

Planning Committee

16 January 2026

Agenda item number 10

Consultation responses

Report by Planning Policy Officer

Summary

This report informs the Committee of the officer's proposed response to planning policy consultations received recently, and invites members' comments and guidance.

Recommendation

To note the report and endorse the nature of the proposed response.

1. Introduction

- 1.1. Appendix 1 shows selected planning policy consultation documents received by the Authority since the last Planning Committee meeting, together with the officer's proposed response.
- 1.2. The Committee's comments, guidance and endorsement are invited.

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Date of report: 15 December 2025

Appendix 1 – [Acle Neighbourhood Plan](#)

Appendix 2 – [Reforms to the statutory consultee system](#)

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Appendix 1 – Acle Neighbourhood Plan

Acle Parish Council

Document: [Acle Neighbourhood Plan \(acleparishcouncil.gov.uk\)](http://acleparishcouncil.gov.uk)

Due date: 16 January 2026

Status: Regulation 14

Proposed level: Planning Committee endorsed

Notes

The first Acle Neighbourhood Plan was ‘made’ (adopted) in February 2015 following a YES vote at a referendum held in January 2015. The Acle Neighbourhood Plan has been used by Broadland District Council and the Broads Authority to determine planning applications and Acle Parish Council has used it to help formulate its response to planning applications within the parish.

10 years have elapsed since the Plan was made, and there have been numerous changes in the national and local planning policy context. These include a change in national government, several revisions of the National Planning Policy Framework (NPPF), changes in environmental legislation and the adoption of a new Local Plan for the Greater Norwich Area (GNLP). Change on the ground has also been evident with 267 new dwellings built in the parish between 2014 and 2023.

Further development is planned through the allocations in the new Local Plan, between Norwich Road and South Walsham Road, and permission granted in October 2025 for 200 dwellings and 90 retirement apartments on land south of Leffins Lane.

Acle Parish Council has embarked on a review of its Neighbourhood Plan, to ensure it is up to date and in a strong position to influence the future development of the village.

Proposed response

Summary of response

The review of the plan is welcomed. There are many detailed comments proposed on the suite of documents out for consultation. There are two objections to the Neighbourhood Plan.

Neighbourhood Plan

- Preface, para 3 – in that ten years, the Local Plan for the Broads was adopted – 2019
- Preface, para 4 – which Local Plan? There are two relevant to Acle.
- Page 4, last para: The Neighbourhood Plan does **not** allocate any land for new housing development above that already identified in the Local Plan.
- Page 6, 1.2 – is it better to say subtly?
- Page 7, para 1.6 – refer to the Local Plan for the Broads.
- Figure 2 and Figure 5 – show the Broads.
- Point 2.9 ‘provide open space to reduce leisure visits to the Broads;’ – does this target any specific users such as dog walks, i.e. creating a dog walking meadow which would alleviate impact on sensitive areas (regarding dog presence impact on wildlife). Otherwise, nearby

Broads visitor spots such as Salhouse, Acle, Ranworth, South Walsham would all benefit from regular visitors.

