

## **Energy Saving Trust's response to the Scottish Government's Review of Permitted Development Rights – Phase 2 Consultation**

**Response submitted 22nd July 2022**

**Q1. Do you agree with the removal of restrictions on Class 9E PDR, for wall-mounted EV charging outlets, in the specified areas currently listed in Class 9E(3)? Please explain your answer.**

EV infrastructure will play a key role in supporting the deployment of EVs in Scotland and as a result in the decarbonisation of road transport. In this context and given that these PDR relate to areas already subject to development we agree that the restriction of these PDR in the areas specified in Class 9E(3) is not justified. Energy Saving Trust therefore agrees with the removal of restrictions on Class 9E PDR, for wall mounted EV charging outlets, in the specified areas currently listed in Class 9E(3).

**Q2. Should the conditions regarding nameplates be withdrawn from Class 9E on wall-mounted EV charging outlets? Please explain your answer.**

In answering this question, it will be important that the Scottish Government considers any potential impacts on the built and natural heritage and on visual amenity against the fact that, as already emphasised in the consultation document, the PDR in question relate to areas already subject to development and the extent to which retaining these conditions is likely to limit the number of charging outlets installed. If withdrawing the conditions is not considered an appropriate way forward, we note that it may, for example, be appropriate to revise them as opposed to withdrawing them all together.

**Q3. Do you agree with the removal of current restrictions on Class 9F PDR for EV charging upstands in the specified areas currently listed in Class 9F(3)? Please explain your answer.**

As noted in our response to question 1 above EV infrastructure will play a key role key role in supporting the deployment of EVs in Scotland and as a result in the decarbonisation of road transport. In this context and given that these PDR relate to areas already subject to development we agree with the removal of current restrictions on Class 9F PDR for EV charging upstands in the specified areas current listed in Class 9F(3).

**Q4. Should the conditions regarding nameplates be withdrawn from Class 9F on EV charging upstands? Please explain your answer.**

In answering this question, it will be important that the Scottish Government considers any potential impacts on the built and natural heritage and on visual amenity against the fact that, as already emphasised in the consultation document, the PDR in question relate to areas already subject to development and the extent to which retaining these conditions is likely to limit the number of charging outlets installed. If withdrawing the conditions is not considered an appropriate way forward, we note that it may, for example, be appropriate to revise them as opposed to withdrawing them all together.

**Q5. Do you agree with the proposed increase in height allowable for EV charging upstands under Class 9F PDR from 1.6 metres to 2.5 metres in all off-street parking locations, except within the curtilage of a dwelling? Please explain your answer.**

Yes, Energy Saving Trust agrees with the proposed increase in height allowable for EV charging upstands under Class 9F PDR from 1.6 metres to 2.5 metres in all off-street parking locations, except within the curtilage of a dwelling. This will help to reduce the barriers to the installation of high power chargers (HPCS) which, as consultation notes require a larger power supply which requires bigger cabinets, and often have separate 'power modules' which also require more space in the cabinet.

**Q6. Do you agree with the proposal to introduce PDR for solar canopies and related battery storage and equipment housing for EV charging upstands in off-street parking areas? Please explain your answer.**

Yes, Energy Saving Trust agrees with the proposal to introduce PDR for solar canopies and related battery storage and equipment housing for EV charging upstands in off-street parking areas. As the consultation document notes this will help to reduce the impact of EV charging on the grid by ensuring that both electricity generated by solar panels and the use of off-peak electricity is maximised.

**Q7. Do you agree with the proposal to introduce PDR for equipment housing for EV charging upstands in off-street areas where solar canopies are not provided? Please explain your answer.**

Yes, Energy Saving Trust agrees with the proposal to introduce PDR for equipment housing for EV charging upstands in off-street areas where solar canopies are not provided.

**Q8. Do you agree with the list of areas within which new PDR for such solar canopies and related battery storage and equipment housing should not apply? Please explain your answer.**

Yes, Energy Saving Trust agrees with the list of areas within which new PDR for such solar canopies and related battery storage and equipment housing should not apply. In order to facilitate the roll out of this type of infrastructure in sympathetic ways it will be important that planning departments take a positive view of the ways in which its visual impacts can be mitigated. The Scottish Government could have a role to play here in terms of co-ordinating both knowledge building and knowledge transfer in this space.

**Q9. Do you agree with the suggested height limit of 4 metres on PDR for solar canopies for EV charging upstands in off-street parking areas? Please explain your answer.**

Yes, Energy Saving Trust agrees with the suggested height limit of 4 metres on PDR for solar canopies for EV charging upstands in off-street parking areas.

**Q10. Do you agree with the proposal that any new PDR for solar canopies, battery storage and equipment housing for EV charging upstands in off-street parking areas should not apply within 5 metres of a road and 10 metres of the curtilage of a dwelling? Please explain your answer.**

No response.

**Q11. Would it be helpful to amend Class 30 PDR for local authorities to make clear they apply to EV charging points and any associated infrastructure? Please explain your answer.**

Yes, Energy Saving Trust thinks that it would be helpful to amend Class 30 PDR for local authorities to make clear they apply to EV charging points and any associated infrastructure. This is because Class 30 PDR for local authorities does not explicitly mention EV charging points and associated infrastructure and as such the applicability of Class 30 to EV infrastructure is not currently clear.

**Q12. Do local authority PDR need to be amended to take account of emerging models for financing, delivering and operating EV charging infrastructure, and the changing nature of private sector involvement? Please explain your answer.**

Yes, Energy Saving Trust thinks that local authority PDR need to be amended to take account of emerging models of financing, delivering and operating EV charging infrastructure, and the changing nature of private sector involvement. This is because, as the consultation document notes, the extent to which the current Class 30 PDR would apply will depend on how the local authority and/or private sector interests deliver and administer the infrastructure.

**Q13. Should PDR for EV charging infrastructure in roads apply to parties other than local authorities? Please explain your answer.**

Yes, Energy Saving Trust thinks that PDR for EV charging infrastructure in roads should apply to parties other than local authorities.

**Q14. If so, would such PDR for other parties need to be linked to some arrangement with local authorities or other form of authorisation? Please explain your answer.**

Yes, we think that such PDR for other parties would need to be linked to some arrangement with local authorities or other form of authorisation in order to ensure co-ordination of activity and reduce the frequency of disruption for in local areas. This could include (but not necessarily be limited to) the examples provided in the consultation – developments which are installed and operated by parties acting on behalf of, or in partnership with, a local authority.

**Q15. What conditions and limitations would need to be placed on any additional PDR for EV charging infrastructure in roads? Please explain your answer.**

No response.

**Q16. In relation to extending PDR for EV charging infrastructure in roads, what issues need to be considered regarding existing PDR, and rights to access the roads network, for infrastructure which are available to other sectors, such as electricity undertakers? Please explain your answer.**

No response.

**Q17. Do you agree in principle with having PDR for changing existing petrol/diesel stations to EV charging only? Please explain your answer.**

Yes, Energy Saving Trust agrees in principle with having PDR for changing existing petrol/diesel stations to EV charging only. As the consultation notes, it is likely that in the future existing petrol/diesel stations might want to convert to EV charging hubs and make best use of existing infrastructure and roadside locations.

**Q18. If so, what, if any, further specification of the conditions and limitations identified, or additional ones, would be required for such? Please explain your answer.**

Energy Saving Trust agrees with the conditions and limitations identified.