

Planning, Design and Access Statement
supporting a
Planning Application for an EV Charging Hub
north of
Bath Road, Chippenham, Wiltshire
September 2025



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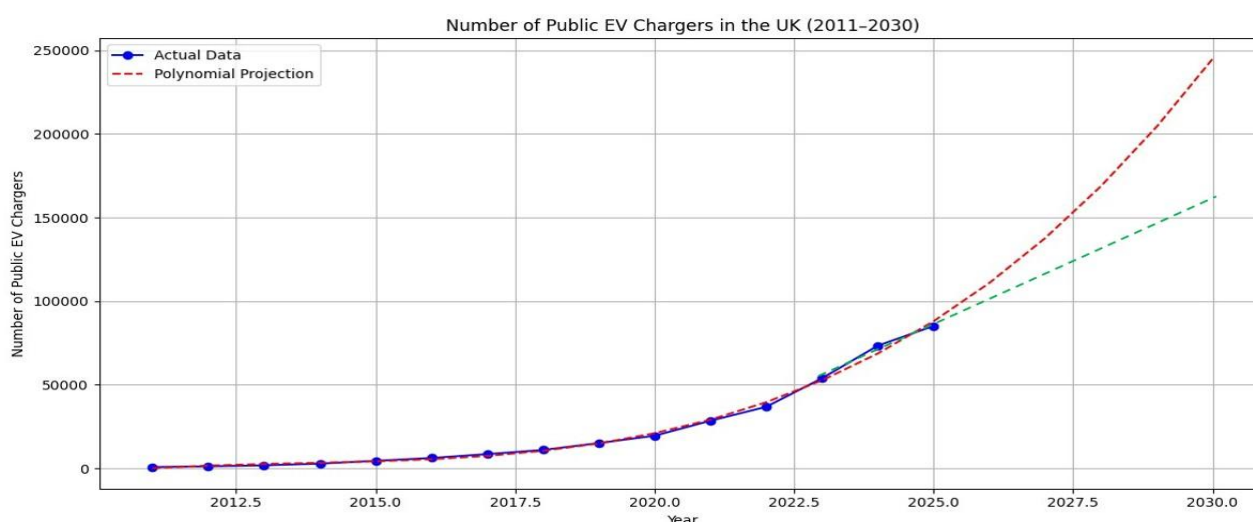
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*"In November 2020, the Prime Minister put the UK on course to be the fastest nation in the G7 to **decarbonise road transport**, announcing that sales of all new petrol and diesel cars and vans would end in **2030**. Alongside Government plans to introduce targets for sales of clean vehicles from 2024, the public discourse on zero emission motoring has now firmly shifted from if it will happen, to when. [...] We expect around **300,000 public chargers as a minimum by 2030**. Our goal is to ensure these chargepoints are installed ahead of demand, inspiring confidence in drivers who have not yet made the switch."*

(Taking Charge: the UK Electric Vehicle Infrastructure Strategy, DfT March 2022)

"As of February 2025, the UK had 75,675 public electric vehicle (EV) charging points"

(ZapMap June 2025)



Graph showing the number of public EV chargers in the UK from 2011 to 2025, with a projection through to 2030 **showing a failure to meet Government targets** (sourced from the National Chargepoint Registry 2011 to Dec 2024)

Author	Date	Report version
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1. Introduction

- 1.1 Lone Wolf Planning Ltd. have pleasure in submitting this planning application for the development of an Electric Vehicle (EV) ultra-rapid charging hub on land north of Bath Road and east of the A350, Chippenham, Wiltshire.
- 1.2 Transport decarbonization is a Government priority in relation to climate change and net zero prerogatives.
- 1.3 By 2030, a ban on the sale of new internal combustion engine cars (ICE) will come into effect and will have been preceded by moves in that direction by auto-manufacturers.
- 1.4 Predictions vary but, by 2030, the number of EV vehicles on UK roads may have increased from the 1.3million on the roads in early 2025, to between 6 to 8 million¹ and 16 million² by 2030; between a five and twelve-fold increase.
- 1.5 As of early 2025 there are around 75,000 public EV chargers installed across the UK; installed between 2011 and 2025. The Government has set a minimum target of 300,000 public EV chargers to be installed by 2030, based on current performance, the fact that 'easier' sites might already be developed, and future projections, society will fall short of this minimum figure by around 85,000 chargers.
- 1.6 The Government's Electric Vehicle Charging Infrastructure Strategy is clear that:
 - 🐾 *"The UK Government has committed to net zero emissions by 2050. It is **essential** for the vehicles on the UK's roads to be emission-free at the tailpipe".*
 - 🐾 *"Transport is the UK's largest emitting domestic sector and 91% of UK transport emissions come from road transport. If the UK economy is to achieve net zero emissions by 2050, it **has to decarbonise road transport**. The recent rapid increase in both the supply of, and the demand for, EVs means that **charging infrastructure now stands as the single biggest challenge to that decarbonization**".*
 - 🐾 *"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".*
 - 🐾 *"Planning permission delays are often cited as a major brake on the speed of deployment".*
- 1.7 InstaVolt is the UK's largest, fastest growing and most reliable rapid charge point operator, with over 2000 public rapid chargers across the UK.
- 1.8 InstaVolt is committed to the expansion of the UK's public charging infrastructure to support the Government's ambitions to ban the sale of new fossil fuel cars from 2030. To achieve this goal, substantial investment is required by the private sector into new, high quality charging infrastructure for EV drivers to charge in public. InstaVolt expects to invest over £350m up to 2030 to expand its network to 10,000 charge points in the UK alone.
- 1.9 Historically, the network has focused on retrofitting small numbers of chargers on

¹ [Government sets out path to zero emission vehicles by 2035 - GOV.UK](#)

² [Electric vehicle charging market study: final report \(Competition and Markets Authority\)](#)



existing sites (such as drive-to food and coffee outlets).

- 1.10 However, as demand for public charging relentlessly grows, networks such as InstaVolt must commit to building larger hubs that provide greater capacity, particularly along the strategic road network.
- 1.11 InstaVolt's pedigree in this arena is on record with the development of the Winchester Superhub, the UK's largest ultra-rapid EV charging station, which since its opening earlier this year has received numerous industry plaudits and was shortlisted for the 2025 Royal Town Planning Institute's Planning Awards for Best Project in the south east.



- 1.12 The local planning authority will also be well aware that InstaVolt has acquired the consented Chicklade EV service station, and is in the process of addressing planning conditions in order to open the regionally significant scheme:



- 1.13 This project will see an EV hub developed at a strategic location, south of the M4 on the A350, in a location that will serve drivers heading to the south and southwest and vice versa.



- 1.14 The site has been chosen based on its proximity to the strategic road network, near to both the A350, A4 and the M4 and the point of connection to the electricity grid, which is recognised in the field of low-carbon infrastructure development as being a critical planning and viability consideration.
- 1.15 The site is designed to support public ultra-rapid EV charging for all users. The site will include lighting to support vulnerable users who might charge alone.
- 1.16 We believe the project to be another fantastic example of the private sector's commitment to support the Government's journey to an electrified transport future.
- 1.17 The 'Main Issues' in this case will be:
- 🐾 Compliance with the development plan (local plan and neighbourhood plan)
 - 🐾 The influence of material considerations

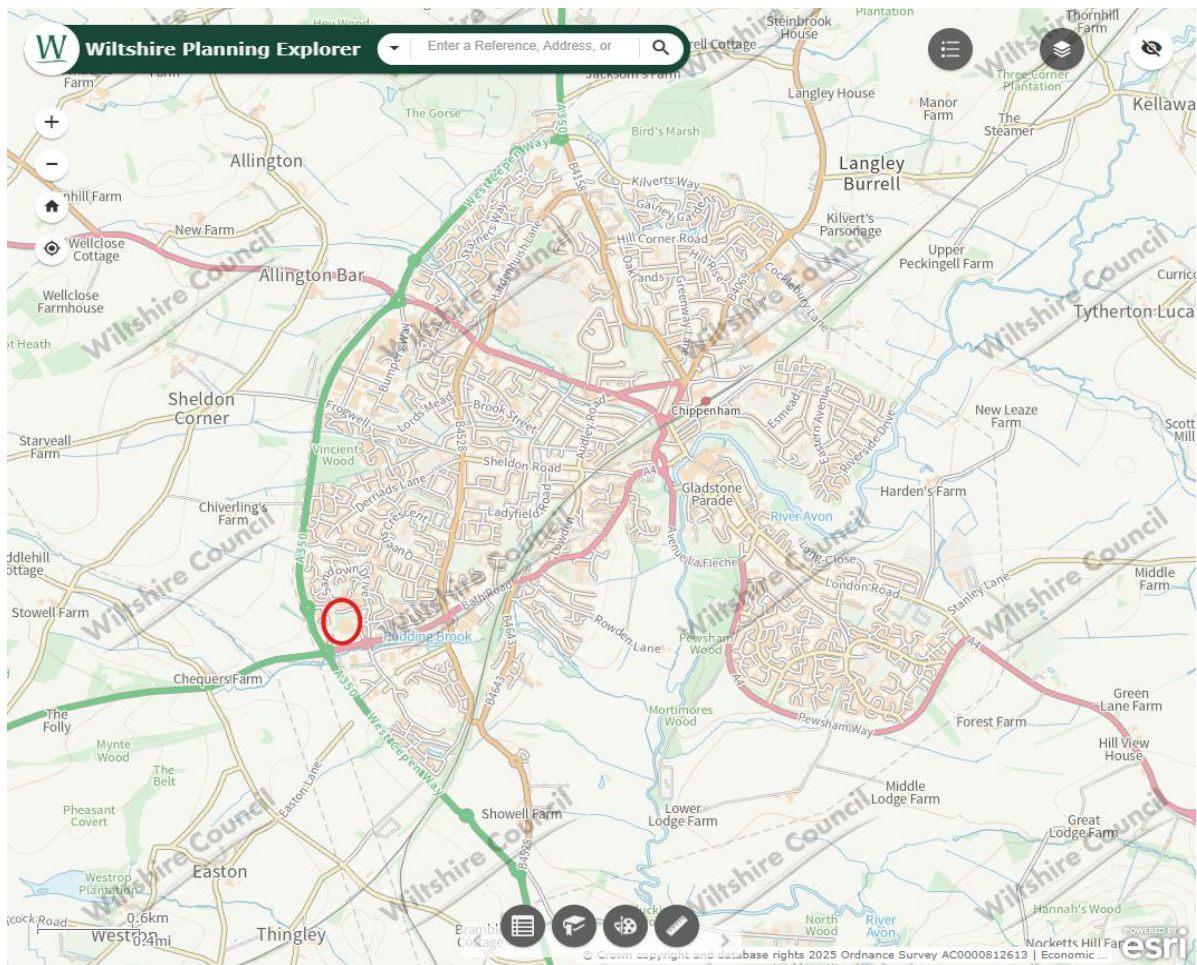
2. Site Location and Description

- 2.1 The site is located at Chippenham in Wiltshire.
- 2.2 Chippenham is a Principal Settlement at the highest level of the Council's settlement strategy.
- 2.3 "Chippenham is one of the largest towns in Wiltshire and has excellent transport links,