- 2.12 and 2.13, Figure 4 – the correct references in the adopted Local Plan for the Broads is ACL1 and ACL2.
- Figure 4 – this is not the adopted policies maps. Please use the adopted policies maps.
- Section 2 – might want to say that the Local Plan for the Broads is being reviewed, but the two allocations at ACL1 and ACL2 are being rolled forward.
- 3.8, page 17 – you might want to refer to this: [The Local Deprivation Explorer: Making deprivation data easier to find, understand and use – MHCLG Digital](#) which was released in 2025.
- Figure 8 is a bit blurry
- Table on page 25 and 26 – the new ones in green don't have a summary paragraph.
- Figure 13 – it is not clear what the numbers are...
- Para 6.7 – there is an adopted design code/guide for the Broads and this needs to be referred to.
- Para 6.9 – has it been influenced by the Broads Design Guide/Code? That is not mentioned.
- Policy ACLE1 – should it be ...'Acle's context...'?
- Policy ACLE1 1, iii – 'maintain - as a minimum a 5m gap between dwellings to minimise overlooking and prioritise amenity space' – the dash does not really help things. Maybe a couple of , are needed?
- Policy ACLE1 – 5m gap between dwellings – is that really an efficient use of space? I would suggest this criterion needs clarifying or elaborating and double checking. As written, there is a house, then a gap that is similar to the width of a house, and then another house and so on. That does not imply efficient use of land. That implies that all dwellings need to be detached – is that the aim of it? A 5m gap between new dwellings is quite a lot. Does this depend on its location? For example, in the village centre, there is a denser form of development, with buildings in closer proximity to one another and so a 5m gap between buildings in some places may look incongruous.
- Policy ACLE1 – GV/02 – the title is 'Sustainable Drainage Schemes (SuDs) and fire prevention', but the topics covered also include connectivity, legibility and wayfinding, traffic calming etc- I see the reference goes from GV to CV and I wonder if the formatting is wrong and 'connectivity' should be a title?
- Page 32 GV.01 xi) is it just existing development that fronts or backs onto ponds, wetlands or swales that must take every effort to mitigate flooding or all existing and proposed development in all locations? The issue of flooding is not just caused by over-topping from waterbodies.
- Page 32 GV.01 xi) this code should perhaps emphasise more the need for blue and green networks to connect with existing blue and green infrastructure to create new and consolidate existing networks.
- Page 32 GV.02 Sustainable Drainage Schemes and fire prevention. Should these be two separate policies? SUDS and fire protection don't seem to be intrinsically linked in anyway.
- Page 33 CV. 01.2 Legibility and wayfinding – could this be reworded to something along the lines of: 'Streets **should** contribute to the character of the area, taking into consideration features such as active frontages, enclosure and high-quality landscaping. Pedestrian routes should be furnished and integrated into the existing street network.'

Wayfinding could be aided by appropriate signage, for example, timber signage in the countryside being mindful not to create unnecessary visual clutter. ‘

- Page 33 CV.01.5 materials should also be a consideration? Timber preference?
- Do you need to copy over all the design guide/code if you append it to the Neighbourhood Plan?
- Throughout – spacing between words varies.
- Policy ACLE2 – is there an ‘and’ missing: ‘The focus for new development in Acle over the plan period will be within the adopted settlement limit (figure 14) **and** within specific allocations made in the Greater Norwich Local Plan’.
- Policy ACLE2 – ‘Size: where new housing is to be provided, the focus should be on mid-sized 3 bedroomed dwellings, as both affordable and open market dwellings, **which retains the current range and mix of housing available and maintains a balanced and inclusive community**’. The bit highlighted seems justification and does not link to the policy. Perhaps the link is ‘**as this** retains’? Is it needed in the policy?
- Footnote 14 – major development also has a land area limit. So you might want to refer to that in the footnote, rather than just referring to the number of dwellings.

Objection – ACLE2

- 6.14 says ‘New ‘windfall’ housing development should be located inside the adopted settlement limit for the village, close to existing development and within easy reach of the village centre, where good access to local facilities can be achieved’. By virtue of being inside the adopted settlement limit, the other two things are addressed. Or are you saying that the other two things (easy reach of village centre and good access to local facilities) mean that development can be outside the settlement limit if they meet those criteria? The inclusion of all three is not clear.
- Policy ACLE2 – similar to previous comment on location of dwellings, what does para 2 of the ACLE2 add if all new dwellings are directed to the settlement limit? Is para 2 adding another set of locational criteria? So dwellings don’t need to be in settlement limits if they meet para 2 of the policy? This is confusing and needs clarification.
- If you are introducing different locational criteria for development and allowing it outside of the development boundary, the Broads Authority objects as this is contrary to local and national policy.
- 6.21 first sentence is a bit clumsy ‘Parking provision for developments in Broadland should be made in order to satisfy the relevant adopted standards of Norfolk County Council as Highway Authority’. I think you are saying that Norfolk County Council has parking standards. But what is written does not really say that well. This is also talked about in 6.25 a bit more clearly.
- 6.22 & ACLE 3 on electric vehicle charging – isn’t this mandatory in the Building Regs now?
- Policy ACLE3: The design section strays into the design of roads: ‘Road design should include a clear demarcation between highway and footways and should not include shared surfaces’.
- Policy ACLE3: Parking provision – you defer to NCC standards but then include standards in the policy. Are these repeating NCC standards or different parking standards?
- 7.2 says ‘This in turn means that the village centre is largely unsuitable for active retail and leisure uses which spill out onto the pavement and create active frontages and a vibrant atmosphere’. So do the uses spill out onto the pavement or do they not spill out onto the

pavement? If they don't, should it be 'which **could**'? It is not clear what the situation is versus what you want to happen.

