



The draft 2024 NPPF and Other Material Considerations



London Metric - Aldi Ruislip

Proposal for the installation of twelve rapid electric vehicle charging stations and ancillary equipment within the car park of Aldi. Sixteen existing parking spaces will become EV charging bays, including two fully accessible bays.

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1. Introduction

- 1.1 The National Planning Policy Framework (NPPF) is a material consideration in the determination of planning applications.
- 1.2 It is especially powerful where the local planning authority has no policies on electric vehicle charging infrastructure.
- 1.3 On the 30th July 2024 the new Labour Government consulted on a draft new edition of the NPPF. The consultation will run until 24th September 2024 and the resultant NPPF is expected to be published by the end of the year.
- 1.4 The draft NPPF proposes to sweep away a number of amendments made in December 2023 by the previous administration and includes a number of well publicised policy changes.
- 1.5 The accompanying consultation document is clear in stating:

“1. The Government has made clear that sustained economic growth is the only route to improving the prosperity of our country and the living standards of working people. Our approach to delivering this growth will focus on three pillars: stability, investment and reform.

2. Nowhere is decisive reform needed more urgently than in our planning system. [...]

3. Today, we set out specific changes we propose to make immediately to the NPPF following this consultation. These changes – amending the planning framework, and universal, ambitious local plan coverage – are vital to deliver the Government’s commitments to achieve economic growth and build 1.5 million new homes. Specifically, they will: [...]

i. support economic growth in key sectors, aligned with the Government’s industrial strategy and future local growth plans [...]

k. support clean energy and the environment [...]

9. We must grow the economy and support green energy. Commercial development in Britain has been stymied by a lack of support for key growth industries; we propose to support them. Britain has the potential to be a clean energy superpower, cutting bills for local people and businesses alike – we will support this.”

- 1.6 The proposed changes to the NPPF are a clear indication of the new Government’s intentions for the planning system, especially the changes proposed to support the green economy.

2. The Change to New Paragraph 164

- 2.1 Electric vehicle charging infrastructure is low carbon development.

2.2 The proposed new paragraph reads as follows:

164. ~~In determining planning applications Local planning authorities should support planning applications for all forms of renewable and low carbon development. When determining planning applications⁵⁸ for renewable and low carbon these developments, local planning authorities should:~~

a) not require applicants to demonstrate the overall need for renewable or low carbon energy, and give significant weight to the proposal's contribution to renewable energy generation and a net zero future;

2.3 The electrification of the UK's transport system is a key element of the future green economy and achieving net zero.

2.4 The proposed change to new paragraph 164 are a material consideration, stating that significant weight should be given to our chargers' contribution to a net zero future.

2.5 Whilst it will be for the decision maker to consider the weight to be given to the current NPPF, and the proposed changes, the Government is clear on how important these changes are to supporting its objectives, and this signals a high degree of probability to them being formally published in due course.

3. Other Material Considerations Supporting EV Charging Infrastructure

3.1 Electric vehicle charging infrastructure is low carbon development.

3.2 Electric vehicle ownership is at an early stage in its genesis. Ownership rates are increasing as various policy and legislator drivers take effect, chief amongst them net zero targets and the impending ban on the sale of new fossil fuel cars.

3.3 The sector remains a novel one for the planning system with some local authorities starting their policy journeys with limited EV strategies which are focussed on Council-owned land and Council vehicle fleets. Nationally, some local planning authorities have started to include policies requiring some degree of EV charging, often provided as part of wider schemes, in development proposals.

3.4 This is insufficient to deliver the EV charging infrastructure which the Government is clear is needed to support economic growth, meet decarbonisation challenges and promote sustainable transport.

[May 2020 Government Policy Paper ‘Government vision for the rapid chargepoint network in England’](#)

- 3.5 Relevant extracts from the policy paper are set out below (our emphasis in bold):

“As part of the UK’s commitment to end our contribution to climate change, the government is committed to supporting growth of green, zero emission technologies. [...]