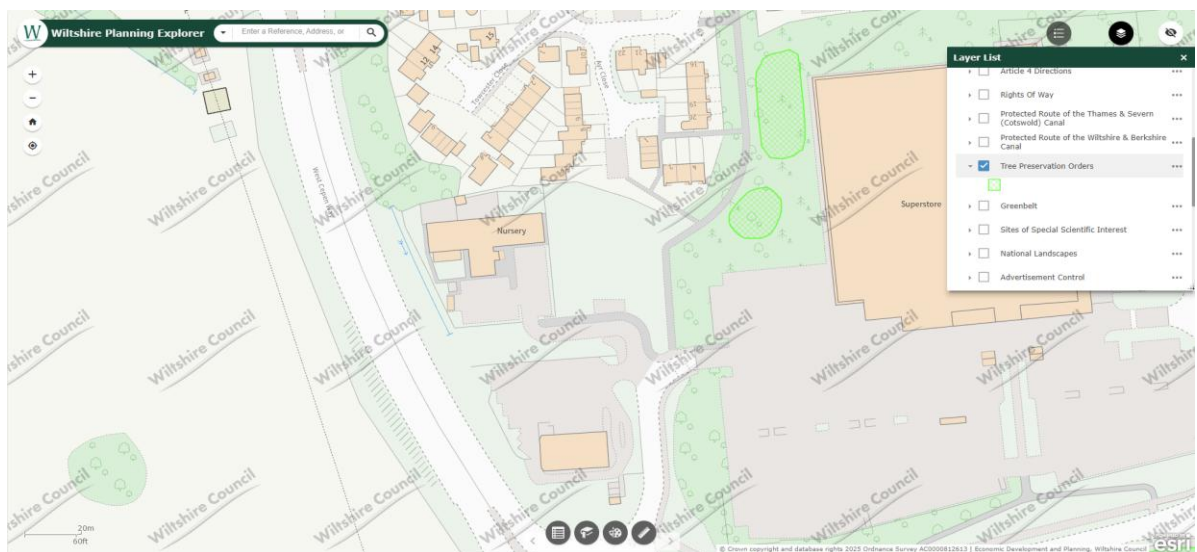


being in close proximity to the M4³.

- 2.4 The site is located to the southwest of the town and immediately east of the A350 and north of the A350 / Bath Road interchange:



- 2.5 The site is relatively undesignated. There are some tree preservation orders ≤50m to the east:



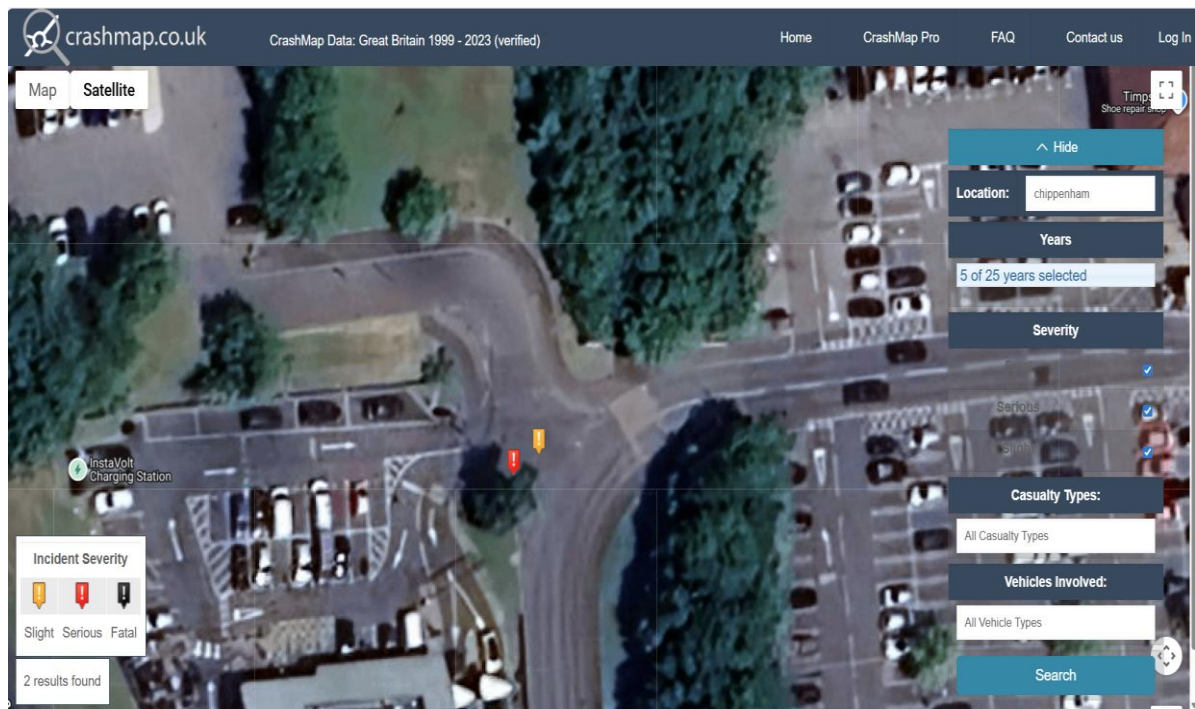
³ Wiltshire Core Strategy para 5.45



2.6 The site presents as an undeveloped plot within a larger commercial area:



2.7 The CrashMap website only records two vehicular incidents in the previous 5 years of data it holds (from 2019 to 2023). This indicates that there are nothing especially unusual or hazardous about the access to the site off the access road to Sainsbury's:



2.8 The wider commercial area services a large Sainsbury's supermarket and petrol station which includes a number of independent concessions.

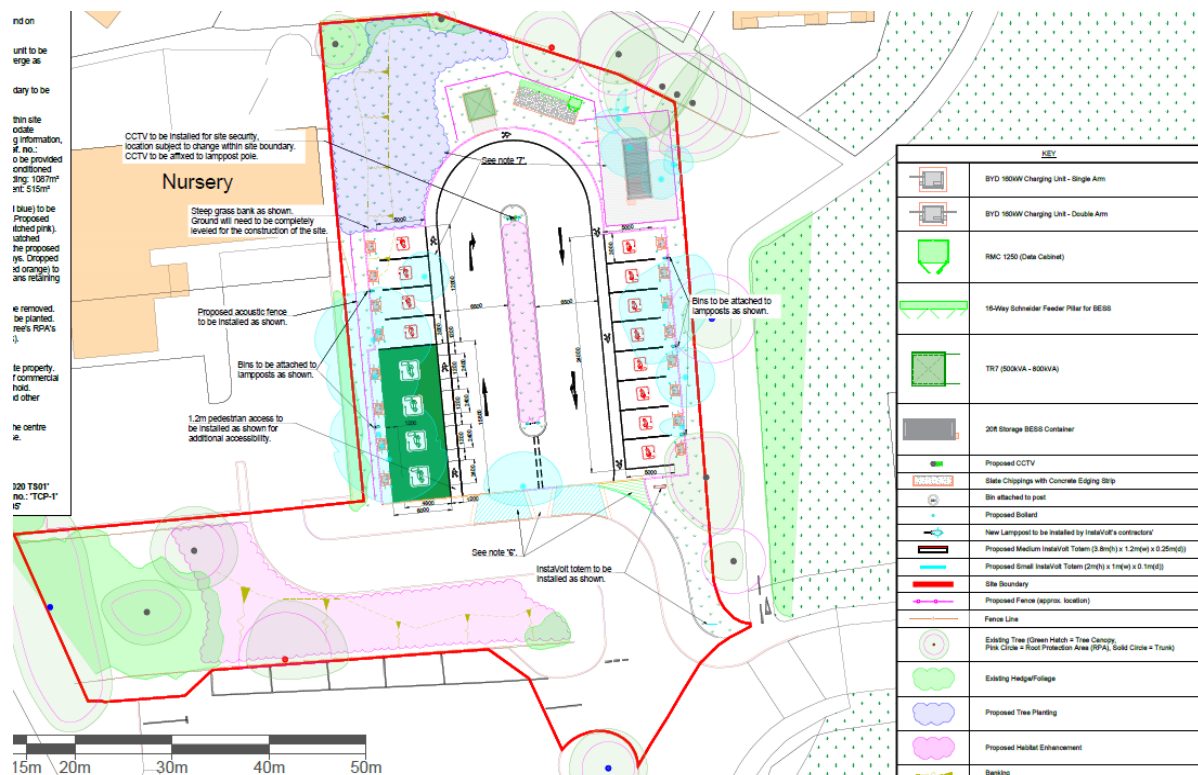
2.9 There is also a children nursery, McDonalds, KFC, TK Maxx, Costa Coffee, Aldi and Marks and Spencer to name a few:





3. The Proposed Development

3.1 The proposal is for a standalone public EV rapid charging hub including 16 rapid public chargers, similar to ones that InstaVolt has installed around the country:



3.2 The development will consist of the following elements:



- ✦ 16 rapid EV charging units
- ✦ Battery storage compound
- ✦ Lighting and CCTV
- ✦ Substation
- ✦ Feeder pillar
- ✦ Signage

3.3 The internal layout is oriented around a one-way circulatory with pedestrian and vehicular separation.

3.4 The photo below is of one of InstaVolt's other installations, to give an impression of the layout:



4. The Outcomes of Site Surveys

4.1 This planning application is supported by the following reports and surveys which cover the following specialist topics:

- ✦ Ecology survey and biodiversity net gain matrix and report
- ✦ Tree survey and report
- ✦ Highways statement
- ✦ Drainage strategy
- ✦ Noise report



- 4.2 The submitted ecological appraisal is clear that the site is not ecologically remarkable and makes a suite of recommendations to protect and enhance biodiversity:

"The proposal will result in the removal of an area of modified grassland, individual trees, a line of trees and mixed broadleaved woodland to facilitate the construction of a hardstanding parking area and installation of sixteen electric car charging points with associated infrastructure, lighting and landscaping, including the planting of replacement woodland in the northwestern extent of the site.