- 7.5 'still very important **to** the community'.
- Page 46-47 Policy ACLE6 Acle Bridge Improvements: Should this also reference the need to consider the setting of the WW2 heritage at Acle bridge and potentially provide some heritage interpretation about the heritage significance of this area? See Norfolk Heritage Explorer (HER)
- Section 9 – recommend that developers are required to refer to the County LCWIP and the Broads LCWIP – particularly as the County one has a specific reference to Acle and supports the policies relating to Acle Bridge and the improvement of the town centre.
- Section 9 – Reference to LTN1/20 and upcoming ATE Rural Design Guide would be beneficial to ensure high quality design.
- Section 9 should reflect the Broads Local Plan Peat Policy.
- 9.1 as this is a planning document, best not to say 'Broads National Park' – just say the Broads
- 9.3 but also for ~~realistic~~ routes that can realistically be used for commuting to work or school.
- 9.3 Include phrasing 'Active Travel' Cycling, wheeling (to encompass wheelchairs, pushchairs, wheeled mobility aids) – using the term 'wheeling' incorporates the idea of pushchairs and wheeled mobility assistance and is being commonly used.
- Policy ACLE9: says 'Pedestrian and cycle connections should be provided, both within the site, and also linking the site to the existing network to create continuous footway links, in particular where these link to schools, public transport, community facilities and recreational spaces'. The first part is about pedestrians and cycles and then the second part just talks about footways which can only be used by pedestrians and wheelchairs. Perhaps rather than footways, in order to capture pedestrians and cyclists, say 'continuous walking, wheeling and cycling **links**' or similar?
- Pavement versus footway, throughout the document. If you are referring to the provision that runs next to a road, it is a footway. You might want to be consistent throughout.
- Figure 20 does not seem to show all the new routes and connections set out in the policy ACLE9. What is Figure 20 showing in relation to what the policy says?
- Page 67, para 10.28 – It is noted a list of important trees and hedges that should be protected is provided at Appendix D. It should be stated that this is not a conclusive list and people should check that their trees are not protected by a TPO or being within a conservation area (as these things may change).
- 10.3 are located and it **is** important that new
- 10.6 – should be Lead Local Flood Authority
- Policy ACLE11 – should the policy start with new lighting of any type needing to be justified in the first place?
- Policy ACLE11 – what about light spill from large glazed areas?
- Para 10.16 may need to be split up. The first part talks about marshland. Then the second part about green verges – green verges part may be lost in there.
- 10.19 – please add that for developments within the Broads, the policies of the relevant district are deferred to in terms of provision of new open space.

- Page 63, section on biodiversity. It would seem logical to refer to the Local Nature Recovery Strategy that is now adopted and in place. 10.29 touches upon it, but the LNRS is now adopted.

Objection

- Policy ACLE13 – are i : ix shown on a map anywhere? If it is Figure 31, Figure 31 is not annotated as such.
- Policy ACLE13 uses terms ‘net gain for biodiversity’, ‘net gain’, ‘biodiversity net gain’ – if these all mean the same thing then the same term needs to be used and that should be biodiversity net gain.
- Policy ACLE13, para starting ‘Priorities for Biodiversity Net Gain and...’ – how does this relate to the LNRS?
- Policy ACL13 says ‘Any development site which contains tree belts should facilitate access to and through them with footpaths and cycleways, as appropriate, for both wildlife and people to connect with open spaces, the Broads and the surrounding countryside, wherever possible, in order to maintain and enhance the rural character’. This may need to be caveated as such routes could result in more people going to protected sites. So care is needed with this wording. The policy may need to say ‘subject to the findings of a project level HRA’ or the like.
- 10.42 – this refers to Written Ministerial Statement 2015 – this was updated by WMS 2023 - [Written statements - Written questions, answers and statements - UK Parliament](#)
- 10.43, 11.15 - local planning authorities.
- Page 81 Policy ACLE15 – b) As well as large scale energy developments not being located *within* the Broads Authority Executive Area, this should also include that any large scale energy development should not impact on the *setting* of the Broads.
- Page 85, para 10.54 and 10.55 – the approach set out to NDHA’s is unconventional but is probably acceptable on balance. However, I would suggest that at the end of 10.55 it states that buildings falling into the categories above and meeting some set criteria to be included as an appendix or in this paragraph. It could be the criteria set out by Norfolk County Council’s Historic Environment team or meeting say 4 of the criteria listed on page 11 of [Historic England’s guidance](#).
- Page 86 – Figure 52: the building shown (The Limes) is not a Victorian or Edwardian villa as described and is actually grade II listed – [see here](#). A photo of another building should be provided.
- Page 89 – Policy ACLE16 0 non-designated heritage assets – As well as falling into the categories listed the buildings should also meet a specified number of the criteria identified by HE / NCC (as per comment on age 85 above).
- Also Policy ACLE 16 – need to make clear this is referring to Halvergate **Marshes** Conservation Area, as there is also Halvergate Conservation Area covering the village of Halvergate and Tunstall. The wrong conservation area is referred to three times at present.
- 11.1 – does this new Neighbourhood Plan replace the current one? Is that stated anywhere? This paragraph, as written, could imply that both are in place.
- As LPAs who will use this Plan, what are we meant to do with Appendix D? Should these be plotted on a map?

