

Central Lincolnshire Policy NS18: Electric Vehicle Charging Evidence Report

Formerly Policy S17

March 2022



Contents

1. Introduction.....	3
2. Policy Context.....	3
National Policy and Guidance.....	3
Local Policy.....	4
3. Context and Evidence.....	4
4. Issues and Options Consultation.....	5
5. Regulation 18 Consultation.....	5
6. Proposed Approach in Proposed Submission Local Plan.....	6
7. Reasonable Alternative Options.....	6
8. Conclusion.....	7

1. Introduction

- 1.1. The Central Lincolnshire Local Plan is being updated since the first Local Plan for Central Lincolnshire, an area covering the districts of City of Lincoln, North Kesteven and West Lindsey, was adopted in April 2017.
- 1.2. This Evidence Report (which is one of a collection) provides background information and justification for Policy NS18, which relates to electric vehicle charging.

2. Policy Context

National Policy and Guidance

- 2.1. Since the Central Lincolnshire Plan was adopted, the National Planning Policy Framework (NPPF) was updated in July 2018 with subsequent additional changes being published in February 2019 and again in July 2021.
- 2.2. In relation to electric vehicle charging, the NPPF stipulates:
 - Applications for development should be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations (para 112).
 - If setting local parking standards, policies should take into account the need to ensure an adequate provision of spaces for charging plug-in and other ultra-low emission vehicles (para 107).
 - Fundamentally, that “the planning system should support the transition to a low carbon future... it should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions..” (para 152).
- 2.3. The Planning Practice Guidance (PPG) was first introduced in 2014 and offers ‘live’ government guidance. The PPG provides guidance to help in the implementation of policy in the NPPF.
- 2.4. PPG currently contains the following guidance in relation to electric vehicle charging:
 - *Considerations that may be relevant to determining a planning application include whether the development would: Lead to changes (including any potential reductions) in vehicle-related emissions in the immediate vicinity of the proposed development or further afield. This could be through the provision of electric vehicle charging infrastructure...* (Reference ID: 32-006-20191101)
 - The NPPG gives examples of mitigation options for impact on air quality, one example is *‘including infrastructure to promote modes of transport with a low impact on air quality (such as electric vehicle charging points)’* (Reference ID: 32-008-20191101)
- 2.5. Also at national level, the Government is planning on banning the sale of new diesel and petrol cars from 2030¹ -10 years ahead of its original target of 2040. It is therefore imperative that local policy be proactive in responding to this national agenda.
- 2.6. Since the Draft Local Plan was published for consultation, there have been updates to Building Regulations in relation to electric vehicle charging. In December 2021 a new Part

¹ <https://www.gov.uk/government/news/government-takes-historic-step-towards-net-zero-with-end-of-sale-of-new-petrol-and-diesel-cars-by-2030>

S was added which addresses Infrastructure for charging electric vehicles. These regulations will come into effect in June 2022 and will require the provision of charging points in both residential and non-residential developments, with specific levels of requirements set out for different uses.

Local Policy

- 2.7. The current Local Plan (2017) does not set specific requirements for the provision of electric vehicle charging infrastructure. Rather, policy LP13, Accessibility and Transport, requires 'all developments' (where appropriate) to demonstrate that they have had regard to ensuring 'allowance is made for low and ultra-low emission vehicle refuelling infrastructure' (criteria 'd' of LP13).

3. Context and Evidence

- 3.1. The Central Lincolnshire Authorities were previously of the opinion that a specific policy on electric vehicle charging is needed, in light of the expected ban on the sale of petrol and diesel cars in less than a decade's time and given there is no specific national planning policy supporting this move: a local policy requirement was deemed necessary to ensure that there is adequate and sufficient infrastructure.
- 3.2. However, the newly introduced mandatory (from June 2022) Building Regulations requirements changes this: as a result, a new policy option was introduced and considered following the Draft Local Plan consultation: it is the new policy option that is taken forward in the Proposed Submission Local Plan as the preferred policy approach.