This will remove habitat for, and will negatively impact feeding & commuting bats, birds, invertebrates, badger, reptiles, amphibians and hedgehog."

"Avoidance/Mitigation Measures

To alleviate the impacts on protected species during development, the following measures should be undertaken (see Constraints Plan – Appendix 5):

- ***Prior Habitat Management & Removal:*** the modified grassland should be maintained with a short sward up until the commencement of and during the proposed development.
- ***Nesting Birds:*** the removal of the trees on site should take place outside the nesting bird season (the bird nesting season is considered to be March-August inclusive; although, depending on the species, geographical area and weather nesting can take place outside of these times).

If the works are undertaken during the nesting bird season, a nesting bird check will be required by a suitably qualified ecologist. Should nesting birds be found, then tree removal works will be required to be scheduled for when nesting is completed (i.e. after the last chick has fledged).

- ***Excavations/Pipework:*** any excavations or pipework, which are to remain open overnight, should be fenced or covered to prevent potential entrapment and/ or injury of species such as badger, hedgehog or polecat.
- ***Lighting Specifications:*** a sensitive lighting plan will be required, ensuring that the retained and created habitats within and beyond the site are not impacted by light spill (Section 6.2.1)."

"Compensation & Enhancement Measures

To alleviate impacts to protected species the following compensation measures should be undertaken (see Compensation & Enhancement Plan – Appendix 6):

- ***New Planting:*** All new planting to be native and of local provenance.
- ***Inbuilt Wildlife Provisions:*** five bat, five bird and five invertebrate provisions to be positioned upon appropriate on-site trees at a minimum height of 4 m, 2 m and 1 m respectively (Appendices 7-9).
- ***Tree/Woodland Planting:*** Planting of a number of small-sized individual broadleaf trees on site to consist of native species that will provide habitat for a range of species. See tree planting specification in Section 6.3.1.
- ***Hedgerow Planting:*** Planting of species-rich native hedgerow to consist of a



minimum of five native species of local provenance. See hedgerow planting specification in Section 6.3.2.

- **Grassland Enhancement:** *Enhancement of modified grassland to other neutral grassland will provide habitat for a range of species. See grassland management specifications Section 6.3.3.*
- **Scrub Enhancement:** *Enhancement of bramble scrub to mixed scrub which will provide habitat for a range of species. See Habitat management specifications Section 6.3.3'*

4.3 The BNG report is clear that offsite credits are required, and we look forward to receiving details from the LPA of local credit sites.

4.4 The ecological recommendations and enhancements, and the offsite BNG credits should be secured by planning condition in order to avoid the net loss of biodiversity sought by policy.

4.5 The submitted arboricultural implications report is clear that:

- ☛ *"The loss of trees will be compensated by new tree planting to complement the new site layout. A tree planting specification has yet to be produced but it is intended that this is to be provided after planning permission has been achieved"*
- ☛ *"A cellular confinement system will be used to remove chances of soil compaction beneath a new hard surface. The ground preparation works in advance of laying this surface will be carried out under arboricultural supervision in accordance with the accompanying arboricultural method statement".*
- ☛ *"The new hard surface will cover a small percentage of the RPAs, so provided the surface is laid in accordance with the accompanying arboricultural method statement, I expect the trees to easily tolerate the new surface".*
- ☛ *"Tree protection fencing and ground protection will be installed in the locations identified on the tree protection plan and a specification for these measures are provided in the accompanying arboricultural method statement".*

4.6 The submitted Transport Statement is clear in concluding that:

- ☛ *"The proposals are for a total of 16 EV charging spaces, with 4 fully accessible EV charging spaces and 12 wider EV charging bays.*
- ☛ *The proposals allow users of the charging bays to walk to amenities near the site by the footways adjacent to the site, including the restaurant and supermarket. Access to the site is taken via the existing access to the Busy Bees Nursery. It is understood that the existing access road would be slightly realigned.*
- ☛ *Considering the trip attraction, a maximum of 11 vehicle movements are predicted during the traditional network peak hours. Given the potential for trips to be linked to nearby uses such as McDonald's, Sainsbury's, and Busy Bees Nursery, the number of primary trips attracted is expected to be even lower.*
- ☛ *The proposals have been developed in the context of national, regional and local policies and good practice. It will not result in a severe impact, so in conclusion there*



are no transport or highway reasons for which the proposed development should not be granted planning consent."

4.7 These conclusions help with the assessment of the proposal against policy.

4.8 The submitted drainage strategy proposes the following:

"It is proposed that flows from the site will be discharged to the public surface water sewer system owned and operated by Wessex Water. This will be achieved through positive drainage within the proposed charging hub consisting of a system of gullies and carrier drains collecting and conveying flows to attenuation crates below the charging bays/access/landscaping. The attenuation solution has been sized to accommodate flows for the 1 in 100 rainfall event plus 40% climate change utilising FEH rainfall data, in accordance with the requirements of the Wiltshire Council Strategic Flood Risk Assessment and National Planning Policy Framework (NPPF) requirements. The new drainage network will be designed to appropriately control the offsite discharge and prevent flooding within the site and downstream areas.

Any connection to the public surface water sewer will be subject to the appropriate connection agreement with Wessex Water.

The proposed outline drainage strategy and supporting calculations for the site are included in Appendix D"[of the drainage strategy].

4.9 These recommendations help with the assessment of the proposal against the development plan and the NPPF.

4.10 The submitted noise survey and report concludes that:

"This report provides a noise assessment of activities associated with the charging station, specifically plant noise from the chargers.

A baseline noise survey and plant noise assessment has been completed. The assessment clearly indicates that the plant noise will be acceptable and of a low impact during both day and night when assessed to British Standard 4142:2014+A1:2019.

On this basis, we would consider the noise impact of the proposed plant to fall below the Lowest Observed Adverse Effect Level (LOAEL) of the NPSE and NPPG and achieves the aims of National Planning Policy Framework (NPPF).

*We consider that **noise should not be considered a material constraint in determining the plant noise aspects of the planning application.**"*

5. Pre-submission Local Engagement

5.1 On 4th September we attended a meeting of Chippenham Town Council⁴ to present the proposal and to answer questions.

5.2 At that meeting, and afterwards, a range of questions were asked, answers for which are provided below.

⁴ <https://www.youtube.com/watch?v=c3f6BFq6hAs>



Q: Have other sites been considered, especially a former car showroom site nearby?

5.3 At the recent Town Council meeting, we were asked whether other sites had been considered, in particular a nearby former car showroom. It is not known whether that site is available to the market, and InstaVolt have not been approached by its owner.

5.4 The application site is available, hence this application. The application site has a visible connection to the power grid. Planning applications should be considered on their merits, especially where there is no need to consider alternative sites.

Q: Has 'safeguarding' of the nursery been considered?

5.5 The proposal includes a pedestrian crossing of the vehicular access to convey visitors to the children's nursery safely.

Q: Is a solar canopy proposed?

5.6 No solar canopy is proposed.

Q: Is power available?

5.7 Grid capacity will have been confirmed in advance of this application being made.

Q: A Green Corridor identified under Neighbourhood Plan Policy GI4 immediately adjoins the site. Will the proposed lighting scheme be able to comply with the minimum standards for Environmental Zone E2 light spillage to the Corridor as per the policy requirement, and could an isolux plan be submitted with the application to demonstrate this point?