*The Rapid Charging Fund was announced in the March 2020 Budget as part of a £500 million commitment for EV charging infrastructure. The purpose of this programme will be to ensure that there is a rapid-charging network ready to meet the long-term consumer demand for electric vehicle chargepoints **ahead of need**. [...]*

By 2030, we expect the network to be extensive and ready for more people to benefit from the switch to electric cars”.

[July 2021 CMA/GOV.UK ‘Electric vehicle charging market study: final report’](#)

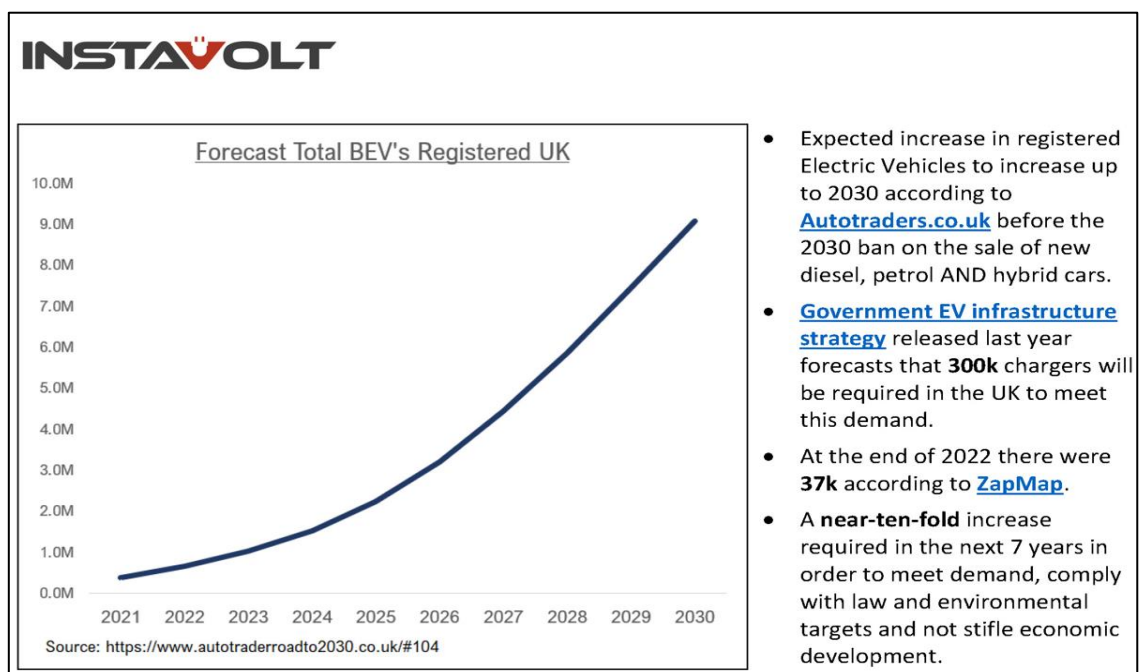
- 3.6 The Competition Market Authority’s report is clear that challenges face the various forms of charging provision. ‘On-street’ which can be undermined by pre-existing parking controls, ‘at home’ which is only currently practical for those with driveways, ‘at work’ which relies on employer support and provision, ‘destination’ which can be patchy and expensive and en-route which is plagued with limited competition meaning quality and reliability can be hampered.
- 3.7 The CMA report clearly states that “**at least 10 times** the current number of charge points are needed by 2030”.
- 3.8 It is also clear that greater provision of fast, rapid, and ultra-rapid chargers is key to instilling consumer confidence in the EV infrastructure roll out, which in turn will spur the necessary transition to electric vehicles for net zero and sustainable transport prerogatives.

[March 2022 Governments Electric Vehicle Infrastructure Strategy entitled ‘Taking charge: the electric vehicle infrastructure strategy’](#)

- 3.9 The Governments Electric Vehicle Infrastructure Strategy entitled ‘Taking charge: the electric vehicle infrastructure strategy’ published in March 2022 is a strong material planning consideration. The strategy pre-dates the development plan and the provisions in the latest

NPPF. The strategy confirms that the Government ‘expect around 300,000 public chargers as a minimum by 2030. Our goal is to ensure these charge points are installed ahead of demand, inspiring confidence in drivers who have not yet made the switch.’ Hence, the current proposal is considered to be an important contribution to help meet this target.

