

## **REA Response: Permitted development rights: supporting temporary recreational campsites, renewable energy and film-making consultation**

The Association for Renewable Energy & Clean Technology (REA) is pleased to submit this response to the above consultation. The REA represents a wide variety of organisations, including generators, project developers, fuel and power suppliers, investors, equipment producers and service providers. Members range in size from major multinationals to sole traders. There are over 500 corporate members of the REA, making it the largest renewable energy trade association in the UK.

The REA EV Forum represents nearly 100 companies operating across the electric vehicle charging infrastructure value chain, from public Charge Point Operators to energy suppliers, eMobility Service Providers, roaming hubs, installers, manufacturers, and financiers. The REA's EV Forum has been active since 2018 and in 2020 the UK Electric Vehicle Supply Equipment Association merged its operations into those of the REA.

### **REA summary of members views of this response**

This consultation response focuses on the key issues of concern to REA members. It does not offer comment on proposals that do not impact the business sectors covered by our membership.

This consultation response therefore focuses on:

- Supporting the installation of solar canopies through the introduction of permitted development rights.
- Ensuring solar canopy installation is far reaching and ensure they support local grid capacity at areas of high demand for EV charging.
- Ensuring the application and installation process is streamlined and applications for new installations are only rejected with good reason.
- Encouraging the Government to work with stakeholders to further consider chargepoint utilisation at popular tourist destinations like Areas of Outstanding Natural Beauty.
- Ensuring solar canopy installation will not impede on safety measures at chargepoints like CCTV cameras which empower some groups like women to charge their vehicle.

## Consultation Questions

### Part 3: Permitted development rights for solar equipment on and within the curtilage of domestic and non-domestic buildings

25. Do you agree that permitted development rights should enable the installation of solar canopies in ground-level off-street car parks in non-domestic settings?

Yes/No/Don't Know. Please give your reasons.

The REA is supportive of permitted development rights enabling the installation of solar canopies.

However, we would further support the installation of solar canopies, where viable, for all car parks. The Government's Energy White Paper in 2020<sup>1</sup> highlighted the significant increase in energy demand we will see by 2030 as a result of EV and heat pump roll out, more than doubling current energy demand. As uptake of EV's rise and the Government look to see 80% of new car sales as EV's in 2030 and 100% in 2035<sup>2</sup> (as it stands) the installation of on-site renewables will become more important to help with local grid capacity. Particularly as the CCC estimate there will be 5.6m EVs on the road in 2025, 15.9m in 2030, and 27.6m in 2035<sup>3</sup>. The REA would encourage the Government to consider the potential for solar canopies across all public car parks rather than only ground level off street car parks to enable the UK to reach its full potential for solar power and the roll out of EV's.

26. Do you agree that a permitted development right for solar canopies should not apply on land which is within 10 metres of the curtilage of a dwellinghouse?

Yes/No/Don't Know. Please give your reasons.

REA is not planning a response to this question.

27. Do you agree that a permitted development right for solar canopies should not apply on land which is in or forms part of a site designated as a scheduled monument or which is within the curtilage of a listed building?

Yes/No/Don't Know. Please give your reasons.

REA is not planning a response to this question.

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<sup>1</sup> <https://www.gov.uk/government/publications/energy-white-paper-powering-our-net-zero-future>

<sup>2</sup>

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1067041/technical-consultation-on-zero-emission-vehicle-mandate-policy-design.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1067041/technical-consultation-on-zero-emission-vehicle-mandate-policy-design.pdf)

<sup>3</sup> <https://www.theccc.org.uk/publication/2022-progress-report-to-parliament/>

28. Do you agree that the permitted development right would not apply to article 2(3) land - which includes conservation areas, Areas of Outstanding Natural Beauty, the Broads, National Parks and World Heritage Sites?

Yes/No/Don't Know. Please give your reasons.

The REA is supportive of preserving the visual landscape of the areas above as this is what makes them so popular to UK residents and tourists every year and provides a significant boost to the local economy in these areas.

However, we would encourage the Government to work with stakeholders in these areas to ensure that these areas are equipped to deal with rising number of EV drivers on UK roads which will see a significant rise in demand for charging infrastructure at these locations.

29. Do you agree that solar canopies should be permitted up to 4 metres in height?

Yes/No/Don't Know. Please give your reasons.

REA is not planning a response to this question.

30. Do you think that the right should allow for prior approval with regard to design, siting, external appearance and impact of glare?

Yes/No/Don't Know. Please give your reasons.

The REA believe that Local Authorities are always best placed to support in the roll out of infrastructure in their constituency. However, we would be cautious of empowering Local Planning Authorities with prior approval as it stands. We would support prior approval for Local Planning Authorities if mandated to provide detailed evidence for their dismissal of any new solar canopies.

31. Are there any other limitations that should apply to a permitted development right for solar canopies to limit potential impacts?

Yes/No/Don't Know. Please give your reasons.

The REA would be supportive of ensuring that solar canopies do not impact on PAS 1899<sup>4</sup> or the Consumer Experience at Public Chargepoints regulations which enable accessibility and safety at public chargepoints. Installation of solar canopies should not obscure CCTV cameras or where they do additional cameras should be installed to enable the public to feel safe when charging their vehicle.

- 32-33. REA is not planning a response to these questions.

#### **Section 4: Providing further flexibility to allow local authorities to undertake development**

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<sup>4</sup> <https://www.bsigroup.com/en-GB/standards/pas-1899/>

34. Do you agree that the permitted development right allowing for development by local authorities should be amended so that the development permitted can also be undertaken by a body acting on behalf of the local authority?

Yes/No/Don't Know. Please give your reasons.

The REA sees significant potential for allowing local authorities to empower charge point operators with the permitted development rights. With the Government launching the Local Electric Vehicle Infrastructure Fund in 2022, providing £450 million in funding for local authorities to roll out charging infrastructure, we see a significant opportunity for this proposed change in planning laws to aid local authorities in fast paced chargepoint rollout.

35. Do you think that any of the proposed changes in relation to the permitted development right could impact on: a) businesses b) local planning authorities c) communities?

REA is not planning a response to this question.

36. Do you think that proposed changes in relation to the permitted development right could give rise to any impacts on people who share a protected characteristic? (Age; Disability; Gender Reassignment; Pregnancy and Maternity; Race; Religion or Belief; Sex; and Sexual Orientation)?

Yes/No/ Don't know. If so, please give your reasons.

Further to our answer to question 31, the roll out of solar canopies, which we strongly support, should not impede on the ability to safely charge an EV. We hope that PAS 1899 and the Consumer Experience Regulations will encourage particularly women to feel safe when charging their vehicle. It is vital that to improve uptake of EV's among women we ensure that adequate CCTV coverage and lighting is available at all public chargepoints.

Research by Keele University into the experience of women at public chargepoints in the UK cited by heycar in their public charging safety campaign highlights how pivotal such safety measures are to improve the experience of women at public chargepoints<sup>5</sup>. Car park owners should ensure that additional CCTV and lighting is installed alongside solar canopies to enable a safe charging experience.

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<sup>5</sup> <https://heycar.co.uk/blog/ev-charging-safety>