

Changes to various permitted development rights for EV charging **- Historic England response**

Introduction

Historic England is the government's statutory adviser on all matters relating to the historic environment in England. We are a non-departmental public body established under the National Heritage Act 1983 and sponsored by the Department for Culture, Media and Sport (DCMS). Historic England champions and protects 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.

Historic England welcomes the opportunity to respond to this consultation from the Department for Transport (DfT) on [changes to electric vehicle \(EV\) charging permitted development rights](#) including:

- Revising an existing right, allowing multiple equipment housing units for EV in non-domestic car parks.
- Introducing a new right for cross-pavement charging solutions.

Summary

Historic England strongly recommends, alongside existing and proposed restrictions:

- Exemptions for Article 2(3) land, e.g. conservation areas and World Heritage Sites.
- Expanding the proposed cross-pavement exemption for the curtilage of listed buildings to listed buildings themselves, given associated mounted charge points.

EV has the potential to bring significant benefits and can often be integrated successfully into historic places provided appropriate consideration is given to factors such as siting and impact on archaeology.

However, [Historic England's Streets for all guidance](#) states that new equipment and other public realm work requires an 'integrated townscape' approach in historic places, bringing together distinct authority functions (e.g. highways, planning etc) to develop clear local standards through, for example, local plans, travel plans and, where applicable, conservation area management plans. Area-based assets, for example, are particularly susceptible to the cumulative erosion of a streetscape over time which can result from inconsistent and piecemeal works enabled by a broadly applied blanket right.

Development of these standards can be supported by national guidance and enacted using local streamlining powers, such as Local Development Orders, which themselves remove the need for separate applications. Historic England is keen, for example, to support the development of EV guidance for conservation areas and listed buildings identified as an action by the Department for Energy Security and Net Zero (DESNZ) and the Office for Zero Emission Vehicles (OZEV) in the [government's response to the 2025 consultation on cross-pavement EV charging](#).

Questions – Equipment Housing

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

Neither agree nor disagree

- This response builds on [Historic England's response to the 2024 consultation introducing the equipment housing right](#) (qs.39-41).

Historic England raised concerns over the proposed 29 cubic metre size limit when the right was first consulted on in 2024. Car parks can retain historic surface materials, have archaeological potential, and form part of wider streetscapes in a range of complex rural, suburban and urban settings. The use of several smaller units could offer more flexibility in siting and screening, potentially reducing visual and archaeological impact, but nonetheless continue to carry risks including the proliferation of visual clutter that need to be considered holistically. Appropriate consideration requires exemption for Article 2(3) land. Consideration should also be given to conditions which could further limit impact including recessive / non-reflective materials, limiting individual unit size, controlling ancillary equipment (e.g. bollards, lighting etc), and ensuring siting and design, as far as reasonably practical, minimises impacts on the historic environment, including archaeology.

Questions – Cross-pavement charging

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

Neither agree nor disagree

- This builds on [Historic England's response to the 2025 consultation on EV, including cross-pavement charging solutions](#).

There is a clear rationale for cross-pavement charging, aiding those that do not benefit from off-street parking. However, solutions such as pavement gullies or under pavement cabling could lead to removal of modest but significant historic surfaces (e.g. cobbles, setts, flagstones, kerbstones) and introduce incongruous surface materials. Furthermore, broad application of a blanket right across these areas, without set standards based on a clear understanding of the local area, risks significant cumulative erosion of a streetscape over time through, for example, individual interventions into the highway using inconsistent approaches, designs, and longer-term maintenance and ownership models. Appropriate consideration requires exemption for Article 2(3) land, given the susceptibility in this instance of area-based assets to piecemeal interventions into the public realm.

Question 5: Do you agree or disagree that the new permitted development right should allow for an associated off-street EV chargepoint which is linked to a cross-pavement solution?

Neither agree nor disagree

Historic England has no objection to the principle of including an off-street EV chargepoint associated with the right, as the rationale is clear. However, given the likelihood of mounted charge points, the existing exemption for the curtilage of listed buildings needs to include the listed building itself to ensure continued alignment between the listed building consent and planning permission regimes.

Conclusion

Historic England is supportive of measures to integrate EV charging infrastructure into historic places and understand the rationale for solutions such as cross-pavement infrastructure. However, to be sustainable this rollout needs to consider impacts including the cumulative erosion of the character and appearance of historic places over time, necessitating a coordinated approach and robust design and implementation standards. This requires, alongside the existing proposed restrictions, an exemption for Article 2(3) land and an associated focus on supporting local authorities through national guidance and encouragement to use streamlining powers.

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