- 3.10 The Government strategy is clear that charge points ‘must also be rolled out where they are needed the most nationwide’. As identified above, this should include areas clearly important for ‘destination’ car parks, especially where there are gaps in the existing limited infrastructure. The strategy goes on to advise that ‘Ultimately, charging your EV should be easier, cheaper and more convenient than refuelling a petrol or diesel car, wherever you live’.
- 3.11 Bearing in mind the nature of the proposed development, reference to the Government’s EV Strategy is conspicuous by its absence in the Officer’s Report, thereby missing an important material consideration.
- 3.12 The following compelling data shows the extent of the challenge to society, to which the planning system is being slow to respond (see page 4 below):



- 3.13 The following extracts from the Government’s EV Strategy convey the urgency of the issue at hand:

- **We need more local engagement, leadership and planning** – local authorities are fundamental to successful chargepoint rollout, particularly for the deployment of widespread on-street charging. They are ideally placed to identify the local charging needs of residents, fleets and visitors. But the current picture is mixed. Some are driving the agenda forward at pace, others are short of dedicated resource and expertise. Planning permission delays are often cited as a major brake on the speed of deployment, and the interaction between local parking and charging policies is not fully resolved.
- **The pace of rollout is too slow** – even the recent surge in chargepoint deployment is not at a pace consistent with what is needed for a wholly zero emission new car fleet in 2035. This is particularly true for local, low power, on-street charging which is so crucial for drivers without driveways. Many fleet drivers also rely on this type of charging. Planning arrangements can be complex to manage. Chargepoint installers can sometimes need multiple permissions, consents and licences, which adds time and cost to deployment.

Delivering a reliable, comprehensive public charging network requires a UK-wide approach

The UK Government has a clear commitment to achieving net zero emissions across the whole country. To achieve this, we need a reliable, comprehensive public charging network across the UK. The vision and principles of this strategy apply throughout the UK, including the importance of increased local leadership. The specific approaches taken may vary, however. Elements of transport policy are devolved, including roads and local transport, strategic planning, land use and public transport subsidies. Energy policy is also devolved in Northern Ireland.

We welcome this report and the recommendations in it have informed our strategy. We are publishing the Government's response to the CMA study alongside this strategy.

Ofgem, the GB regulator for gas and electricity networks, recently set out its own priorities relating to EVs in "Enabling the transition to electric vehicles: The regulator's priorities for a green fair future". These cover electricity network capacity, efficient energy system integration through smart charging, and consumer participation and protection.⁴⁷

Our Vision



Everyone can find and access reliable public chargepoints wherever they live.

We are committed to a comprehensive rollout of charging infrastructure which leaves no area of the country behind. There is huge capacity for the market to meet this challenge and, in areas with higher EV ownership and well-developed local government strategies, local infrastructure delivery is expanding rapidly and the commercial case for private investment is strengthening. However, the pace of rollout across the country is too slow and there is insufficient local leadership and engagement in some places. We are providing local government with the support they need to meet the challenge.

Many areas do not currently have sufficient charging demand to support investment, and local authorities can lack the experience and capacity to develop strategies and apply for funding. The resulting lack of infrastructure can dissuade prospective EV owners, which in turn risks slowing the transition to EVs and leaving some people behind. To ensure all areas

We recognise the current spatial disparities in the provision of EV infrastructure across the UK. When allocating funding, consideration will be given to places that have not previously received funding for EV infrastructure, and those where chargepoint provision is currently low.

We are launching a £10m pilot of the LEVI Fund to provide an early opportunity for local authorities to scale up their local charging provision and maximise the potential for private sector finance. The pilot will test how we can most effectively support local authorities procuring chargepoint deployment by trialling different delivery mechanisms, business models and technologies.

