



Reading Borough Council Local Plan Partial Review Examination

Stage 2 Hearing Statement

Matter 7 - Transport

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Prepared for:
The University of Reading

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1 Matter 7: Transport

1.1 Issue 1 – Question 7.6

Is Policy TR5 justified and consistent with national policy and Building Regulations? What is the evidential basis for non-residential development going beyond Building Regulations?

- 1.1.1 The University's representation to the Regulation 19 consultation raised concerns over the increase in EV charging requirements for non-residential developments where there are at least 10 spaces from 10% to 20%. This quota of 20% of spaces providing an active electric vehicle charging point has been continued into the LPPU submission draft.
- 1.1.2 The University supports the updates proposed to this policy to reflect that EV charging for residential developments is generally now covered by the Building Regulations (Approved Document S). It is also supportive of the expansion of the policy to include a presumption in favour of charging infrastructure.
- 1.1.3 However, the University remains concerned regarding increasing the EV charging requirement for non-residential developments where there are at least 10 spaces from 10% to 20%. It is not considered that there is sufficient justification for a requirement that goes beyond current buildings regulations (Approved Document S (2021)) which requires one electric vehicle charging point for new non-residential/non-mixed use buildings with more than 10 parking spaces.
- 1.1.4 It could quickly become redundant given the advancement of technology in this area and could place a considerable strain on electricity supplies. The demand for 'at-work' charging facilities is likely to plateau as increasing numbers of dedicated EV charging facilities come forward, as the speed of EV chargers increases and as more and more people have charging facilities at home. The Statement given in the House of Commons (on 13th December 2023) sets out the Government does not expect plan-makers to set local energy efficiency standards for buildings that go beyond current or planned buildings regulations. It is considered that this principle could also be applied to the provision of EV charging points. The approach taken for EV charging for residential developments should also be applied to non-residential development - the policy should be silent as requirements are now covered by the Building Regulations (Approved Document S). Regarding consistency with national policy and Building Regulations, we do not consider TR5 to be in accordance. As stated above, requirements for the installation of electric vehicle charging points and cable routes for non-residential buildings are covered by Section 3 of Approved Document S (2021) which supports Buildings Regulations 2010. Furthermore, a Written Ministerial Statement (WMS) published in 2023 on Local Energy Efficiency Standards states, "the Government does not expect plan-makers to set local energy efficiency standards for buildings that go beyond current or planned buildings regulations".
- 1.1.5 In this light, Policy TR5 should support but be 'silent' on the required quantum of provision of electric vehicle charging points. The 2023 WMS also acts as evidence to suggest that regardless of use class, plan makers are not expected to go beyond Building Regulations with the aim being to standardise regulations and remove any potential local complexities.

