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South Holland District Council,
Council Offices,
Priory Road,
Spalding,
Lincolnshire,
PE11 2XE

Sent via the Planning Portal only

17th October 2025

Dear Sir/Madam,

Land at Spalding Retail Park, Holland Market, Spalding, PE11 1RQ

Hayley Knight Planning Limited, on behalf of Iduna Evci Asset Co 1 Limited (BE.EV), hereby apply to South Holland District Council for the provision of one substation, two power banks, one feeder pillar and associated bollards, and two lighting columns to support a scheme for 11 no. electric vehicle charging spaces at Spalding Retail Park, Holland Market, Spalding.

This planning application comprises of the following documents, as submitted on the Planning Portal (reference PP-14148148):

- Application form;
- Site location plan, reference 714-3-0-001 revision P1;
- Existing Site Plan, reference 714-3-0-002 revision P1;
- Existing Elevation A Plan, reference 714-3-0-003 revision P1;
- Existing Elevation B Plan, reference 714-3-0-004 revision P1;
- Proposed Site Plan, reference 714-3-1-001 revision P1;
- Proposed Elevation A Plan, reference 714-3-2-001 revision P1;
- Proposed Elevation B Plan, reference 714-3-2-001 revision P1;
- Proposed Charger Details Plan, reference 714-3-5-001;
- Proposed Power Bank Details Plan, reference 714-3-5-002;
- Proposed Feeder Pillar Details Plan, reference 714-3-5-003;
- Proposed Substation Details Plan, reference 714-3-5-004; and
- Proposed Bollard, Signage and Lighting Details Plan, reference 714-3-5-005.

These documents should be read alongside this submission letter, which sets out the planning considerations associated with the proposals.

The requisite fee of £298.00 has been paid directly through the Planning Portal.



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The Applicant

Be.EV is a national, public electric vehicle (EV) charging provider that is creating a fair, future-proof infrastructure legacy to sustainably accelerate the UK's EV revolution across the country. Backed by £110 million from Octopus Energy Generation, one of Europe's largest renewable energy investors, Be.EV works closely with public and private sector organisations to make electric vehicle use accessible to every community. Their mission is to work in close collaboration with their partners on their journey to electrification by creating bespoke, design-led and fully funded EV charging solutions that add value to organisations and delight EV drivers.

Be.EV currently maintain the largest network of public EV chargers in Greater Manchester and are rapidly expanding their national footprint. Their mission is to listen to their customers: this means putting the right chargers in the right places and maintaining their impressive 99.6% uptime record. The employee-owned company's membership scheme has 25,000+ members who get discounted charging rates alongside pay-as-you-go drivers.

Be.EV currently operates a national network of close to 300 live charges with an additional 1,000+ chargers in the current pipeline.

The proposed Ultra Rapid charger can, depending on the vehicle, charge a vehicle up to 80% of its capacity within 15-20 minutes.

Be.EV have a rigorous maintenance schedule to ensure that 99.6% of their chargers are available for use at any given time. In order to maintain these levels availability BE.EV have a 24 hour, 7 days a week, help desk for service users, and service level agreements with suppliers to ensure any payment issues are resolved within 24 hours, and any electrical issues are resolved in 4 hours.

The Site

The Site comprises of 238.3 square metres of an existing surface level car park that forms part of Spalding Retail Park, Holland Market. The Site is currently occupied by 17 no. existing standard parking bays in two separate areas of the car park. The northern most part of the Site contains two parking spaces and an area landscaping at the back of the parking bays. The southern part of the application Site comprises of 15 no. parking bays formed in two rows that back on to each other. A strip of ornamental landscaping is located along the northern boundary of these rows. The two areas of the Application Site are separated by a through route through the car park.

Wider Site Context

The wider site comprises of a surface level car park that serves the Spalding Retail Park at Holland Market, which is occupied by a number of national operators that are typically located at such retail parks including Pound Stretcher, Halfords Sainsbury's.

Planning Context and Constraints

The Site is located wholly in Spalding Town Centre as identified on the Sub Regional Centre and Main Service Centre Policies Map for South East Lincolnshire Local Plan.



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The Site is located within flood zones 3 as identified on the Government's Flood Map for Planning¹.

The Site is not subject to any other typical planning constraints.

Relevant Planning Application History

There were no planning applications at the Site since 2006 as identified on the Council's online planning application search.

There were 3 no. applications in close proximity to the Site in this period, all of which relate to the 'We Buy Any Car' pod which was granted retrospective planning permission in November 2023. The approved plan indicates that any vehicles associated with this use will be parked in the row adjacent to the office pod, i.e. to the north and west of the land subject of this application.

The Proposal

The proposals comprise of the provision of one substation, two power banks, one feeder pillar and associated bollards, and two lighting columns to support a scheme for 11 no. electric vehicle charging spaces at Spalding Retail Park at Holland Market in Spalding.