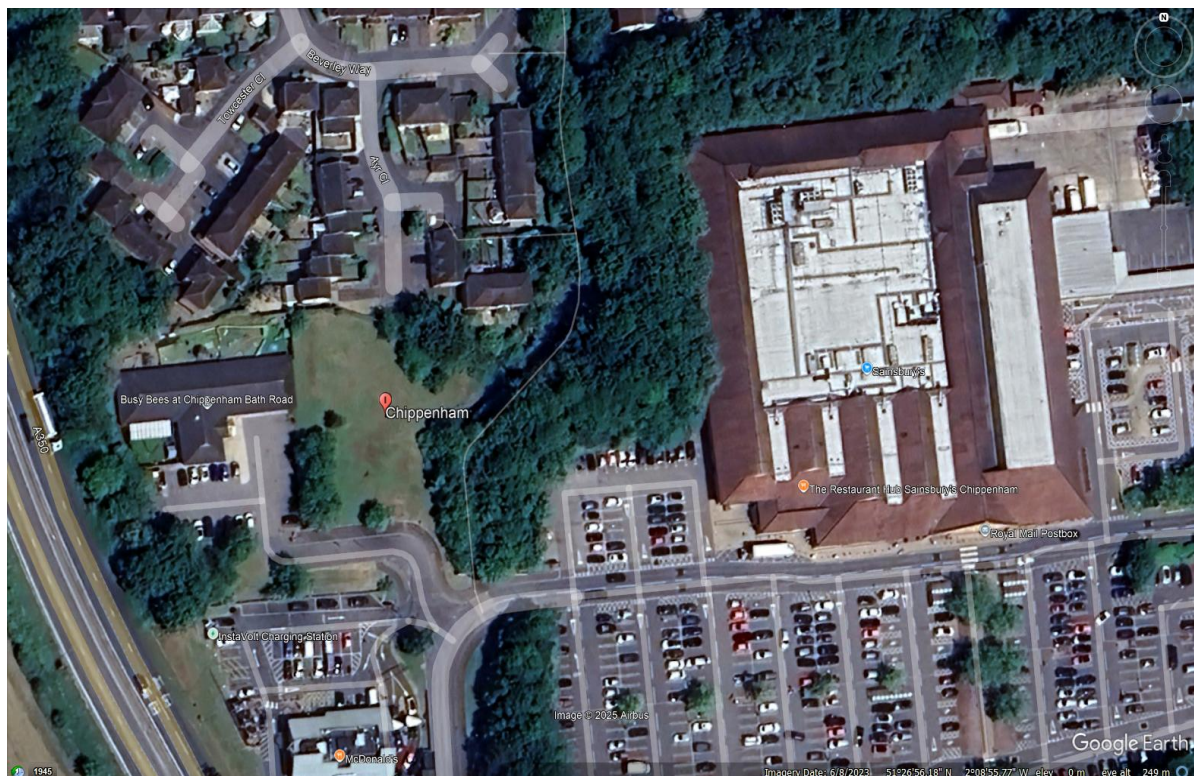
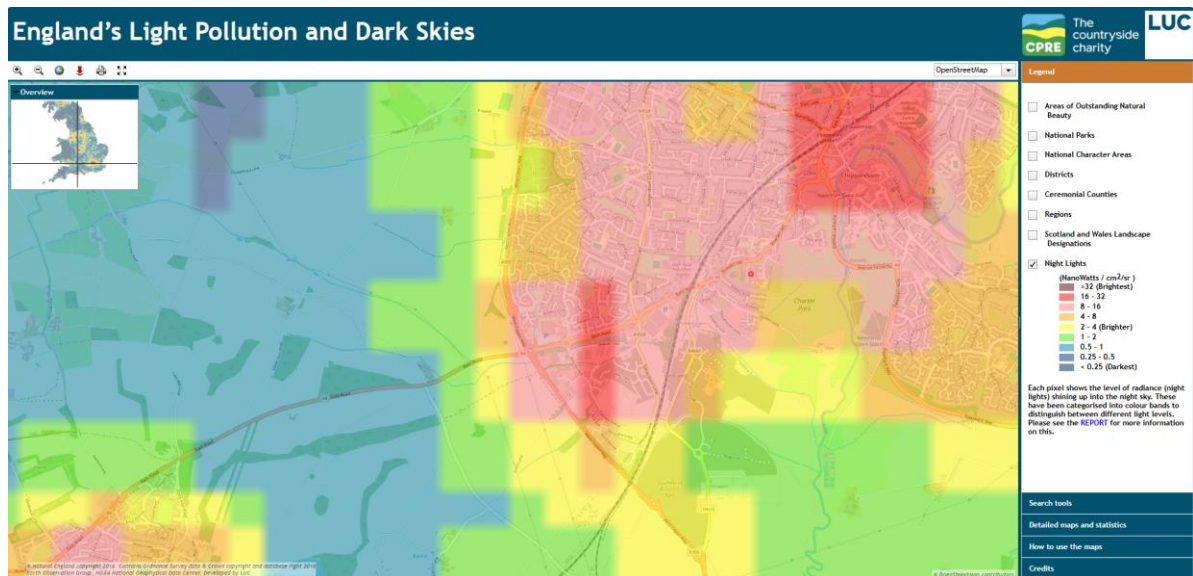
5.8 As discussed below, the site is adjacent to a 'green corridor'. However, as set out below, that green corridor is lit.

5.9 Please see Appendix 1 of the lighting strategy for the light spill plan.

5.10 Whilst the ambitions of the neighbourhood plan to achieve EZE2 in new lighting proposals, the CPRE mapping below is clear on the relative darkness of this area, and the lighting consultants have determined that the site is located in Zone E3 Suburban, which must be correct:

Zone	Surrounding	Lighting Environment	Examples
E0	Protected	Dark (SQM 20.5+)	Astronomical Observable dark skies, UNESCO starlight reserves, IDA Dark Sky Parks.
E1	Natural	Intrinsically dark (SQM 20 to 20.5)	Relatively uninhabited rural areas, National Parks, Areas of Outstanding Natural Beauty, etc.
E2	Rural	Low district brightness (SQM ~ 15 to 20)	Sparsely inhabited rural areas, Village or relatively dark outer suburban locations.
E3	Suburban	Medium district brightness	Well inhabited rural and urban settlements, small town centres or suburban locations.
E4	Urban	High district brightness	Town / City centres with high levels of night-time activity.





Q: Fencing appears to be proposed around the parking bays. Type/height? Would suggest something more robust than timber close boarded fencing. Will there be any hedgehog holes in fencing? Please refer to Neighbourhood Plan Policy GI1

5.11 The fence will probably be a 1.8m close board timber fence.

5.12 Hedgehog holes are not proposed. We suggest that this is not a scheme which hedgehogs should be allowed access to. The EclA makes recommendations for hedgehogs.

Q: Any developer contributions to facilitate improvements to the quality of the adjoining Green Corridor?

5.13 No contributions are proposed at this stage. We note CNP paragraph 6.55 and that policy



GI4 states that “All development located within, or adjacent to, the Green Corridors identified on Figure 6.3 must be designed to protect and enhance these Corridors by [...] Using developer contributions to facilitate improvements to the quality of Green Corridors, including establishing missing links and resolving poor connections within the network”.

- 5.14 It is unclear where the trigger for developer contributions comes into play, what the contributions should be, or that they will not be coming from ordinary CIL monies received by the Town Council. No doubt this will be discussed with the LPA, in the context of CNP paragraph 12.6, when the application has been submitted.

Q: Any new tree planting to the boundary with Ayr Close for screening and BNG?

- 5.15 Yes. See Appendix 6 of the EcIA and BMA report.

6. Development Plan

- 6.1 Planning law is clear that decisions on planning applications must be taken in the context of the development plan, unless material considerations indicate otherwise.

- 6.2 In this case the Development Plan consists of:

- 🐾 2015 Wiltshire Core Strategy
- 🐾 2024 Chippenham Neighbourhood Plan

- 6.3 From a review of the development plan, the following policies were considered potentially relevant to decision making in this case, noting that, due to its age, the core strategy is less relevant than the neighbourhood plan in relation to standalone EV charging infrastructure:

- 🐾 Core Policy 1 Settlement Strategy
- 🐾 Core Policy 10 Spatial Strategy for the Chippenham Community Area
- 🐾 Core Policy 41 Sustainable Construction and Low Carbon Energy
- 🐾 Core Policy 42 Standalone Renewable Energy Installations
- 🐾 Core Policy 50 Biodiversity
- 🐾 Core Policy 51 Landscape
- 🐾 Core Policy 52 Green Infrastructure
- 🐾 Core Policy 55 Air quality
- 🐾 Core Policy 57 Ensuring High Quality Design and Place Shaping
- 🐾 Core Policy 60 Sustainable Transport
- 🐾 Policy SCC1 Net Zero Carbon Development
- 🐾 Policy SCC2 Sustainable Design and Construction
- 🐾 Policy SCC3 Standalone Renewable Energy
- 🐾 Policy GI1 Protecting and enhancing biodiversity



- 🐾 Policy GI2 Local Green Spaces
- 🐾 Policy GI3 Green Amenity Areas
- 🐾 Policy GI4 Green Corridors
- 🐾 Policy T3 Electric Vehicle Charging Infrastructure

6.4 The NPPF is clear on the approach to and application of strategic and non-strategic policies in decision making:

*“20. Strategic policies should set out an **overall strategy** for the pattern, scale and design quality of places and make sufficient provision for:*

*a) homes (including affordable housing), employment, retail, leisure and **other commercial development**;*

*b) **infrastructure for transport**, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);*

c) community facilities (such as health, education and cultural infrastructure); and

d) conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation.

*21. Plans should make explicit which policies are strategic policies. These should be **limited to those necessary to address the strategic priorities of the area** (and any relevant cross-boundary issues), to provide **a clear starting point for any non-strategic policies** that are needed. Strategic policies should **not extend to detailed matters** that are **more appropriately dealt with through neighbourhood plans** or other non-strategic policies.*

22. Strategic policies should look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure. Where larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery.

23. Broad locations for development should be indicated on a key diagram, and land-use designations and allocations identified on a policies map. Strategic policies should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period, in line with the presumption in favour of sustainable development. This should include planning for and allocating sufficient sites to deliver the strategic priorities of the area (except insofar as these needs can be demonstrated to be met more appropriately through other mechanisms, such as brownfield registers or non-strategic policies).” [...]

*“29. Non-strategic policies should be used by local planning authorities and communities to set out more **detailed policies** for specific areas, neighbourhoods or **types of development**. This can include allocating sites, the **provision of infrastructure** and community facilities **at a local level**, establishing design principles, conserving and enhancing the natural and historic environment and setting out other development*



management policies.

30. Neighbourhood planning gives communities the power to develop a shared vision for their area. Neighbourhood plans can shape, direct and help to deliver sustainable development, by influencing local planning decisions as part of the statutory development plan. Neighbourhood plans should not promote less development than set out in the strategic policies for the area, or undermine those strategic policies.

31. Once a neighbourhood plan has been brought into force, the policies it contains take precedence over existing non-strategic policies in a local plan covering the neighbourhood area, where they are in conflict; unless they are superseded by strategic or non-strategic policies that are adopted subsequently."