We will be monitoring the level of engagement and planning taking place at the local government level. We will publish information on which local highway authorities have produced strategies for

3.14 The Government is clear in the EV Strategy that it expects the necessary infrastructure to be in place to drive the uptake of EV car ownership in order to decarbonise the transport system

as society heads towards the net zero target in 2050 in orders of magnitude over and above the current provision to provide consumer confidence in all matters, but also competition between operators which the planning system should encourage.

January 2023 Ofgem Electric Vehicle Smart Action Plan

3.15 In January 2023, the Department for Business, Energy & Industrial Strategy, with Ofgem, published the Electric Vehicle Smart Charging Action Plan.

3.16 In relation to the need for the decarbonisation of the UK road transport, the Action Plan states:

“Decarbonisation of road transport is accelerating, and in 2022 one in six of all new vehicles sold in the UK was a plugin electric vehicle. The UK Electric Vehicle Infrastructure Strategy set out how the rollout of charging infrastructure will be integrated into a smart energy system to maximise the efficient use of generation and network assets. Enabling intelligent and automated ‘smart charging’ at suitable locations will deliver a win-win situation; the electricity system costs are reduced lowering prices for everyone, the motorist pays less for charging their electric vehicle (EV), and the electricity powering the EVs is cleaner and greener”.

3.17 In conveying the scale of the challenge and the ‘Public Charging Vision’, the Action Plan makes clear:

“The number of EV charge points will need to be scaled up rapidly through the 2020s. Whilst most drivers will charge at home, those without access to off street parking will rely on public or workplace charging. Government’s EV Infrastructure Strategy defined the vision for the continued roll-out of a world-leading charging infrastructure network across the UK. The strategy emphasises the need for localised charge point planning. Government is considering options for introducing a unified consent process for installing EV charge points, including consideration of a streamlined process for obtaining both the planning permission consent and the highways consent for the traffic management works at the same time. A consultation was held in 2022, and the Government’s response will be published in early 2023 Local EV infrastructure planning must be guided by the high-level system outcomes of achieving a net zero energy system, at lowest investment costs, while meeting the needs of EV drivers and local communities”.

March 2023 Government’s Powering Up Britain

3.18 In March 2023 the UK Government published a suite of documents under the collective title

‘Powering Up Britain’.

3.19 Powering Up Britain is clear that:

“Energy security is one of this Government’s greatest priorities”.

3.20 It goes on to state that:

3.21 *“The energy transition in line with net zero is one of the **greatest economic opportunities** for this country and we are committed to ensuring that the UK takes advantage of its early mover status”.*

3.22 Specific to this proposal, Powering Up Britain is very clear that:

*“The transition to net zero will require **action across the whole economy fuelled by rapid deployment of low carbon electricity**. To thrive, the UK will need to **support the growth of new sectors** and help others adapt”.*

*“The Government will implement the actions set out in the Electric Vehicle Smart Charging Action Plan, published in January 2023. These commitments stretching out to 2026 will maximise the benefits which electric vehicles offer for energy flexibility, and to **make sure the system is ready to respond in time for the upturn in energy demand**”.*

3.23 In relation to the impending upturn in demand Powering Up Britain states:

“Electric Vehicle uptake and infrastructure – In 2022, the UK had the second highest battery electric car sales in Europe, bringing the total number of plug-in vehicles on UK roads to over one million licensed, of which around 60% are battery electric. Charging infrastructure is also speeding ahead: public charging devices have more than tripled from 10,300 devices in January 2019 to over 38,700 in March 2023. We are building on that by publishing a final consultation on an ambitious Zero Emission Vehicle mandate, requiring an increasing percentage of new car and van sales to be zero emission”.

3.24 In terms of the relationship between this emergent technology and economic development (to which the NPPF assigns “significant weight”) and training, Powering Up Britain states:

*“Upskilling the workforce for the green economy – In England, DfE and industry are working together to **train the existing workforce for the net zero transition** through programmes including Skills Bootcamps, Free Courses for Jobs, HTQs and apprenticeships. These programmes are helping to upskill more workers so that they can, for example, support greater energy efficiency in domestic and commercial buildings, and work with green technologies that contribute to the lowering of carbon emissions. **These Skills Bootcamps train***

workers in high demand skills such as electric vehicle charger installation, retrofit, and arboriculture. DfE is continuing to expand Skills Bootcamps, with up to £550 million in funding allocated for financial years 2022-25”.

