

Solar on Car Parks and Electric Vehicle Charging

Part Two: Electric Vehicle Charging Infrastructure and Planning

Introduction

Q: What type of stakeholder is responding? Other

Historic England is the government's statutory adviser on all matters relating to the historic environment in England. We are a non-departmental public body established under the National Heritage Act 1983 and sponsored by the Department for Culture, Media and Sport (DCMS). We champion and protect England's historic places, providing expert advice to local planning authorities, developers, owners and communities to help ensure our historic environment is properly understood, enjoyed and cared for.

We welcome the opportunity to respond to part two of this call, concerning delivering electric vehicle (EV) charging infrastructure.¹ EVs bring key benefits and charging points can often be integrated successfully into historic places. However, this infrastructure must be delivered in a sustainable manner. In planning terms this means pursuing interdependent and mutually supportive economic, social and environmental objectives including protecting and enhancing our natural, built and historic environment.²

Main Questions

Charging on Private Land

Q: Are the current planning rules, included planned changes, around charging on private land appropriate? Are there further potential changes that could be made to the planning system in relation to EV charging installations and the associated site in residential and commercial settings, including listed buildings? What evidence can you provide that would support this position?

Q: Are the current and planned planning rules around equipment, housing and energy storage systems (i.e. batteries), and the use of solar appropriate? Are there further changes to the planning system that could accelerate the installation of energy storage systems to support chargepoint installations? What evidence can you provide that would support this position?

EV charging can be incorporated successfully into historic settings as reflected in our own published advice, which states they will generally be acceptable subject to careful siting and consideration of archaeological impact.³ However, we expressed concerns over proposed changes to permitted development rights for EV charging points consulted on by government in 2024.⁴ Removing restrictions on siting and allowing construction of comparatively large

¹ [Call for Evidence on Solar on Car Parks and Electric Vehicle Charging Points](#)

² [National Planning Policy Framework \(2024\) Paragraph 8](#)

³ [Historic England Advice Note 18 \(2024\) Adapting Historic Buildings for Energy and Carbon Efficiency](#)

⁴ [Changes to Various Permitted Development Rights Historic England Consultation Response](#)

equipment housing without consideration through the planning process could have a cumulative impact on the character and appearance of historic areas and harm the significance of designated heritage assets. A blanket approach will not enable local planning authorities, through the planning process, to effectively deliver environmental goals and meet statutory obligations for the conservation and enhancement of the historic environment. They have a key role in supporting the delivery of EV infrastructure sustainably by providing clarity on expectations through local plan design policies, design codes and guides, guidance in conservation area appraisals, and use of streamlining tools such as Local Development Orders.

Cross-Pavement Charging and On-street public charging

Q. What changes could be made to consenting processes for cross-pavement charging solutions, if any? What evidence can you provide to support this position?

Q: Are the current rules for planning and consents around on-street charging appropriate? What further changes would you make? What evidence can you provide to support this position?

Well-designed street equipment, including public EV charging, can enliven a space and encourage its use. However, our streetscape guidance draws attention to the risks of piecemeal change, including the introduction of street clutter.⁵ This is particularly evident where separation between local authority functions leads to uncoordinated activity and the introduction of single function items without regard to the whole street scene.

If not designed and delivered in a coordinated manner EV charging risks degrading streetscapes, a cumulative impact on the character and appearance of historic areas, and impact to archaeological remains through unconstrained and piecemeal proliferation. Cross pavement charging, e.g. a covered gully, could involve damage to historically significant surface materials, incongruous materials for the gully and cover, poor-quality surface reinstatement and the proliferation of piecemeal intrusions along a street.

For historic areas, public realm works should follow a strategic approach established by the local authority, including through the plan-making process, based on a firm understanding of the area and bringing together functions such as planning, highways, conservation, regeneration and urban design. This should consider issues such as function, location and durability of equipment, longer-term management to firstly avoid, and then reduce, street clutter, and weigh the relative benefits of different options such as combining equipment and, for cross-pavement, whether designed buildouts or extensions to pavements, are preferable.

Operation of any licensing procedures must ensure that standards are shared across distinct authority functions and those operating on their behalf. Powers to ensure inappropriate works are remedied swiftly should also be considered.

⁵ [Historic England \(2018\) Streets for all](#)

Conclusion

We are supportive of measures to integrate EV charging infrastructure into historic areas. However, to be truly sustainable their rollout needs to consider impacts including the cumulative erosion of the character and appearance of a place over time. This necessitates a coordinated approach to balance options and create robust design and implementation standards enacted through both the planning process and associated licensing consents.

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