- 6.5 The policies listed above, are discussed below in the context of the NPPF paragraphs cited above.
- 6.6 The Core Strategy sets out the following Strategic Objectives:
- 🐾 Strategic objective 1: delivering a thriving economy
 - 🐾 Strategic objective 2: addressing climate change
 - 🐾 Strategic objective 3: providing everyone with access to a decent, affordable home
 - 🐾 Strategic objective 4: helping to build resilient communities
 - 🐾 Strategic objective 5: protecting and enhancing the natural, historic and built environment
 - 🐾 Strategic objective 6: ensuring that adequate infrastructure is in place to support our communities
- 6.7 **Core Policy 1** is clear that Chippenham is a principal settlement. It states that principal settlements "*will provide significant levels of jobs and homes, together with supporting community facilities and infrastructure*". This scheme provides a locally significant EV infrastructure development, that **supports this policy**.
- 6.8 **Core Policy 10** sets high level criteria for the Chippenham community area that includes "*offering wider transport benefits*". This scheme supports EV charging infrastructure which is a transport **benefit**.
- 6.9 **Core Policy 41** concerns low-carbon energy development. EV charging infrastructure is low carbon energy development, but the policy has nothing to say on the topic, likely due to its age, and therefore the proposal's performance against the policy is **neutral**.
- 6.10 **Core Policy 42** concerns standalone renewable energy installations. InstaVolt's chargers are powered by 100% renewable energy, however this policy is geared towards energy generating development and has nothing to say about standalone EV charging infrastructure and therefore the proposal's performance against the policy is **neutral**.
- 6.11 **Core Policy 50** covers biodiversity. It requires development to protect and enhance biodiversity. The submitted EclA is clear that the site is ecologically unremarkable, and a range of measures are recommended to ensure biodiversity protection and enhancement in **compliance** with the policy.
- 6.12 **Core Policy 51** covers Landscape. At a strategic level, this scheme will not adversely affect



any landscape designations, sensitive skylines, landscape features, important views or landscape functions, in **compliance** with the policy.

- 6.13 **Core Policy 52** concerns green infrastructure. It seeks the retention and enhancement of green infrastructure. This site is not identified in the core strategy as providing a green infrastructure function, but it is identified as being adjacent to an existing 'green corridor' in the neighbourhood plan. The site is not publicly accessible, and as the submitted ecological surveys show, it ecologically unremarkable. This scheme will see the removal of some low quality trees; a minor impact to green infrastructure, but the function of the green corridor will remain unimpeded and therefore the proposal's performance against the policy is considered to be **neutral**.
- 6.14 **Core Policy 55** seeks to mitigate air pollution from development. It does not champion development that activity improves air pollution. EV infrastructure improves air quality by enabling the transition to a decarbonised and less polluting transport system. The proposal's performance against the policy is **neutral**.
- 6.15 **Core Policy 57** concerns ensuring high quality design and place shaping. Like many design policies of its type, it focuses on the urban design of buildings, elevational design, streets etc. The policy must be read in the context of advice in National Policy Statement EN1 on the approach to high quality design when considering low carbon energy infrastructure – see material considerations section below. The scheme exhibits a high standard of standalone EV charging infrastructure design. It contributes to a strong sense of place that supports sustainable transport. The scheme uses high quality materials and landscaping proportionate to the context, and with regard to meeting the requirements of sustainable transport policy. Through the lens of NPS EN1, the proposal can be seen to **comply** with this policy.
- 6.16 **Core Policy 60** concerns sustainable transport. It aspires to "*support and encourage the sustainable [...] movement of people and goods within and through Wiltshire*". The decarbonisation of the UK's transport system is a Government priority alongside Net Zero and other climate and pollution related imperatives. The policy is clear that this will be achieved by planning [sustainable transport] developments in accessible locations. This scheme is highly accessible to people moving through Wiltshire, in **compliance** with the policy.
- 6.17 **Neighbourhood Plan Policy SCC1** concerns net zero carbon development but focusses on buildings. The proposal's performance against the policy is **neutral**.
- 6.18 **Neighbourhood Plan Policy SCC2** concerns sustainable design but concerns major developments and non-major development that require BREEAM standards. The proposal's performance against the policy is **neutral**.
- 6.19 **Neighbourhood Plan Policy SCC3** concerns standalone renewable energy development. InstaVolt's chargers are powered by 100% renewable energy, however this policy is geared towards energy generating development and has nothing to say about standalone EV charging infrastructure and therefore the proposal's performance against the policy is **neutral**.
- 6.20 **Neighbourhood Plan Policy GI1** seeks the retention and enhancement of features of significant biodiversity value. This site is ecologically unremarkable, in **compliance** with



the aim of the policy. The policy echoes biodiversity net gain requirements. This scheme will see a reduction in habitat units but an increase in hedgerow units. Offsite credits will be required to meet BNG requirements. The policy goes on to require development proposal adjacent to green spaces to provide an appropriate interface to adjoining habitats. The layout plan shows the proposed landscaping in the north of the site, however, with limited space on site for satisfactory movement, and the need to use land efficiently, decision makers may see **some conflict** with this element of the policy.

6.21 **Neighbourhood Plan Policy GI2** deals with local green spaces. By reference to Figure 6.2 of the neighbourhood plan, this site is not identified as a local green space, and therefore the policy-effect is **neutral**.

6.22 **Neighbourhood Plan Policy G13** deals with green amenity areas. By reference to Figure 6.2 of the neighbourhood plan, this site is not identified as a green amenity area, and therefore the policy-effect is **neutral**.

6.23 **Neighbourhood Plan Policy GI4** concerns green corridors. This site is adjacent to a green corridor. The policy states that development adjacent to green corridors must protect and enhance them (through design) and provides a suite of criteria against which proposals will be assessed, to which we respond below:

- i. The principal function of this green corridor is its role as an access route from the housing to the commercial areas and that function will not be compromised.
- ii. No new open space is proposed.
- iii. There is no 'open space' or informal recreation to invest in.
- iv. This criterion does not appear to be directed to applicants.
- v. For obvious safety reasons, this green corridor appears to be lit. New lighting is needed for customer safety and security. Planning conditions can be attached to ensure compliance with the policy criterion, if in its context it is necessary and reasonable to require compliance with this lighting standard.



6.24 The policy-implications of GI4 are considered **neutral**.

6.25 **Neighbourhood Plan Policy T3** concerns electric vehicle charging infrastructure and is the most important policy in NPPF terms. It requires *"Public electric vehicle charge points will be designed to be fully accessible to all potential users, including disabled people, those with reduced mobility and older people, in line with the latest industry recognised technical standards"*. The policy refers to chargepoints, as distinct to parking bays. The current standards are understood to include:



PAS 1899:2022 – Electric Vehicles: Accessible Charging – Specification

Published by the British Standards Institution (BSI) and co-sponsored by Motability Foundation and the Office for Zero Emission Vehicles (OZEV), this is the UK's first dedicated accessibility standard for public EV charging.

Key features include:

- Physical design: Guidance on the placement, spacing, and surrounding environment of charge points.
- Information provision: Requirements for clear signage, instructions, and indicators.
- Usability: Considerations for reachability, lighting, and one-handed operation.
- Inclusive design: Based on direct input from disabled users and evidence-based research.

Public Charge Point Regulations 2023

These regulations, effective from 24 November 2023, set legal obligations for operators of public EV charge points. While not exclusively focused on accessibility, they aim to improve the overall user experience and include:

- Contactless payment requirements for new and existing charge points.
- 24/7 helpline availability.
- Open data standards for charge point information.
- Roaming and pricing transparency.

Accessibility is implied through the requirement for public usability, but PAS 1899 is referenced as the benchmark for inclusive design.

OZEV Design Guidance (2022)

The Office for Zero Emission Vehicles published design guidance to encourage inclusive and accessible EV infrastructure. It builds on feedback from disabled users and design experts, and complements PAS 1899.

Highlights include:

- Avoiding kerbs and plinths that hinder wheelchair access.
- Ensuring adequate lighting and space between bays.
- Designing for intuitive use with clear instructions and reachable connectors.

- 6.26 Like many EV chargepoint installers, InstaVolt sometimes utilises permitted development rights to install chargers in existing car parks that they do not own. From experience, InstaVolt is frequently criticised by planning and highways officers where it proposes to merge two narrow parking spaces into one, claiming 'loss' of approved parking capacity. We have gone to appeal on this matter numerous times.
- 6.27 Accessibility means many things beyond bay size. Where InstaVolt is able to design its developments from scratch, it is compliant with the 2023 public charge point regulations, partially aligned to PAS 1899:2022 and complies with the OZEV design guidance.



- 6.28 Wiltshire Council's parking standards require accessible parking spaces to be 3.6m x 5m. The four widest parking spaces in this scheme are 3.6m+ x 6m. The remaining spaces are 3m x 5m, in excess of Wiltshire's standard requirements.
- 6.29 Policy T3 was written in the context of the basic conditions, not the 'higher' tests of local plan preparation. Development plan policies can reference or encourage compliance with industry standards (e.g. Considerate Constructors Scheme) but they cannot mandate them as legal requirements.
- 6.30 There is no development plan standards for the number of wider disabled spaces required as a proportion of the whole for standalone EV charging developments.
- 6.31 We are content that this development broadly **complies** with policy T3 as written, because the chargepoints comply with all relevant standards and guidance, and four wider spaces are provided which exceed Wiltshire's requirements balancing the needs of respective users and the need to make an efficient use of land and to provide as many chargepoints as possible.
- 6.32 From our review of the potentially relevant development plan policies, we are content that, as far as the policies can be said to be relevant to standalone EV charging infrastructure, and/or not needing to be read in the context of more recent national policy in order to approach them positively, this scheme complies with the development plan as follows:

Development plan policy	Conflict or compliance?
Core Policy 1 Settlement Strategy	Compliance
Core Policy 10 Spatial Strategy for the Chippenham Community Area	Compliance
Core Policy 41 Sustainable Construction and Low Carbon Energy	Neutral
Core Policy 42 Standalone Renewable Energy Installations	Neutral
Core Policy 50 Biodiversity	Compliance
Core Policy 51 Landscape	Compliance
Core Policy 52 Green Infrastructure	Neutral
Core Policy 55 Air quality	Neutral
Core Policy 57 High Quality Design & Place Shaping	Compliance
Core Policy 60 Sustainable Transport	Compliance
Policy SCC1 Net Zero Carbon Development	Neutral
Policy SCC2 Sustainable Design and Construction	Neutral
Policy SCC3 Standalone Renewable Energy	Neutral
Policy GI1 Protecting and enhancing biodiversity	Part compliance and part conflict
Policy GI2 Local Green Spaces	Neutral
Policy GI3 Green Amenity Areas	Neutral



Policy GI4 Green Corridors	Neutral
Policy T3 Electric Vehicle Charging Infrastructure	Compliance

- 6.33 In the case of Corbett vs. Cornwall Council, it was made clear that a breach of one policy (or one part of a policy) does not necessarily mean conflict with the development plan as a whole.
- 6.34 NPPF paragraphs 11.c) and 39 are clear on the positive approach that the LPA should take in this circumstance.