The permitted development rights for Electric Vehicle (EV) Upstands and the associated equipment changed on 29th May 2025 to relax the conditions and limitations for permitted development for EV charging upstands, which typically have limited planning issues. The changes in permitted development for EV upstands have been implemented in order to simplify the planning process and ensure that the EV charging network across the UK can be increased to support the transition from internal combustion engines to EVs, which is one of the Government's key objectives in achieving net zero. As a result of this change in permitted development it is considered that the charging upstands required to support the EV charging bays at this Site benefit from permitted development under Class E, Part 2, Schedule 2, of the Town and Country Planning (General Permitted Development) (England) Order 2015 as amended, as:

- the bays, EV upstands and associated bollards positioned to protect them are all located at 'ground level within a non-domestic area lawfully used for off-street parking';
- the bays, EV upstands and associated bollards are all necessary for the operation of the upstands;
- the proposed upstands are less than 2.7 metres in height, see the Proposed Charger Details Plan;
- the Site is not within a designated scheduled monument, or in the curtilage of a listed building; and
- the scheme comprises of one upstand proposed for two every EV charging bays and one upstand for bay 11, so below the limitation of no more than one upstand per EV charging bay.

Information on the electrical charging upstands and bollards that protect them have been included for information only.

This application is therefore only seeking for planning permission for the substation, feeder pillar and power banks and bollards associated with them, and the two lighting columns proposed to illuminate the Site as these are

¹ [Get flood risk information for planning in England- Flood map for planning- GOV.UK](#)



considered to not benefit from permitted development for the following reasons:

- the substation exceeds the volume allowed for substations as set out in Class E, Part 2, Schedule 2, of the GPDO;
- the power banks and feeder pillar are all located in soft landscaping, which is not considered to be within an area lawfully used for off-street parking; and
- the lighting columns are equipment that is not necessary for the operation of the charging upstands.

In order to ensure the safety of customers and the proposed EV charging equipment, the Applicant may mount closed circuit television and automatic number plate recognition cameras on the lighting columns overlooking the charging bays.

The six sets of signage are located at the ends of bays 2, 4/5, 6, 7, 8/9 and 11 as shown on the Proposed Layout Plan. It is considered that these small signs benefit from deemed consent for forecourt signage (Class 6, Part 1, Schedule 3 of the Town and Country Planning (Control of Advertisements) (England) Regulations 2007). These signs are also shown on the submitted plans for information only.

Operational Information

The charging facility is proposed to be available 24 hours a day.

The type of EV charging equipment proposed will, depending on the vehicle, charge a vehicle up to 80% of its capacity within 15-20 minutes.

Be.EV have a regular maintenance schedule for their equipment as set out above to ensure that the proposed spaces will be available and reliable for users.

Planning Policy Context

The Local Plan for South Holland District Council comprises of the South East Lincolnshire Local Plan (adopted March 2019). This document is the Statutory Development Plan, the policies of which new development will be assessed against. In respect of the proposed development the following policies are considered to be relevant:

- Local Plan Policy 1: Spatial Strategy;
- Local Plan Policy 2: Development Management;
- Local Plan Policy 3: Design of New Development;
- Local Plan Policy 4: Approach to Flood Risk;
- Local Plan Policy 24: The Retail Hierarchy;
- Local Plan Policy 25: Supporting the Vitality and Viability of Boston and Spalding Town Centres;
- Local Plan Policy 28: The Natural Environment;
- Local Plan Policy 30: Pollution;
- Local Plan Policy 33: Delivering a More Sustainable Transport Network; and
- Local Plan Policy 36: Vehicle and Cycle Parking.

The National Planning Policy Framework (December 2024), associated Planning Practice Guidance (PPG) and adopted supplementary planning guidance must also be given due weight in the planning assessment.



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Planning Considerations

The proposed substation, power banks, feeder pillar and associated bollards, and lighting columns, which are needed to support a scheme for 11 no. electric vehicle charging spaces, do not benefit from permitted development as set out in Town and Country Planning (General Permitted Development) (England) Order 2015, Schedule 2, Part 2, Class E (electrical upstand for recharging vehicles). As set out above the rest of the scheme does benefit from permitted development and so details have only been provided for information. This application is therefore seeking planning permission for the proposed substation, feeder pillar, power banks, bollards and lighting columns only.

It is clear from national policies and guidance that ultra low and zero emission vehicles are classed as sustainable transport modes. Opportunities for sustainable transport modes, as set out in the NPPF and PPG should be promoted as a way of addressing the challenge of climate change. Moreover the provision of more EV charging bays, that are well maintained and reliable, will help the United Kingdom make the transition from petrol and diesel vehicles to EVs, which is a pivotal to lowering the UK's emissions. The principle of the proposed development, which will provide drivers of electric vehicles a place to charge their cars, therefore fully aligns with National policies and objectives.

As the proposals will assist drivers in reducing reliance on petrol and diesel cars, the proposed development complies with the general objective for a more sustainable transport network as set out in Local Plan Policy 33. Whilst the policy does not make reference to electric vehicles and the provision of charging facilities, it is clear from national policy that EVs fall within this definition. The proposed development is therefore considered to wholly comply with Local Plan Policy 33.