Climate Change Evidence 2021

- 3.3. Consultants were appointed in July 2020 to investigate the scale of Central Lincolnshire's contribution to greenhouse gas emissions and climate change, and the opportunities that exist to tackle these problems locally, including through the Local Plan.
- 3.4. This work set out the overarching context for Central Lincolnshire identifying what would need to be done in order to achieve a carbon neutral Central Lincolnshire by 2050 (and 2041 to align to the science-based approach) to accord with the Paris Agreement. This research painted a very challenging picture to achieve these goals.
- 3.5. This work was broken down into a number of distinct tasks which combine together to provide a holistic picture for the area. Of particular relevance for Policy NS18 were Task C Carbon Reduction Targets Policy Recommendations and Task E Infrastructure Requirements.
- 3.6. Task C analysed the pace and scale of emissions reductions required: the analysis showed that emissions from the transport sector need to reduce by 20% annually and that transport is one of the sectors with the greatest potential for emissions reductions, with technology largely already available (albeit with advances to be made).
- 3.7. Task C identified that the private market indicates that electric vehicles will play a dominant role in low emissions transport and growth in sales supports this, but highlighted that one of the biggest barriers is access to charging points. Task C therefore recommended that the Local Plan should and must address this through requiring adequate provision on new developments.

- 3.8. Task E highlighted that the switch to electric vehicles (EVs) required to decarbonise transport requires significant infrastructure investment and support if it is to be as rapid and comprehensive as is needed and recommended:
- In new developments, EV charging points will certainly be required to allow residents to charge EVs overnight, at home.
 - In older homes and particularly in urban areas where on street parking is the norm, new infrastructure will be needed to provide fair access to charging points for residents' cars and vans.
 - A Local Plan which responds to the particular character of each area is needed to ensure uniformity of access to cost effective charge points right across the District and thereby encourage people to change to EVs from fossil fuel vehicles.
- 3.9. Another key conclusion of Task E was that whilst the switch to EVs is essential, this alone may not achieve the rapid decarbonisation of transport needed to meet the Tyndall Centre Budgets and it is likely that a significant reduction on private vehicle journeys will also be required, so the Local Plan should support active travel – walking and cycling – as far as possible.

4. Issues and Options Consultation

- 4.1. Policy LP13 Accessibility and Transport of the 2017 Local Plan was initially proposed to be retained in the new Local Plan unchanged: objections were raised at the Issues and Options consultation, with one area of concern being that the policy should be strengthened in respect of electric vehicle charging facilities.
- 4.2. Further comments included suggestions that all developments with off-street parking should include electric charging points; and that retail and employment development with parking should have charging stations.

5. Regulation 18 Consultation

- 5.1. In light of the responses to the Issues and Options Consultation, following further review and consideration of National Policy, and given the 'end date' for the sale of petrol and diesel cars has been brought forward from 2040 to 2030, it was proposed in the Draft Local Plan that the new Central Lincolnshire Local Plan set specific requirements in relation to electric vehicle charging infrastructure.
- 5.2. The Draft Local Plan proposed a policy that would:
- Set minimum requirements for all applications that include parking spaces.
 - Set differing requirements for proposals in use classes C3 and C4, and for all other proposals.
 - Require use class C3 and C4 proposals to have sufficient and accessible electrical supply to driveway/ garage/ parking space to enable easy installation of charging points.
 - Require that in the case of 'all other' proposals (i.e. Non C3 or C4) charging points are installed on a minimum percentage of spaces, and the remaining spaces have an electrical supply to enable installation of further charge points at a later date,

thus future proofing developments making them adaptable to future technological changes.

- 5.3. A Consultation Draft of the Local Plan was published for consultation between 30 June and 24 August 2021. During this eight week consultation comments were received on the plan, the policies within the plan, and supporting information and evidence.
- 5.4. The response to the draft policy was mixed. While some respondents felt that the policy was too stringent, and need more flexibility, others felt that it should go further given the high levels of car ownership. There were concerns regarding viability, and the capacity of the electricity network.

