

October 2019

## Electric vehicle chargepoints in buildings

### Personal details

Q1. Your name and email address (only used if we need to contact you).

Your name Sarah Greenslade

Your email consultations@britishparking.co.uk

Q2. Are you responding as:

on behalf of an organisation?

### Organisation details

Q3. Your organisation's name is?

British Parking Association

### Building regulation changes: new non-residential and non-residential buildings undergoing major renovation

Q15. Do you agree with our proposed policy position?

Yes

### Existing non-residential buildings

Q17. Do you agree that one chargepoint per existing building with more than 20 car parking spaces is a suitable minimum requirement to transpose the EPBD?

No

### Against existing non-residential building proposal

Q18. Why, noting this is the minimum we must do under the EPBD?

we believe the policy for existing non-residential buildings to have only a minimum of one chargepoint if there are more than 20 parking spaces does not go far enough.

Hospitals and retail outlets can have hundreds, even several thousand parking spaces and the requirement to have a minimum of one would not be sufficient to meet demand. Members have suggested the requirement could be linked to the number of electric vehicles on the road, as it goes up over time. Or, alternatively the policy proposal could increase the requirement so it is more in line with new non-residential buildings and require ten percent of spaces to have chargepoints. For example, see the wording in italics:

*“Existing Non-Residential Buildings: The government proposes a requirement of ten percent of spaces having chargepoints in existing non-residential buildings with more than 20 car parking spaces, applicable from 2025.*

### Existing non-residential buildings: application

Q19. How can the government apply these regulations in a way which balances the benefit to EV drivers and the requirements of the EPBD, with the burden on landowners?

Landowners may need an incentive to install EV chargepoints until the number of EV owners reaches a critical point. Landowners will then see chargepoints as an opportunity to drive customers to their car park.

## Final comments

Q82. Any other comments?

We fully support these government proposals to increase the number of EV chargepoints which we see as a good step change in development planning. However, we believe the policy for existing non-residential buildings to have only a minimum of one chargepoint if there are more than 20 parking spaces does not go far enough.

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We also recommend the government makes funding available for this expansion of infrastructure.

We have encouraged our local authority members to respond directly to the consultation as many of the questions relate to the building control sector involving planning regulations.

One of our members, for example Brighton and Hove Council have had planning regulations in place for a few years that require all new car parks to have chargepoints in 10 percent of bays plus 10 percent passive provision. So ducting etc is already in place should there be a need to expand to 20 percent to meet any increase in demand. They are starting to see the benefit with new retail operations and developments including the required number of charge points.

If the government wants to fully promote the use of EVs, our members believe there needs to be an incentive for landowners to install charging points. The much bigger issue relates to the number of charging points (and particularly fast charging points) that a car park can support without the requirement of a sub-station, costing hundreds of thousands of pounds. However, most landowners see chargepoints as an opportunity to drive customers to their car park. It will undoubtedly help when the number of EVs increases to a critical percentage, for example 15 percent.

One of our members designs multi-storey car parks for clients across the UK. They report that the demand for EV chargepoint installation is being driven by local authority planning regulations currently, some of whom in their experience have policies but many do not. They find it is often impossible to bring the requested number of live charges to the building because the available power is restricted. Even when new sub-stations are installed it can be difficult, as there is still not sufficient power. Without exception, all their clients are not willing to invest a lot of money into EV charging unless they absolutely have to. It appears this is currently being driven by statutory regulations rather than the consumer.