Design Guide and Code

2.3.1 – are there peak hour services for buses and rail? This needs to be clarified.

Figure 21 and page 22, middle column, bottom para is as the crow flies and is not a realistic representation of what can be reached by foot and cycle. This needs to be replaced with an assessment of what is within those distances, using the routes a cyclist or pedestrian will take.

Page 10 – it is noted that BDC's LCA is referenced on page 9 so should the BA's LCA be referenced on page 10?

Page 19, Figure 15 – it would be good to have a bit more differentiation in colour between Watercourses and flood zones on this map.

Page 29, first column, last para says: 'It is important to note that many household extensions are protected under Permitted Development (PD) and so do not require planning permission'. I don't think they are protected – I think they are permitted?

Page 31 and Figure 27 This doesn't show or mention the fire break that is required by the Policy in the NP. It might be good to be able to show how the design of this could be successfully integrated into development and the wider landscape.

Page 32 RV.01.3 as per comment above on P31 of the NP – would they be expect a 5m gap between buildings in all cases – eg on an infill site in the village centre where there is a denser form of development?

Page 32, point ii – similar to comment on Plan itself. 5m is the width of a dwelling. So are all developments in Acle to be detached?

Page 33 – a number of the different building types shown in the diagrams do not have the 5m gap between houses .

Page 38 – in the example provided chimneys also add to the varied roofline but are not mentioned in the text. Add something about the contribution of chimney stacks to the roofline, especially in the historic parts of the village.

Page 39 – is the brick wall in the bottom right corner really a poor example. On a new development, realistically the other alternative is a close-boarded fence, because the developers and new owners will want a quick means of providing a private space for a rear garden. A brick wall is far more appropriate than a 2m close-boarded fence.

Page 40 – GV.01.2 ii) is it just existing development that fronts or backs onto ponds, wetlands or swales that must take every effort to mitigate flooding or all existing and proposed development in all locations? The issue of flooding is not just caused by over-topping from waterbodies.

Throughout – you refer to the Design code for South Norfolk and Broadland at the top of some pages, but not the Design Code for the Broads Authority.

Page 43, GV.01.3 Biodiversity. ii – what is a low garden?

Page 44, orange box says to use SuDS where possible. This casual wording seems inconsistent with the NPPF, particularly para 181 part c.

Page 47, orange box, i – the order seems to imply that motor vehicles are most important.

Page 47 – blue box, iii – when you say footpaths in this context, do you mean public rights of way? Or do you mean footways that run alongside roads? If footway, then isn't it a must? If footpaths, then maybe say public rights of way?

Page 47, blue box iv – why is cycle parking a 'should'? There will be parking standards either in the Broadland Local Plan or Norfolk County Council's parking standards.

Page 48, blue box, i and ii – why are these shoulds? They seem fundamental things to address.

Page 49, blue box, v – what about the potential for verge parking?

Page 50CV.01.4 iii) Its not correct to say that TPO'd trees can be removed if they are a hazard to pedestrians. They can be removed if they are dead or dangerous (not just to pedestrians) but the LPA should still be contacted to confirm the process.