6. Proposed Approach in Proposed Submission Local Plan

- 6.1. In light of the responses to the Draft Local Plan Consultation, and following the addition of Part S Building Regulations in December 2021, it is no longer proposed that the new Central Lincolnshire Local Plan will set specific requirements in relation to electric vehicle charging infrastructure. Doing so could result in conflict and duplication. Instead, it is proposed that the policy will refer to the newly introduced Part S Building Regulations, set out criteria regarding the location of the charging points, and requiring provision of infrastructure to enable further points to be installed at a later date.

7. Reasonable Alternative Options

- 7.1. As mentioned above, following the Regulation 18 consultation on the Draft Local Plan, an additional policy option was introduced- option 4. In addition to this fourth policy option, 3 other options were considered: these 3 options were the options previously considered.
- 7.2. Policy option 1 was the preferred approach presented in the Regulation 18 Draft Local Plan: a policy requiring a minimum of 10% of parking spaces to have electric vehicle charging points for all development proposals which include parking spaces (except those in use classes C3 and C4) and remaining spaces to be serviced by infrastructure to allow installation of further points at a later date. For development in use class categories C3 and C4, the requirement is for an electrical supply to the driveway and/or garage, and/or parking space.
- 7.3. Option 2 was to have a policy setting an optional requirement for developments to provide electric vehicle charging points. The third option was to have no local policy and instead rely on national policy and guidance as set out in the NPPF and NPPG.
- 7.4. Options 1 to 3 were previously assessed as part of the Sustainability Appraisal work on the Regulation 18 Draft Local Plan. Options 2 and 3 scored the same in the appraisal. Both were discounted because:
 - They are expected to have neutral or uncertain effects in relation to most of the sustainability objectives.
 - There was potential for negative impact in relation to the 'waste' and 'climate change effects and energy' objectives.

- In the case of Option 2 (optional requirement), the uncertainty in relation to the impact on most of the objectives comes from the fact that the degree to which developers will install charging points voluntarily is unknown. There is potential for adverse impact in relation to the waste objective, as if electric vehicle charging points are not installed at construction, the retrofitting of them in the future could result in the disposal of waste materials (e.g. excavated concrete). Such a policy approach could also have adverse impact in relation to climate change, as lack of charging points may mean individuals delay obtaining electric vehicles and continue using fossil fuel powered vehicles and thus contributing to climate change.
- Option 3 (rely on national policy and guidance) presents uncertainty as while national policy (para 112) requires proposals to 'be designed to enable charging of plug-in and other ultra-low emission vehicles', the lack of specificity is likely to result in very varied approaches to satisfying this policy requirement. And, as for option 2, there is potential for negative impact in relation to waste and climate change as retrofitting is likely to result in waste materials and lack of infrastructure may impact upon the transition to electric vehicles.

7.5. Option 1 was preferred over options 2 and 3 because:

- It was anticipated to have positive impact in relation to several sustainability objectives.
- It would further encourage and enable households to use electric vehicles. The increased use of electric vehicles will result in a reduction in the use of petrol and diesel vehicles and thus harmful exhaust emissions: this will result in health benefits associated with 'cleaner' air; and will limit climate change, and potentially adverse impacts on the natural environment.
- The policy requirements support the development of a low carbon economy, as businesses can transition more easily to electric fleet.
- Accessible and plentiful electric vehicle charging points would also improve the areas attraction as a tourist destination for some households.

7.6. Policy option 4- a policy referencing the newly introduced Part S Building Regulations, and setting policy criteria in relation to the location of charging points- was appraised alongside the 3 previous options.

7.7. While policy option 4 scores lower than option 1 overall, the SA scoring of policy option 4 does not reflect the significant positive benefits that will come from the installation of the charging points, as this will result from the enforcement of Building Regulations and would not come as a result of implementation of the policy itself. Rather the scoring of option 4 in the SA reflects the scoring of the locational criteria set out.

7.8. To avoid conflict with and duplication of Building Regulations, Option 4 is therefore the preferred policy approach taken forward in the Proposed Submission Local Plan.

8. Conclusion

8.1. This Evidence Report demonstrates the rationale for the proposed policy as contained in the Proposed Submission Central Lincolnshire Local Plan. This helps bring together relevant evidence that has informed this policy and how we have responded to comments received during the plan making process, as well as how the latest evidence and national guidance has been taken into account.