

# CONSULTATION RESPONSE

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## **Consultation on the Electric Vehicle Charging: Guidance for New Developments Supplementary Planning Document (SPD)**

### **Introduction**

I'm passionate that we must strive to enhance our environment, countryside and rural communities, not only for our own wellbeing but to leave a sustainable inheritance to future generations. I'm a Bedfordshire resident and champion these and other causes predominantly within Gravenhurst, Meppershall, Shillington and surrounding villages.

### **Summary**

Central Bedfordshire Council's ("CBC") commitment to tackling climate change should be welcomed by all of us, as should its ambition to make our county more sustainable as expressed in the 'Our Vision 2050' document.

As a predominantly rural community the car will remain an important mode of travel for many people into the future, and the provision of electric vehicle ("EV") charging infrastructure at home will be important if we're to meet our international and national commitments. The switch to EVs is expected to accelerate, and the proposed guidance should therefore be welcomed to ensure that switch is supported by adequate infrastructure. Avoiding retrofits is sensible, and the guidance on futureproofing is important to ensure the charging infrastructure is easily scalable (and in fact does scale) to address future demand.

The requirements in building regulations that all new homes and commercial developments shall have EV charging infrastructure is long overdue, and I have two specific practical observations in relation to CBC's proposed guidance –

### **1. Provision of EV Charging Points in New Residential Developments**

In Table 1, Section 5.4 of the guidance, it is proposed that one active EV charging point per dwelling will be required where that new residential dwelling has a garage or private

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driveway. This guidance seems to apply irrespective of the size of the dwelling and the number of car parking spaces available, and so presumably assumes that there is demand for only one EV charging point per dwelling, at least at current EV adoption levels.

As drafted, it's reasonably foreseeable that larger families (moving into larger dwellings with multiple car parking spaces) will have insufficient charging capacity from the day they move in and may need to retrofit very soon after occupying their new home. If this were to happen, it would seem to be an unintended consequence given CBC's stated objective on the consultation webpage to "*avoid unnecessary costs to pay for the retrofitting of charge points*".

To the extent permitted by the Building Regulations it would be worth mitigating this potential issue now by providing, in these circumstances, that an EV charging point should be provided for each allocated parking space per dwelling.

### 2. Off-site Contributions

Section 6.8 of the guidance provides that *'New developments unable to facilitate the required number of active and passive chargers on site (due to power supply limitations and high upgrade costs, or space constraints) are expected to contribute towards the provision of alternative EV charging facilities [...] at appropriate off-site locations or within the site at a later date should grid capacity become available'* [my emphasis added].

This seems to me to go against the spirit of para. 110 of the National Planning Policy Framework, which provides that *'in assessing sites that may be allocated for development plans, or specific applications for development, it should be ensured that [...] (a) appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location'* [my emphasis added].

In rural areas the car will remain a primary mode of travel, and with some very narrow exceptions it will remain the only feasible transport mode to be promoted in the circumstances. Therefore, residential developments in most if not all locations will need to promote EV charging infrastructure at home, with certainty that it will be installed by developers.

Providing "off-site contributions" - in the circumstances described in section 6.8 - seems to me to be inconsistent with both the national and local contexts and should be reconsidered. I would suggest that the guidance is strengthened so that no new rural developments are approved if there are any uncertainties about whether EV charging infrastructure can be provided at the time of the initial build. For the scenario outlined in section 6.8, it would be more sympathetic to the policy objectives if CBC were to consider a site itself inappropriate for development until grid infrastructure, for example, has first been made available.

Yours,

Blake Stephenson