Page 52 – orange box – this needs to say that any lighting needs to be fully justified in the first place. What is written does not really match the dark sky stance of the Neighbourhood Plan.

Page 52, blue box – iii, iv, v, vi – why are these shoulds? These need to be musts. What is written does not really match the dark sky stance of the Neighbourhood Plan.

Page 53 CV.02 parking design – there is nothing about EV charging and cycle parking and scooter parking.

Data profile

Page 17, 18, 19, 20, 21 – this policy is not adopted. The adopted policy and policies map are in the adopted Local Plan.

Some data is from August 2024 or earlier.

Flood risk data from the EA was updated earlier this year.

Statement to accompany pre-submission version, November 2025

We disagree with the conclusion that 'Acle Parish Council as the qualifying body under the Neighbourhood Plan Regulations, does not believe that the modifications to existing policies nor the introduction of new policies are so significant or substantial as to change the nature of the neighbourhood development plan which the modification proposal would modify'. This is because the Design Guide is new and a significant change and some policies have been deleted and merged and widened.

Appendix 2 – Reforms to the statutory consultee system

Ministry of Housing, Communities & Local Government

Document: [Reforms to the statutory consultee system - GOV.UK](#)

Due date: 13 January 2026

Status: Government consultation

Proposed level: For information as deadline before Committee meeting

Notes

The number of statutory consultees, and the nature of statutory consultation, has evolved over time. New statutory consultees have often been added in response to shifting policy priorities, but without any subsequent review of whether their ongoing involvement remains necessary or proportionate.

As a result, some bodies have remained statutory consultees without systematic reassessment, despite broader changes to policy and context. This has led to an inconsistent and potentially outdated approach to statutory consultation.

As set out in the written ministerial statement of 10 March 2025, we are consulting on proposals to remove Sport England, The Gardens Trust, and Theatres Trust as statutory consultees, and testing the impact that this would have.

Proposed response

Question 1 Are there other key areas we should be considering in relation to improving the performance of statutory consultees?

Stronger guidance on “When” they should be contacted

Question 2 In exploring reforms to the system, we have so far focussed more on key national statutory consultees. Is there more that government should do in relation to smaller scale and local statutory consultees?

NSIPs- some tighter control on who is consulted as LPAs 100s of miles away could be consulted.

Question 3 In light of the proposed mitigations, do you support the removal of Sport England as a statutory consultee?

Neutral

Currently, the Planning Officer makes a judgement as to whether to consult Sport England. So even though they are currently a statutory consultee, they are not consulted on every issue. In our experience, we are not aware of any issues caused by consulting Sport England in planning applications. Generally, it is more about what is said in response to planning applications,

rather than who says it. If there is a valid point made, by anyone, then it is considered in determining the application.

In terms of Local Plan making, they are on the consultation database and when there is a Local Plan consultation, the notification is sent to everyone on that database. When we have had comments from Sport England, in relation to the Local Plan, we have found them timely and useful. Similarly to comments made on planning applications, it is about what is said rather than who says it. No issues have been caused by consulting Sport England on the Local Plan.

If Sport England are removed as a statutory consultee, in terms of Local Plan making, we will continue to consult them and react and respond to their comments as we see fit. In terms of planning applications, we would consult in line with any requirements set but see response to Question 4.

Question 4: In relation to notification requirements, should substantial loss of an existing playing field be defined as:

An alternative approach

Any proposal for the loss of playing fields or any amount of playing fields needs to be sent to Sport England for comment. Sports fields are used for informal and formal play. We all know people who go to them for a knock about or kick about with friends, run around them or are part of teams that train through the week and then play matches on weekends. We see the benefits to mental health and wellbeing as well as benefits to the local economy.

As per our adopted policy:

Policy DM7: Open space on land, play space, sports fields and allotments

a) Existing Provision (See open space map bundle and various Inset Maps)

Development that would result in the loss of existing sport, recreational, allotment or amenity open space as identified on the policies maps and identified by the Authority's constituent district councils in their evidence base will only be permitted if it can be demonstrated (through a local assessment) that:

- i) There is an excess of recreational or amenity open space in the catchment area (in and out of the Broads) and the proposed loss will not result in a current or likely shortfall during the plan period; or*
- ii) The proposal is for ancillary development on an appropriate portion of the open space which enhances the recreational facilities and their setting; or*
- iii) The open space which would be lost as a result of the proposed development would be replaced prior to the commencement of the development by an open space of equivalent or better quality and equivalent or greater quantity, in an equally accessible and convenient location subject to equivalent or better management arrangements which continue to meet the needs of the existing community; and*

- iv) *The proposal would not cause significant harm to the amenity or biodiversity value of the open space*

So it is more about the impacts of losing any sports field and then what is going to be done about it, rather than a nominal % figure.