DfT’s ‘Future of Transport Regulatory Review: zero emission vehicles Government response (Oct 2023)

3.25 The DfT publication continues to extol Government policy on the necessary roll out of EV charging infrastructure. Here are a few standout quotes from it:

*“3.12 It is **critical that infrastructure is delivered at pace in all local areas**”.*

“3.13 In order to plan and ensure provision of sufficient charging infrastructure most respondents thought that resource funding for local authorities, training for officers and grid upgrades were most needed”.

*“4.1 The development of off-street charging infrastructure is **necessary to support the transition to EVs**. We are aware that **limited access to charge points, especially off-street home or destination charging, can cause ‘charging anxiety’ which hinders EV uptake**.*

*“6.1 A **positive consumer experience is essential to increasing public engagement and overall confidence in EV charging**. As the transition to EVs accelerates and the charging network expands and evolves, it is critical that regulatory arrangements keep step with consumer needs”.*


*“6.22 **Consumers should feel confident that there is a high-quality, consistent minimum level of service across the charging sector**”.*

*“6.3 As the EV transition gathers pace, it is **essential that charging infrastructure meets the needs of all consumers**. Based on previous consultation, user research and other emerging evidence, we know that various aspects of charging infrastructure design can present challenges to some EV consumers. We want to ensure that those with mobility, dexterity, or other impairments can easily locate and access charging infrastructure suitable for their needs. In addition, all consumers should feel safe while charging at any time of day”.*

“6.31 Several respondents noted that consumers should feel as safe charging an EV as they do refuelling at petrol forecourts. Respondents commonly identified lighting, CCTV, clear signage, shelter, proximity to amenities and choice of location as examples of elements we should consider mandating. Several emphasised that new safety requirements would improve confidence among female drivers, who they noted may feel particularly vulnerable charging

in dark, isolated locations”.

[Pathway to ZEV Transition](#)

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News story

Pathway for zero emission vehicle transition by 2035 becomes law

80% of new cars and 70% of new vans sold in Great Britain will now be zero emission by 2030, increasing to 100% by 2035.

From: [Department for Transport](#), [Office for Zero Emission Vehicles](#) and [Anthony Browne](#)

Published 3 January 2024

3.26

- the zero emission vehicle mandate, the government’s pathway towards all new cars and vans being zero emission by 2035, is now law
- new regulations are backed by over £2 billion already invested by government to expand charging infrastructure and incentivise zero emission vehicles
- the mandate provides certainty to support the economy, industry and families, and is the largest carbon saving measure in government’s net zero strategy

The UK now has the most ambitious regulatory framework for the switch to electric vehicles of any country in the world, thanks to new laws which commenced today (3 January 2024). Following extensive consultation with industry and manufacturers, the mandate provides them with the certainty they have called for to safeguard skilled British jobs.

Technology and Decarbonisation Minister Anthony Browne will visit a new bp pulse hub in London today to mark the occasion, where he will see their ultra-fast EV chargers in action and meet drivers who are benefiting from the facility.

The zero emission vehicle (ZEV) mandate sets out the percentage of new zero emission cars and vans manufacturers will be required to produce each year up to 2030. 80% of new cars and 70% of new vans sold in Great Britain will now be zero emission by 2030, increasing to 100% by 2035.

WHAT THE NEW LABOUR GOVERNMENT MEANS FOR AUTOMOTIVE AND EV INDUSTRIES

18 JUL 2024

Key Drivers:

Labour aims to reinstate the 2030 ban on sales of new ICE cars, driving the expansion of the EV industry and supporting the development and adoption of electric vehicles.

Labour pledges substantial investments in EV infrastructure, including more public charging points and rapid charging hubs, to alleviate range anxiety and encourage EV adoption.

Labour plans to introduce or enhance incentives for EV adoption and fleet electrification, such as tax breaks, grants, and subsidies, to reduce financial barriers and increase uptake.