The Site is located within Spalding Town Centre as identified on the Local Plan Policies Map. Applicable Local Plan Policies 24 and 25 set the retail hierarchy across the Boroughs, and require new development to support the vitality and viability of Boston and Spalding respectively. The proposed development will introduce a new EV charging facility within Spalding Town Centre, one of the two Sub-Regional Centres in Boroughs which Local Plan Policy 24 identified as a locational focus for new development that will enhance the vitality and viability. The EV charging facility is anticipated to be used as part of a linked trip for those visiting the retail, food and drink premises in the Town Centre, and thus will comply wholly with the policy requirements of Local Plan policies 24 and 25.

On a more general policy level it is noted that Local Plan Policy 1 seek to direct new development over the plan period within the settlement boundaries of Boston and Spalding as the Sub-Regional Centres. The proposals therefore complies with the spatial strategy of the Local Plan.

The Site falls wholly within an area at risk of flooding as identified on the Government's flood maps. Local Plan Policy 4 sets out the local approach to flood risk and requires Applicants to demonstrate that the vulnerability of the development proposed is compatible with the flood zone. The proposed use is not explicitly referred to in the NPPF Annex 3's Flood Risk Vulnerability Classification, however it is considered to fall within the 'less vulnerable' classification which does include car parks. In accordance with the 'Flood risk vulnerability and flood zone 'incompatibility'' table contained in the Planning Practice Guidance, less vulnerable development can be



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suitable in areas at risk of flooding. In addition, the proposed development will not significantly increase surface water run-off given the area of amenity grassland lost is minimal. The proposed development is therefore not considered to be contrary to national or local flood and drainage policies.

Local Plan Policy 3 requires new development to create distinctive places through the use of high quality and inclusive design and layout that enhances local character. The scheme has been designed to respect and integrate into the existing public realm, notably the internal layout and design of the car park. The modern aesthetics of the substation, feeder pillar and power banks are of a standard design that merges into most UK streetscenes and the adjacent modern retail buildings, and are therefore considered to be appropriate in this location given its commercial nature. This policy also requires that public spaces are lit. Moreover it is noted that the Site is not located within any designated Conservation Areas or special design areas. The proposals have therefore been designed to comply with Policy 3.

Local Plan Policy 30 relates to pollution concerns and seeks to ensure that new development does not have a detrimental impact on existing local amenity. Some of these criteria are also iterated in Local Plan Policy 3 notably the need to create a safe and secure environment, consideration of lighting, and considerations of residential amenity. In the first instance the proposed equipment facilitates EV charging bays. The use EVs, as opposed to petrol and diesel vehicles, will assist improving local air quality, as such the nature of the development complies with this policy criterion. The presence of the EV charging bays, and their 24 hour operation will hopefully ensure the presence of legitimate users of the District Centre throughout the evening to ensure a safe and secure environment is created. Moreover, this area of the car park will benefit from new lighting to discourage crime and anti-social behaviour. The proposed development is located in an existing commercial area of the Borough, with no residential homes nearby. The operation of the EV bays will therefore not have any detrimental impact on residential amenity. The proposals therefore comply with Local Plan Policy 30.

The proposed equipment support EV charging bays that have been designed to be useable by people of all abilities. The parking spaces benefit from hatching separating them to enable ease of use by people of all abilities, as well as providing gaps for the charger units. The charger upstands, which benefit from permitted development, are also positioned at the same level as the parking spaces. The development therefore benefits from inclusive design features in accordance with Local Plan Policy 3.

The majority of the Site comprises of hardstanding, which does not have an ecological value. The proposal will result in the loss of just over 11 square metres of existing ornamental planting in the Retail Park car park, which is below the 25 square metre threshold for mandatory biodiversity net gain considerations, and will have a minimal impact on the local environment. The proposals are therefore not considered to be contrary to Local Plan Policy 28.

Summary and Conclusion

This application is seeking planning permission for the provision of a substation, feeder pillar, two power banks, associated bollards and two lighting columns to support a scheme for 11 no. electric vehicle charging spaces at the Spalding Retail Park at Holland Market in Spalding. As set out in this covering letter the proposed development



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supports the installation of EV charging upstands and associated equipment which benefits from permitted development, and ultimately aligns with both national and local sustainable transport policies, through the expansion of a reliable network of EV charging spaces, making the use of EV more pragmatic and accessible.

The layout of the proposed development has due regard to the existing car park in the position and layout of the development. The location of the proposed substation, power banks, feeder pillar and lighting columns all comply with the policy objectives for new development as set out in the Local Plan, as it is within Spalding Town Centre and therefore enhances the vitality and viability of the designated Sub-Regional Town. The design of the development is fairly standard, but reflects the modern Town Centre, and has been designed to assimilate into the existing streetscene.

In summary the proposals are considered to comply with national and local planning policies. Local Plan Policy 2 requires the Council to permit development that meet the sustainable development considerations set out in the policy. This letter has set out how the proposals comply with local policies, include the Policy 2 criteria and therefore it is respectfully requested that planning permission be granted expeditiously.

I trust the information submitted with the application is appropriate and can be registered and validated expeditiously. If there is anything further that we can assist with, please do not hesitate to contact me.

Yours sincerely,



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