Question 5: Are there impacts of the removal of Sport England as a statutory consultee, or the proposed mitigations, that you think the government should take into account in making a final decision?

See answers to related questions.

Question 6: In light of the proposed mitigations, do you support the proposals to remove The Gardens Trust as a statutory consultee?

Support the proposed removal of the Gardens Trust as a statutory consultee as long as the proposed mitigations are put in place and Historic England are adequately resourced to provide landscape advice on development affecting Registered Parks and Gardens.

Question 8 In light of the proposed mitigations, do you support the removal of Theatres Trust as a statutory consultee?

support the proposed removal of the Theatre's Trust as a statutory consultee as long as the proposed mitigations are put in place.

Question 11: Do you support the proposed changes to National Highways' referral criteria?

Yes

Question 13: Do you support the changes to Active Travel England's proposed referral criteria?

Yes

Question 17: Do you support the changes to Historic England's proposed notification criteria?

Agree with the proposals to change the notification requirements for HE, although LPAs will need to be adequately resourced to provide sufficient design and heritage advice on larger developments within conservation areas.

Question 19: Is there anything else we should consider in relation to the role of Historic England as a statutory consultee?

Ensuring advice on when to consult is widely published.

Question 26: Do you have suggestions for how government can effectively incorporate appropriate developer and local authority feedback into consideration of statutory consultee performance?

Developers & LPA should be encouraged to report inconsistencies on advice, rather than just taking it as it comes.

Question 30: How might best practice be expanded to support statutory consultees, including through reducing the volume of material which developers have to produce?

Development of the AI tool to summarise and pick out relevant to the specific consultation for ease of comment.

Question 31: How best can government and statutory consultees support the increase in capacity and expertise of local and strategic authorities?

Have clearer policies and allow local judgement to prevail in less significant cases.

Question 33: Should the government maintain the moratorium, subject to periodic review, or adopt criteria for consideration of new statutory consultees?

Maintain – but review specifically in view of climate change impacts on water and landscapes.

Question 37: Based on the proposed changes to referral criteria, would statutory consultees expect to see performance improvements? Please explain your reasoning.

Hope that less actual consults would result in better performance with quicker turnaround, but I worry that the reduced workload will result in either staff reduction leading to workloads returning to current levels and longer processing times or “over thinking” of advice due to reduced individual case load, result in long end to end times for each case.

Appendix 3 – Electric vehicle charging

Department of Transport

Document: [Electric vehicle charging: changes to permitted development rights - GOV.UK](https://www.gov.uk/government/consultations/electric-vehicle-charging-changes-to-permitted-development-rights)

Due date: 21 January 2026

Status: Government consultation

Proposed level: Planning Committee endorsed

Notes

Permitted development rights (PDRs) allow certain building works to be carried out without the need to submit a planning application, streamlining processes and reducing costs for property owners and developers.

The government has already made changes to PDRs to support the deployment of electric vehicle (EV) chargepoints.

This consultation asks about further proposed changes to PDRs to allow for:

- multiple units of equipment housing or storage units for electric vehicle chargepoints in non-domestic, off-street car parks
- the installation of cross-pavement solutions and associated domestic chargepoints

Proposed response

Question 1. Do you agree or disagree that the permitted development rights should be extended to allow for multiple units of equipment housing (with a cumulative maximum volume of 29 cubic metres) in a non-domestic car park?

The Government continues to consult on change to PD rights without including images of the infrastructure they are referring to or including examples of what the existing PD right results in and what the proposed PD right could result in. This is quite basic and useful information. It is not clear why this information would not be included in such consultations. As such, it is presumed that the infrastructure referred in this consultation to looks like the photos below.

It seems that the current PD right is for one unit of no more than 29 cubic metres. The proposal is for multiple units with a cumulative max volume of 29 cubic metres.