Labour commits to strengthening the automotive industry by increasing battery factories, improving supply chains, creating jobs, and investing in research and development for EV technology.

It was a huge part of Labour's campaign messaging, so now they've secured their position in power, what does Labour's [pledge](#) to the EV sector mean for the automotive industry?

Labour's stance on Net Zero

When Sunak announced that the 2030 target to end sales of new petrol and diesel cars and vans [ZEV mandate](#) target would be [pushed back to 2035](#), [\[PC1\]](#) it showed a significant lack of strategy to support EV sales to meet the ZEV [mandate's targets](#) [\[PC2\]](#) within the Conservative government.

As a point of reference, the Zero Emission Vehicle (ZEV) mandate specifies the proportion of new zero-emission cars and vans that manufacturers must produce annually until 2030. By 2023, 80% of new cars and 70% of new vans sold in Great Britain will be zero-emission, with this target rising to 100% by 2035.

So, it's fully understandable that, when Sunak announced the push back, itThis was a cause for concern for many in the EV industry, as the mixed messaging messed manufacturers around and signalled to consumers that they didn't need to switch to EVs as quickly, hence the downturn in EV sales, as out of the 7 million used cars sold or exchanged in 2023, only 120,000 were EVs.

In Labour's [automotive strategy](#), Shadow Secretary of State for Business and Industrial Strategy, Jonathan Reynolds had this to say about it:

"The manner in which the UK automotive sector has been treated by the Conservative government is entirely unacceptable. Worse still, the decision to water down the 2030 phase out of petrol and diesel vehicles is a huge setback for manufacturers who will have spent enormous amounts of money and time on the basis of these targets. Chopping and changing like this in government policy completely undermines the investment prospects for the sector."

Now, compare this to Labour's commitment to achieving net zero emissions, and suddenly it appears the EV topic is back and high on the agenda, especially as it is central to Labour's environmental strategy.

Progress on the electric vehicle transition

Electric vehicles (EVs) could help the UK decarbonise its transport sector and meet its net zero commitment. The number of electric cars on the roads is growing, while progress has been slower for electric vans and lorries. A range of barriers to demand persist include their upfront cost, access to chargepoints, and general consumer scepticism.

3.27

Charging infrastructure

In 2024 the Lords Environment and Climate Change Committee identified poor access to reliable charging as another key barrier to potential EV buyers. Concerns over charging infrastructure was also identified as a barrier in the 2023 Auto Trader survey.⁷⁶

The Lords committee called for the government to increase the pace of EV chargepoint installation to help the private sector, especially where chargepoints might not be commercially viable. It called for the government to review “outdated and disproportionate planning regulations which are a major block to the rollout”, create legislation to direct local authorities (LAs) who are making insufficient progress on rollout, and remove delays to LA funding for chargepoints.⁷⁷

3.28

National Planning Policy Framework December 2023

3.29 NPPF Paragraphs as follows (our emphasis):

3.30 Paragraph 7 is clear in stating:

“The purpose of the planning system is to contribute to the achievement of sustainable development”.

3.31 Paragraph 8 states:

“Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):

a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;

b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being; and

c) an environmental objective – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy”.

3.32 Paragraph 9 is clear in its expectations that:

*“**These objectives should be delivered through** the preparation and implementation of plans and **the application of the policies in this Framework**; they are not criteria against which every decision can or should be judged. Planning policies and decisions should play an active role in **guiding development towards sustainable solutions**, but in doing so should take local circumstances into account, to reflect the character, needs and opportunities of each area”.*

3.33 The NPPF employs a presumption in favour of sustainable development. Development which complies with the development plan is sustainable by default. EV vehicles require access to well-located public charging infrastructure in all areas, inside and outside of settlement boundaries. This development satisfies an operational need for EV vehicles to recharge when navigating in, out and through the district and therein supports other societal priorities including economic development, tourism and transport decarbonisation.

3.34 Section 9 of the NPPF is entitled “*Promoting Sustainable Transport*”.

3.35 The NPPF glossary defines sustainable transport as “*Any efficient, safe and accessible means of transport with overall low impact on the environment, including walking and cycling, **ultra low and zero emission vehicles***”.

