



## **Historic England Response to 'Electric vehicle chargepoints in residential and non-residential buildings'**

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 Digital, 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. Our comments relate specifically to the impacts of the proposals on the historic environment, rather than on the technical aspects around EV chargepoints.

### **General comments**

- Historic England recognises the potential of EV uptake, to address air quality and supports the challenge of achieving net zero greenhouse gas emissions, and is broadly supportive of the aims of the proposed policy. We welcome the opportunity to offer the following comments
- We do not believe that the historic environment should, in and of itself, be a barrier to the installation of charge-points, but support the use of exemptions to address the limited number of cases where there may be unavoidable and unacceptable harm.
- In addressing exemptions, we would suggest an approach that is more closely aligned with related policy and legislation, as outlined in more detail in our responses below.
- Historic England welcomes the opportunity to respond to the following consultation questions:

### **Q58: Do you agree that we should apply an exemption for listed buildings and buildings in conservation areas as suggested above?**

- In principle, we support the overall proposed exemption for listed buildings and buildings in conservation areas, but some of the detail needs correction. The effort to consider a wider variety of heritage asset types is also very much welcomed, but, again some of the detail is inaccurate, and perhaps overly complicated. For example:
  - Paragraph 1.14 concerns itself with exemptions for listed buildings, scheduled monuments and conservation areas. However, the phrase "character and appearance" is taken from legislation and guidance relating specifically to conservation areas, and not to listed buildings and scheduled monuments.
  - Paragraph 1.15: this section seems to be referring to what the National Planning Policy Framework (NPPF) refers to as non-designated heritage

assets, incorrectly refers to scheduled monuments, and refers to the curtilage of scheduled monuments instead of listed buildings. It appears to be conflating legislation and policy relating to designated heritage assets, and the specific categories of land referred to in Article 2(3) of the Town and Country Planning (General Permitted Development) (England) Order 2015 (which are generally used to define exclusions within planning legislation, such as exclusions from permitted development rights).

- Paragraph 1.16: greater clarity and consistency would be achieved if the wording from the NPPF was used, instead of ‘prejudice the character of the host building’.
- We would be very happy to discuss how best to achieve the desired objectives with regard to the historic environment, including consideration of potential impacts on Areas of Archaeological Priority, and on undesignated archaeology (and especially non-designated heritage assets of archaeological interest, which are demonstrably of equivalent significance to scheduled monuments, should be considered subject to the policies for designated heritage assets: NPPF, footnote 63).
- Should these exemptions be supported, we would suggest for the sake of clarity that such exemptions are incorporated into any flowchart diagrams in the approved documents.
- It might also be useful to note in the text that for listed buildings and scheduled ancient monuments additional permissions are likely to be required (Listed Building Consent and Scheduled Monument Consent, respectively).

**Q59: If you disagree, please explain why.**

- Whilst exemptions have been incorporated into the Draft Technical Guidance (Annex C) we believe that document would benefit from minor amendments: to better protect the historic environment from unintended harm, to ensure that the language used is appropriate to the specific heritage type under consideration, and to clarify (what we understand to be) the meaning/intention of the Guidance (see response to Q58, above).

*Strategy and Listing Team  
Historic England  
07 October 2019*