with the Flood Warning Direct service, and the EV charging points and feeder pillar must be shut down before the onset of floodwater. Additionally, signs and information plaques would be installed regularly across the site. Maintenance workers would be required to check the Flood Warning Direct service before visiting the site and postpone any visits if a flood risk is identified. The development of a Business Flood Plan would also be required.

A condition is recommended to be imposed to secure the implementation of the flood protection measures. This is in accordance with Environment Agency Standing Advice and Policy EN18 of the Reading Borough Local Plan.

f) Biodiversity Net Gain

The proposal site is situated within a long-established hardstanding vehicle parking area; therefore, based on the plans and site visits, the proposal would not result in any loss of habitat. A Biodiversity Net Gain (BNG) calculation is not required, as no existing habitat would be affected.

Additionally, the guidance regarding the types of development that will be exempt from mandatory biodiversity net gain states that:

Developments below the threshold

A development that does not impact a priority habitat and impacts less than:

- *25 square metres (5m by 5m) of on-site habitat*
- *5 metres of on-site linear habitats such as hedgerows*

A development 'impacts' a habitat if it decreases the biodiversity value.

6. CONCLUSION

The proposed development has been assessed as set out above and is considered to be acceptable on that basis, subject to the following conditions.

7. RECOMMENDATION

Approve with Conditions

Recommended Conditions:

Time Limit

Approved Plans

Materials (As Specified)

Arboricultural Method Statement (As Specified)

Flood Protection Measures (As Specified)