3.36 The NPPF glossary defines low carbon technologies as “*Low carbon technologies are those that can help reduce emissions (compared to conventional use of fossil fuels)*”.

- 3.37 Public EV charging infrastructure is required to support the transition to a low-carbon economy and a decarbonised transport system.
- 3.38 Paragraph 87 builds on paragraph 109 and states *“Planning policies and **decisions should recognise and address the specific locational requirements of different sectors. This includes making provision for clusters or networks of knowledge and data-driven, creative or high technology industries; and for storage and distribution operations at a variety of scales and in suitably accessible locations**”*.
- 3.39 EV charging infrastructure is required in all areas; town, country, urban etc. but crucially where the appropriate grid infrastructure and capacity is at hand (as it is in this case) and that is the locational requirement to which the NPPF refers.
- 3.40 Paragraph 85 Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. **Significant weight** should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future.
- 3.41 Paragraph 108 states:
- “Transport issues should be considered from the earliest stages of plan-making **and development proposals**, so that:*
- a) the potential impacts of development on transport networks can be addressed;*
 - b) **opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised** – for example in relation to the scale, location or density of development that can be accommodated;*
 - c) opportunities to promote walking, cycling and public transport use are identified and pursued;*
 - d) **the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account** – including appropriate opportunities for avoiding and mitigating any adverse effects, **and for net environmental gains**; and*
 - e) patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places”*.
- 3.42 Paragraph 109 states: *“The planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are*

*or can be made sustainable, through limiting the need to travel and **offering a genuine choice of transport modes**¹. This can help to reduce congestion and emissions, and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making”.*

3.43 Paragraph 157 states *“The planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and **support renewable and low carbon energy and associated infrastructure**”.*

3.44 This planning application includes both EV charging infrastructure and renewable energy generation and storage; it is both renewable and low carbon development.

3.45 Paragraph 163 is very clear on how the Council should be approaching what is inherently a sustainable development from any angle:

*“When determining planning applications for renewable **and low carbon development**, local planning authorities should: **a) not require applicants to demonstrate the overall need [...]** and **b) approve the application if its impacts are (or can be made) acceptable**”.*

3.46 Whilst we consider that any minimal impacts from this sustainable development are or can be made acceptable. This is a low carbon development, and the decision makers’ focus and effort should be on working with the applicant at the earliest possible stage to reduce any impacts to acceptable levels so that it can go ahead.

3.47 Paragraphs 189 to 194 are clear on the need to reduce emissions and pollutants, for human health and environmental gain.

Additional Considerations

3.48 Alongside numerous Government strategies and objectives, the following will provide serious challenges to vehicle and fleet owners and the wider economy if the necessary charging infrastructure is not in place to meet demand which is already surging:

- 2030 – following the previous Government target of 2030 for a ban on the sale of new

¹ NPPF glossary defines sustainable transport modes as including ultra low and zero emissions vehicles.

fossil fuel cars, car manufactures will have phased out new fossil fuel cars from their forecourts in any event and following industry targets that were based on the 2030 date.

- 2035 - the UK is heading towards a Government ban on the sale of new petrol and diesel cars in the UK.
- The 2050 Net Zero requirements.
- The 2023 Highway Code change that will see motorists fined £100 if they run out of fuel (including EV cars) and obstruct traffic as a result.

3.49 There is a real economic urgency to proposals such as this. Demand is already outstripping supply because the roll out of EV infrastructure has been too slow according to the Government's EV Strategy.

3.50 To understand how the prevalence of EV charging points nationwide, in both urban and rural areas, will affect the wider economy, decision makers only need think of the impact caused by 'traditional' fuel shortages; the queues of vehicles, impacts to business, impacts to society, food distribution etc.

3.51 If after 2030 the necessary EV infrastructure is not in place to support an increasingly EV-dominated private, commercial, and Council vehicle fleet then serious economic damage will be done to the country's economy – quite the opposite to the significant weight to be given in support of economic development which NPPF paragraph 85 is very clear on.