7. Material Considerations

- 7.1 Planning practice is clear on the role of material considerations, especially where a decision contrary to that which the development plan indicates is required, that is not the case here.
- 7.2 The material considerations cited below relate to national policy and guidance on the topic of electric vehicle charging infrastructure, sustainable transport, transport decarbonization, low carbon energy and battery energy storage. They provide a wealth of compelling evidence in support of this scheme.

National Planning Policy Framework 2024

- 7.3 Paragraph 7 is clear in stating:
- “The purpose of the planning system is to contribute to the achievement of sustainable development”.*
- 7.4 Paragraph 8 outlines the three overarching objectives to deliver sustainable development being economic, social and environmental. 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”.*



7.5 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”.

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.

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

7.6 Paragraph 11 confirms that:

“For decision-taking this means: c) approving development proposals that accord with an up-to-date development plan without delay”.

7.7 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”.*

7.8 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)”.*

7.9 Public EV charging infrastructure is required to support the transition to a low-carbon economy and a decarbonised transport system.

7.10 Paragraph 109 acknowledges that *“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”.*

7.11 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”.*

7.12 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.

7.13 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.

7.14 Paragraph 109 states:

“a) making transport considerations an important part of early engagement with local communities;

b) ensuring patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places;

c) understanding and addressing the potential impacts of development on transport networks;

d) realising opportunities from existing or proposed transport infrastructure, and changing transport technology and usage – for example in relation to the scale, location or density of development that can be accommodated;

e) identifying and pursuing opportunities to promote walking, cycling and public transport use; and

f) identifying, assessing and taking into account the environmental impacts of traffic and transport infrastructure – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains.”

7.15 Paragraph 110 states: *“The planning system should actively manage patterns of growth in support of these objectives [para 108]. 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 modes⁵. 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”.*

7.16 Paragraph 161 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”.*

7.17 This planning application includes both EV charging infrastructure and renewable energy utilisation and storage; it is inherently low carbon development.

7.18 Paragraph 168 is very clear on how the Council should be approaching what is inherently a sustainable development from any angle:

“168. When determining planning applications for all forms of renewable and low carbon energy developments and their associated infrastructure, 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 benefits associated with renewable and low carbon energy generation and the proposal’s contribution to a net zero future;

⁵ NPPF defines sustainable transport modes as including ultra low and zero emissions vehicles.



b) recognise that small-scale and community-led projects provide a valuable contribution to cutting greenhouse gas emissions”.

- 7.19 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.
- 7.20 Paragraphs 196 to 201 are clear on the need to reduce emissions and pollutants, for human health and environmental gain.

National Policy Statement for Energy EN-1 Jan 2024

- 7.21 Paragraph 5 of the NPPF outlines that National Policy Statements form part of the overall framework of national planning policy, and may be a material consideration in determining planning applications. It is important to consider their context and material when assessing the proposed planning application.
- 7.22 NPS EN1 paragraphs 4.2.4 and 4.2.5 have introduced a critical national priority (CNP) for the provision of nationally significant low carbon infrastructure. Low carbon infrastructure for the purposes of this policy means for other energy infrastructure, fuels, pipelines and storage infrastructure, which fits within the normal definition of “low carbon”.
- 7.23 The provisions of the NPS are a material consideration in s78 TCPA planning applications and weigh heavily in favour of new renewable and low carbon development.
- 7.24 NPS EN1 sets Criteria for Good Design for Energy Infrastructure, which must be read alongside NPPF policy on design (Para 135) and local plan policies guiding place, character and appearance (our emphasis):

“4.7 Criteria for good design for Energy Infrastructure

4.7.1 The visual appearance of a building, structure, or piece of infrastructure, and how it relates to the landscape it sits within, is sometimes considered to be the most important factor in good design. But high quality and inclusive design goes far beyond aesthetic considerations. The functionality of an object – be it a building or other type of infrastructure – including fitness for purpose and sustainability, is equally important.

4.7.2 Applying good design to energy projects should produce sustainable infrastructure sensitive to place, including impacts on heritage, efficient in the use of natural resources, including land-use, and energy used in their construction and operation, matched by an appearance that demonstrates good aesthetic as far as possible. It is acknowledged, however that the nature of energy infrastructure development will often limit the extent to which it can contribute to the enhancement of the quality of the area.

4.7.3 Good design is also a means by which many policy objectives in the NPSs can be met, for example the impact sections show how good design, in terms of siting and use of appropriate technologies, can help mitigate adverse impacts such as noise. Projects should look to use modern methods of construction and sustainable design practices such as use of sustainable timber and low carbon concrete. Where possible, projects should include the reuse of material”.



- 7.25 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.
- 7.26 The sector remains a novel one for the planning system with some local authorities starting their policy journeys with EV strategies which are focused 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, and Wiltshire is one of them.
- 7.27 The following are the key national policy documents which are material considerations in this case, further below are Wiltshire's material policy documents.

May 2020 Government Policy Paper 'Government vision for the rapid charge point network in England'

- 7.28 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 charge points 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'

- 7.29 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.
- 7.30 The CMA report clearly states that *"at least 10 times the current number of charge points are needed by 2030"*.
- 7.31 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.

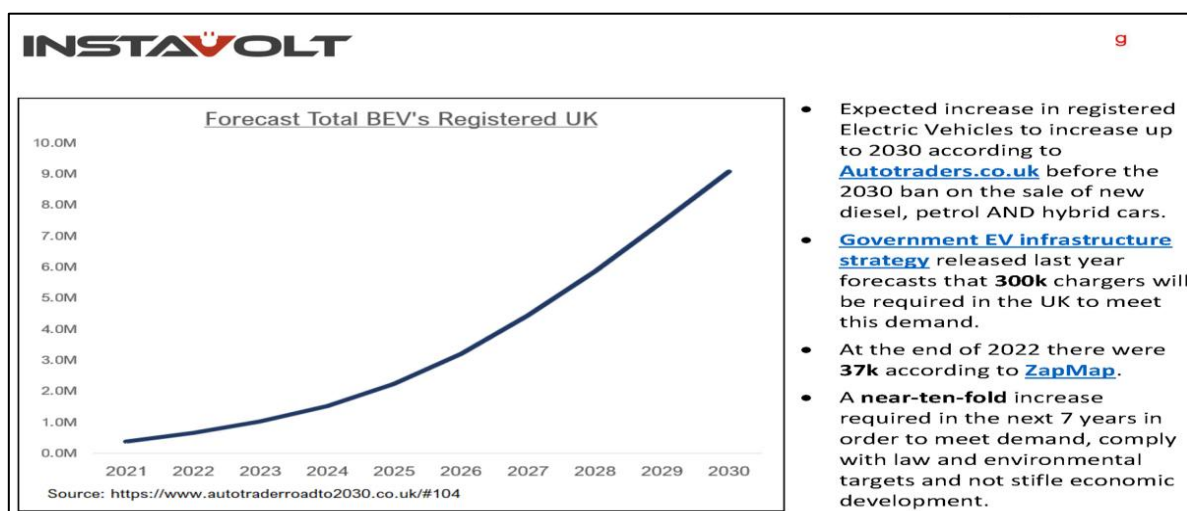
March 2022 Governments Electric Vehicle Infrastructure Strategy entitled 'Taking charge: the electric vehicle infrastructure strategy'

- 7.32 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.

- 7.33 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 refueling a petrol or diesel car, wherever you live’.
- 7.34 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.
- 7.35 The following compelling data shows the extent of the challenge to society, to which the planning system is being slow to respond (see below):



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

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



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	
• 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.

- 7.37 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

- 7.38 In January 2023, the Department for Business, Energy & Industrial Strategy, with Ofgem, published the Electric Vehicle Smart Charging Action Plan.
- 7.39 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".

- 7.40 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

- 7.41 In March 2023 the UK Government published a suite of documents under the collective title 'Powering Up Britain'.
- 7.42 Powering Up Britain is clear that:
"Energy security is one of this Government's greatest priorities".
- 7.43 It goes on to state that:
"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".
- 7.44 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".
- 7.45 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".
- 7.46 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)

- 7.47 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”.