The proposal does not say if these are to be in one place or placed around the car park. If our presumption is correct and the term 'equipment housing' refers to the individual charging points and the cabinets as shown in the last two photos, then that seems acceptable as the cabinets would be in one place and then you would place the charging points where the parking spaces are.

The proposal does not also say if the new PD right means that new infrastructure will not 'exceed 3 metres in height from the level of the surface used for the parking of vehicles'; that is one of the restrictions of the current PD right.

We support the proposal subject to the following:

- Colouring and appearance of cabinets reflect the area they are located in – the townscape and landscape.
- Lighting of the charging points and any lighting associated with the infrastructure is minimal and does not cause light pollution or glare.
- Not exceed 3 metres in height from the level of the surface used for the parking of vehicles.
- The cabinets are sited in a logical part of the car park and do not overbear or dominate the appearance of the car park.
- The potential for built in solar panels on the units is explored and included where acceptable.

Images

It is presumed that the consultation refers to these kind of cabinets and enclosures:

Image taken from [EV Charging Enclosures | EV Cabinets | Eldapoint Group](#)



And a search for 'ev charging equipment housing car park' comes up with these images:



Question 2. Are there any other likely impacts that should be considered if permitted development rights are extended to allow for multiple units of equipment housing?

We support the proposal subject to the following:

- Colouring and appearance of cabinets reflect the area they are located in – the townscape and landscape.
- Lighting of the charging points and any lighting associated with the infrastructure is minimal and does not cause light pollution or glare.
- Not exceed 3 metres in height from the level of the surface used for the parking of vehicles.

- The cabinets are sited in a logical part of the car park and do not overbear or dominate the appearance of the car park.
- The potential for built in solar panels on the units is explored and included where acceptable

Q3. Do you agree or disagree that a new permitted development rights should be introduced for the installation of cross-pavement solutions to support on-street EV charging?

It is presumed that the type of cross pavement solution will be similar to the current guide: [Cross-pavement solutions for charging electric vehicles - GOV.UK](#) – effectively a narrow trench in the footway with a cover so there is no trip hazard.

If this is the case, then yes.

Q4. Do you agree or disagree that the new permitted development right should allow for an associated off-street EV chargepoint which is linked to a cross-pavement solution?

The question is oddly worded – the cross pavement solution for the cable is needed when an off street EV chargepoint is put in place to enable the cable to reach the EV safely; that is to say that you need a charger for the cable to connect to and that cable needs to not cause a trip hazard. The question as written says that if you have a PD right to put in a cross pavement solution to link to an EV chargepoint, should there be a PD right that allows for this EV chargepoint.

So this is not about cross pavement solution for the cable. This is adding a PD right for a chargepoint. This is not really discussed in the preamble to the questions and the title on the webpage is solely about ‘**Cross-pavement charging solutions**’. No information is given about what this new PD right for an off street EV chargepoint is so no answer can be given.

If you are consulting on whether a dwelling can have a new ev charging point as PD then that seems logical, but what about listed buildings? What about the size and bulk of the charger? What about the lights on the charger? There is nothing in the consultation about thresholds, size limits or parameters to enable a reasoned response.

Q5. What, if any, further stipulations are required to ensure accessibility of the pavement for all users?

The obvious one is that the solution should not be a trip hazard and should not prevent use of the footway by all users.

Q6. What, if any, likely impacts do you think should be considered if a PDR is introduced to allow for cross-pavement solutions and associated chargepoints?

See answer to Q4 – this is covertly bringing in the chargepoint PD right and it is more that the cross pavement solution is associated to a new chargepoint. Little information is given about installing a new chargepoint to a dwelling as part of this consultation. It is included in the questions only and not in the preamble.

Lighting of the units is a big consideration – no need for lighting.

Q7. In your view are what, if any, further changes are needed to reflect and ensure consistency with devolved policies in Scotland, Wales and Northern Ireland?

The preamble does not discuss this. So without information, the question cannot be answered.

General comments

Does the wording of the PD right have the restriction that it only applies where a Streetworks licence is in place? Otherwise we will likely see people using a charger and a cable cover, which will reduce accessibility for wheelchair users.

Issues such as trip hazards ought to be resolved by still needing the streetworks licence.

There is the usual dark sky issue with these chargers – the presence of the lighting can impact on the dark skies of an area.