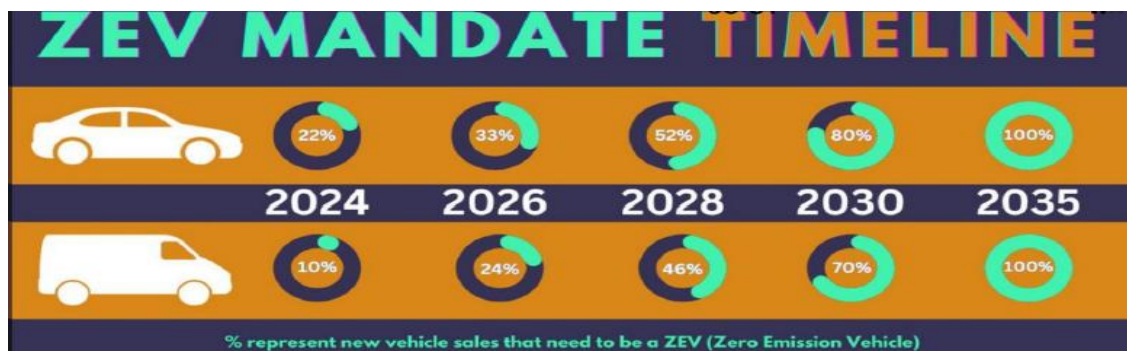
“6.31 Several respondents noted that consumers should feel as safe charging an EV as they do refueling at petrol forecourts. Respondents commonly identified lighting, CCTV, clear signage, shelter, proximity to amenities and choice of location as examples of elements we should consider mandating. Several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

- 7.48 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 fossil fuel cars, car manufacturers 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. 4.46 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.

7.49 The ZEV mandate in the UK requires that:

- 🐾 All cars and vans on UK roads must be fully electric by 2035.
- 🐾 Manufacturers must ensure that at least 28% of their new car sales are zero-emissions in 2025, up from 22% in 2024.
- 🐾 The mandate sets specific percentages of new zero-emission cars and vans that manufacturers must produce each year up to 2030.
- 🐾 The ZEV mandate is a legal requirement for car manufacturers to meet targets for new EV sales in the UK.
- 🐾 In April 2025, the UK government announced changes to the ZEV mandate, relaxing some rules to reassure the industry

7.50 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.

7.51 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

7.52 This statement continues by outlining the national policy stance on renewable energy and low carbon energy development which includes battery storage.

National Infrastructure Commission – Smart Power (March 2016)

7.53 The NIC prepared a report outlining how the UK market can better respond to its energy supply and demand. It concluded the need for 'smart power' providing interconnectivity, storage and demand flexibility to meet carbon targets and secure the supply of energy.



The report states:

"The benefits of storage could be substantial. It can help reduce the impact of peak demand, provide an outlet for power stations at other times of day, and ease constraints on our grids. Network owners are only just starting to make use of storage technologies. There is now enormous potential to make storage technologies an integral part of our networks. Network owners should be encouraged to see storage as a central tool to improve the capacity and resilience of their networks as part of a more actively managed system." (p35).

7.54 Page 38 of the NIC goes on to state:

"A key role for storage technology will be to provide some of the grid stability services needed to keep the electricity system resilient to unexpected events, such as a power station failing... Batteries and other storage technologies are also ideally suited to play this role as they can dispatch power extremely quickly, precisely matching the needs of the system. Battery technologies are already more effective than using existing power stations for some of these services, demand for which will grow as the electricity generation mix develops and an increasing share of generation comes from intermittent renewables such as wind and solar power".

7.55 This outlines the importance of battery storage to support the renewable energy mix in the UK.

Energy White Paper 'Powering our Net Zero Future' (Dec 2020)

7.56 The Energy White Paper recognises the movement towards renewable forms of energy however, it outlines that:

"to ensure that the system is also reliable, renewables need to be complemented by technologies which provide power, or reduce demand when the wind is not blowing, or the sun does not shine"

7.57 Further, it recognises the need to move away from gas-fired power stations that have previously provided flexibility to the grid to meet high demands and towards cleaner forms of energy storage such as batteries. It notes that this could help reduce consumer costs by preventing the need for expensive network reinforcement or additional electricity generation.

7.58 The White Paper goes on to state that it will support such forms of cleaner technologies required to support the renewable energy transition. Smart Systems and Flexibility Plan 2021

7.59 The plan sets out a vision, analysis and work programme targeting the delivery of flexible electricity systems to assist the transition to net zero by 2050 and provide energy security.

7.60 Page 37 of the White Paper states that battery storage is targeted to provide "significant flexibility to the system...and helping to address many of the challenges presented by a low carbon system, including maintaining energy security" by 2030. It continues:

"It [electricity storage] is essential to a net zero system as it can store electricity when it is abundant (e.g., when it is windy or sunny) for periods when it is scarce (e.g., when demand is higher)."



- 7.61 Page 5 of the plan notes that BEIS and Ofgem analysis shows around 30GW of carbon flexible capacity could be needed as early as 2030, and 60GW by 2050. There is a clear need for increased electricity storage to achieve these targets given that as of 2021 a total of 4GW of electricity storage was operational in Great Britain, of which just 1GW was made up of lithium-ion battery storage.

National Grid ESO 'Future Energy Scenarios' (2023)

- 7.62 This report outlines the investment required in new energy infrastructure to meet net zero by 2050 along with policy implications and how we consume our energy. It predicts a number of scenarios based on our societal change. The report states that:

"electricity storage will need to increase significantly to support the decarbonisation of the electricity system".

- 7.63 Across all scenarios outlined, battery storage is expected to make up the largest share of storage capacity by 2050. In the future it is anticipated that a much greater share of dispatchable sources of supply will come from other sources, such as electricity storage.
- 7.64 By 2030 we will need to increase from the 2022 baseline position of 3.5GW of storage capacity to between 17GW and 31GW. This drastic increase in estimations in such a short period of time demonstrates the need to adopt a greater number of renewable energy storage technologies and associated development, at a much quicker rate. The 2023 FES Report also provides a 'Fall Short' scenario in which we do not achieve net-zero by 2050, and even this scenario requires 13GW of storage capacity, a four-fold increase on the current baseline position. Furthermore, by 2050 energy storage will likely need to increase to between 37.5GW and 68.5GW to achieve net zero.
- 7.65 The UK Government has estimated that technologies like battery storage systems could save the UK energy system up to £40 billion by 2050. There is clearly an important and established need for battery storage which needs to be supported and expanded over the coming years/decades.
- 7.66 Regarding availability of sites, National Grid have a network of 298 Super Grid Transformer Substations, just over half of these currently have capacity to accommodate battery storage of the proposed site's scale. This identifies a clear shortage and the importance of the delivery of new battery storage sites.

NESO Clean Power 2030 (Oct 2024)

- 7.67 This report sets out the advice of the National Energy System Operator's to achieving clean power by 2030. As part of this a number of key priorities have been set out, one being 'Unlock flexibility of demand and supply' emphasising the importance of flexibility in a system of renewable power generation.
- 7.68 The clean power pathway sets a target of four-to-fivefold increase in demand flexibility including over 22GW of grid connected battery storage. It further sets out that:
- "Key supply-side technologies (e.g. offshore wind, onshore wind, solar, batteries) will all need to deploy more on average each year to 2030 than they have ever done in a single year before."*
- 7.69 There is also an emphasis on planning and consenting timescales to allow construction



within the next 6-24 months.

7.70 With regard to battery storage the report states at p23:

“Our pathways see battery capacity increase from around 5 GW in 2023 to between 23 and 27 GW in 2030. This represents a major scale-up in build rates, but there are many more projects in the pipeline. Batteries currently have a one-to-two-year deployment lead time and annual levels of deployment have increased every year since 2020. The principal role of batteries today is to provide within-day flexibility by cycling regularly to help match supply and demand. Additionally, they provide vital system services, such as frequency response, for which their role is likely to grow to 2030 as use of gas generation falls.”

Clean Power 2030 Action Plan (Dec 2024)

7.71 The Clean Power Action Plan for 2030 builds on the recommendations made by NESO and has been adopted by Government and includes key targets to achieve a clean power system by 2030. With regard to battery storage it outlines a requirement for 23 – 27GW of battery capacity by 2030 which is approximately 5 times the current installed capacity (Approx. 4.5GW).

7.72 This shows a significant demand for new battery storage systems to come online along with the importance of having a grid connection before 2030 to achieve this target.

7.73 The plan also sets out that the world is facing twin climate and nature crises which threaten global health, wealth and security. These are inextricably linked. Not only is the UK government committed to reaching net zero by 2050 and clean power by 2030, it is also committed to restoring nature, as demonstrated, for example, with the Environment Act targets in England to halt the decline in species abundance by 2030.

Planning Practice Guidance

7.74 In addition to the NPPF, PPG provides further guidance on Battery Energy Storage Systems within PPG ‘Renewable and Low Carbon Energy’ paragraphs 32 – 36.

7.75 Paragraph 32 confirms the need for this type of development where it states:

“Electricity storage can enable us to use energy more flexibly and de-carbonise our energy system cost-effectively – for example, by helping to balance the system at lower cost, maximising the usable output from intermittent low carbon generation (e.g. solar and wind), and deferring or avoiding the need for costly network upgrades and new generation capacity.”

National Policy Statement for Energy EN-1 (Jan 2024)

7.76 Paragraph 5 of the NPPF outlines that National Policy Statements form part of the overall framework of national planning policy, and may be a material consideration in determining planning applications. It is important to consider their context and material when assessing the proposed planning application.

7.77 In January 2024 the updated NPS (EN-1) was adopted which recognised the importance of storage where it states:

“Storage has a key role to play in achieving net zero and providing flexibility to the energy system, so that high volumes of low carbon power, heat and transport can be



integrated... Storage is needed to reduce the costs of the electricity system and increase reliability by storing surplus electricity in times of low demand to provide electricity when demand is higher. Storage can provide various services, locally and at the national level. These include maximising the usable output from intermittent low carbon generation (e.g. solar and wind), reducing the total amount of generation capacity needed on the system; providing a range of balancing services to the NETSO and Distribution Network Operators (DNOs) to help operate the system; and reducing constraints on the networks, helping to defer or avoid the need for costly network upgrades as demand increases."

- 7.78 NPS EN1 paragraphs 4.2.4 and 4.2.5 have introduced a critical national priority (CNP) for the provision of nationally significant low carbon infrastructure. Low carbon infrastructure for the purposes of this policy means for other energy infrastructure, fuels, pipelines and storage infrastructure, which fits within the normal definition of "low carbon".
- 7.79 The provisions of the NPS are a material consideration in s78 TCPA planning applications and weigh heavily in favour of new renewable and low carbon development.
- 7.80 NPS EN1 sets Criteria for Good Design for Energy Infrastructure, which must be read alongside NPPF policy on design (Para 135) and local plan policies guiding place, character and appearance (our emphasis):

"4.7 Criteria for good design for Energy Infrastructure

4.7.1 The visual appearance of a building, structure, or piece of infrastructure, and how it relates to the landscape it sits within, is sometimes considered to be the most important factor in good design. But high quality and inclusive design goes far beyond aesthetic considerations. The functionality of an object – be it a building or other type of infrastructure – including fitness for purpose and sustainability, is equally important.

4.7.2 Applying good design to energy projects should produce sustainable infrastructure sensitive to place, including impacts on heritage, efficient in the use of natural resources, including land-use, and energy used in their construction and operation, matched by an appearance that demonstrates good aesthetic as far as possible. It is acknowledged, however that the nature of energy infrastructure development will often limit the extent to which it can contribute to the enhancement of the quality of the area.

4.7.3 Good design is also a means by which many policy objectives in the NPSs can be met, for example the impact sections show how good design, in terms of siting and use of appropriate technologies, can help mitigate adverse impacts such as noise. Projects should look to use modern methods of construction and sustainable design practices such as use of sustainable timber and low carbon concrete. Where possible, projects should include the reuse of material".

Wiltshire Local Plan Review

- 7.81 Draft policy 70 concerns sustainable transport and states:



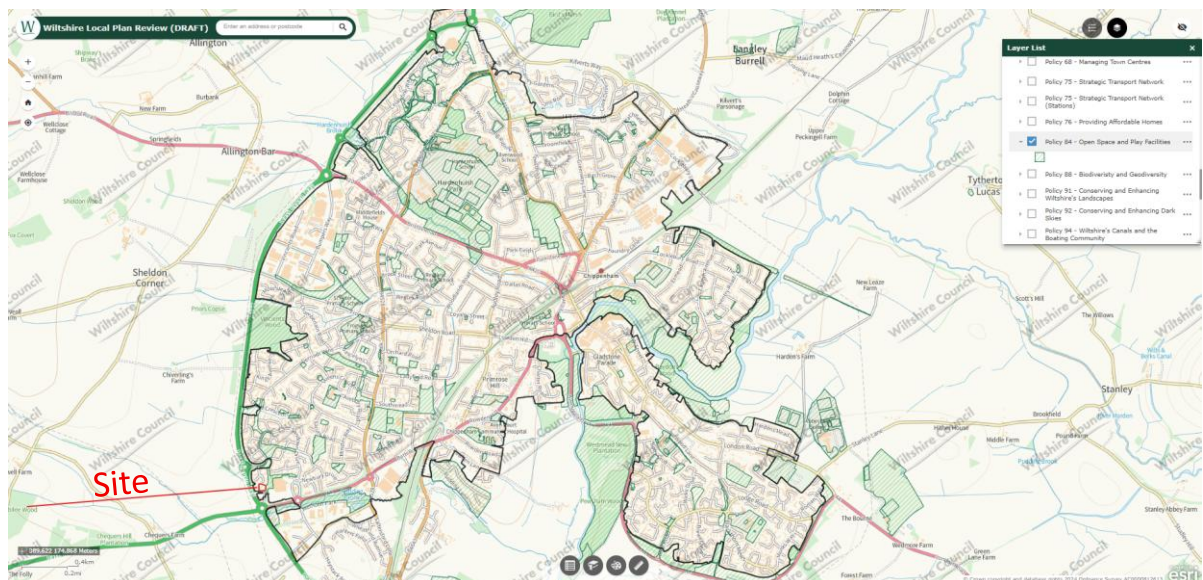
Policy 70

Sustainable transport

The council will seek to help people travel shorter distances and use sustainable modes in order to reduce transport carbon emissions, whilst recognising the need to keep the economy moving, and support the safe and efficient movement of people and goods within and through Wiltshire. This includes in rural areas where it is recognised that sustainable transport options are limited. This will be achieved by:

- planning significant developments in locations that are or can be made accessible by sustainable transport modes, including walking and cycling facilities;
- promoting walking, cycling and public transport to be the natural first choice for shorter and single journeys in urban areas;
- promoting appropriate demand management measures that reflect local circumstances and objectives working with partners;
- working with partners and others to deliver electric vehicle charging and other alternative fuel infrastructure;
- influencing the routing of freight within and through the county to ensure appropriate use of the Strategic and Primary Road Network;
- assessing and, where necessary, mitigating the impact of developments on transport users, local communities and the environment; and
- developing proportionate transport strategies for the Principal Settlements and Market Towns. These will be supported and implemented through private and public funding opportunities, including developer contributions, as well as joint working with partners and other stakeholders.

7.82 The local plan seeks to identify the site as open space. There is no shortage of draft identified open space for Chippenham:



7.83 The draft policy provides decision making criteria that are concerned with major development proposals:



Policy 84

Public open space and play facilities

All **major new development** must make provision for public open space and, where appropriate, play facilities. In addition, all development must protect and improve the quantity, quality, and accessibility of and to public open space.

All **major new development which will have an adverse impact upon the existing quantity, quality and accessibility of and to public open space** will need to submit an open space assessment with the planning application. This must be produced according to: the latest standards set out in the Wiltshire Open Space Assessment; other council strategies/studies covering different types of public open space including green and blue infrastructure and play areas; and relevant supplementary planning documents (or successor documents).

The open space assessment must ensure development will:

- a. provide new, replace or improve existing open space;
- b. identify and quantify the effects of development on the quantity, quality and accessibility of open space affected within Wiltshire and any neighbouring local authority's area if the public open space also serves it. Include impact on the amenity, character of the area and current and future needs;
- c. include how the developer will secure the management and maintenance of any new and/ or improved public open space. This will be secured by planning condition or legal agreement;
- d. provide new or replacement public open space on-site. If this is not possible, then provide off-site;
- e. show how locating new public open space or improving the quality of existing provides multifunctional benefits to help meet other relevant policies within the Plan e.g. relating to biodiversity, green and blue infrastructure, climate change, cultural heritage etc.

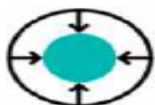
7.84 The Local Plan Review is not yet adopted, and therefore carries limited weight.

Wiltshire Local Transport Plan 4 Core Strategy March 2025

7.85 The LTP Core Strategy sets four areas of policy:

Policy areas

To deliver our LTP4 vision and objectives, a broad mix of policies is needed. We have defined four policy areas which provide the foundation and structure for our policies and measures. These four policy areas are based on the Avoid-Shift-Improve framework: this has been selected since it takes a holistic and balanced approach to sustainable transport, with a focus on improving the choices available. The four policy areas aim to:



Avoid unnecessary travel – giving people the choice to reduce the number and length of car trips needed through promoting digital connectivity, locating services, jobs and other destinations within closer reach and combining journeys.



Shift to more sustainable modes of transport – providing better and more accessible options for travel via active travel (including walking, wheeling including wheelchairs and pushchairs, cycling and horse riding), shared transport, and public transport.



Improve vehicle, fuel and network efficiency – through roll out of electric vehicles and charging infrastructure, alternative fuels and technology improvements.



Support and enable delivery of the Avoid, Shift and Improve policy areas – both now and into the future.

We have structured our LTP4 sub-strategies around this framework of Avoiding, Shifting and Improving travel patterns, alongside supporting measures. Each of these policy areas is essential for achieving our LTP4 vision and objectives; feedback from our initial round of engagement with stakeholders affirmed the need to strike a balance between them.



- 7.86 The LTP Core Strategy is clear on the current under-provision of public rapid charging infrastructure in Wiltshire:



In late 2023, there were **20,200 battery electric cars** licensed in Wiltshire. Wiltshire has a higher number of battery electric cars as a proportion of all cars (6%) compared with the South West region (4%) and England (3%).¹⁴

In terms of access to electric vehicle charging, there are currently 6 rapid devices and 29 fast devices provided by Wiltshire Council across the county. The increasing focus on a shift towards electric vehicles means that we are always searching for new locations for charging points.

Wiltshire Local Transport Plan 4 Electric Vehicle Infrastructure Sub-strategy March 2025

- 7.87 LTP4 sets out a range of policies and measures to support and facilitate EV transport. Measure I1.4 is pertinent in this case:

Policy I1: Facilitate and encourage move to low and zero emission vehicles.



Measure I1.4: Support the roll out of rapid charger hubs by the commercial sector, ensuring chargers are appropriately located and minimise any associated risks

Description

The council will enable the private sector in rolling out public rapid charging. Proposals will be supported where rapid charger locations meet traveller's needs and incorporate measures to minimise any associated risks.

Benefits

- The ability to rapidly charge an EV makes longer journeys possible and provides more public charging options for residents.

Possible locations

County-wide, but especially serving the major road network.

8. Conclusion

- 8.1 There is a climate emergency which requires “radical”⁶ positive action now. Net Zero, transport decarbonization and the ZEV mandate are also compelling considerations in support of this proposal.
- 8.2 Our review of the development plan shows clear and demonstrable on-balance compliance.
- 8.3 We are content that the range of material considerations discussed above are comprehensive and compelling and support the proposal.
- 8.4 NPPF paragraph 125 talks of environmental gains from development, in this case they are numerous:

⁶ NPPF paragraph 161



- ✦ Improved air quality (social and environmental gain)
- ✦ Reducing greenhouse gas emissions (social and environmental gain)
- ✦ Use of renewable energy (InstaVolt use 100% renewable energy in support of their developments) and support for low carbon technology (environmental/climate gain)
- ✦ Aiding the switch towards sustainable transport modes (social and environmental gain)
- ✦ Contributing to net zero and decarbonised transport (significant social and environmental gain)

8.5 We respectfully request that this proposed public EV charging hub be granted planning permission so that it can contribute to improving air quality, supporting economic development, and decarbonising Eden district without further delay.

