

Southend-on-Sea Borough Council

Electric Vehicle Charging Infrastructure for new development Supplementary Planning Document

Statement of Representations

October 2021

Introduction

This Statement of Representations has been prepared in accordance with Regulation 18(4)(b) of the Town and Country Planning (Local Development)(England) Regulations 2004.

This statement details who was consulted in connection with the preparation of the SPD and how they were consulted. It presents a summary of the main issues raised and reports how these issues were dealt with in the final version of the SPD.

Process of Production

Options for the draft SPD were presented to the Environment and Planning Working Party on 10th March 2021 and feedback took place with internal departments, in order to inform the content of the document prior to public consultation.

Public consultation

Formal consultation involved the following:

- Sending a letter or email notification of the consultation process to key stakeholders, bodies and associations, including residents, businesses and organisations on our Local Development Framework consultation database
- Publishing the document on our online engagement platform Your Say Southend [Your say Southend](#)
- Posting details on the Council's social media accounts – Facebook and Twitter
- Press article under Regulation 17 in the local paper
- Making the documents available for inspection at the Civic Centre main council office and libraries

The consultation ran for a four-week period between Friday 30th July and 5pm Tuesday 31st August 2021

A total of 541 people accessed the Your Say Southend page. Of those 541 people, 183 were informed which indicates they had visited the project page and viewed the survey and documents; 49 responded online; we received 4 hardcopy responses either by email or letter; and 469 people were aware (clicked on the project page) but chose not to comment or look at the survey or supporting documents.

The consultation included a survey with questions and a free text box for further comments requesting feedback on certain elements of the whole project.

A summary of the responses received are set out below. These responses have been fully considered, and where appropriate, changes made to the draft SPD prior to its adoption.

Comments Received on the draft SPD document

Name of Organisation	Summary of Representation	Council Response	Proposed Changes to the SPD
Natural England	<p>Thank you for your consultation on the above dated 30 July 2021, which was received by Natural England on 30 July 2021. Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development. Our remit includes protected sites and landscapes, biodiversity, geodiversity, soils, protected species, landscape character, green infrastructure and access to and enjoyment of nature. Whilst we welcome this opportunity to give our views, the topic of the Supplementary Planning Document does not appear to relate to our interests to any significant extent. We therefore do not wish to comment. Should the plan be amended in a way which significantly affects its impact on the natural environment, then, please consult Natural England again. Strategic Environmental Assessment/Habitats Regulations Assessment A SPD requires a Strategic Environmental Assessment only in exceptional circumstances as set out in the Planning Practice Guidance here. While SPDs</p>	Response is noted.	No changes are proposed to the SPD.

	are unlikely to give rise to likely significant effects on European Sites, they should be considered as a plan under the Habitats Regulations in the same way as any other plan or project. If your SPD requires a Strategic Environmental Assessment or Habitats Regulation Assessment, you are required to consult us at certain stages as set out in the Planning Practice Guidance.		
Historic England	Thank you for consulting us on the Council's Electric Vehicle Charging Infrastructure Supplementary Planning Document. I can confirm that while we do not have any specific comments at this stage, we will be interested in receiving subsequent consultations on this and related documents	Response is noted.	No changes are proposed to the SPD.
Chelmsford City Council	Chelmsford City Council (CCC) welcomes this SPD and the opportunity to comment on this consultation. CCC Local Plan adopted in May 2020 has a standard for electric vehicle charging points in residential (on plot and unallocated off-road parking) and non-residential development. CCC is also part of an Essex County wide working group reviewing the ECC Parking Standards from 2008. Standards for EV charging points for residential and non-residential development will be part of these new standards. Southend-on-Sea BC may wish to familiarise themselves with the draft proposals which are due to be circulated this winter/autumn to ensure consistency of	The SPD does not propose any new car parking standards and adopted car parking standards in the local plan continue to apply. In the event that Essex wide standards for EV charging infrastructure are produced as part of the review of car parking standards, Southend's SPD can be reviewed as appropriate. The Council reviewed current practice from a number of local authorities with similar characteristics	Minor amendments to the guidance for on-plot and allocated or communal parking are proposed on page 8 of the SPD, along with a consequent change to the worked example for residential development on page 9.

	<p>standards where appropriate. Specific comments</p> <p>The Residential Buildings section could perhaps be re-worded so that it is clearer whether the first para refers to on-plot parking and the second para to off plot parking. Also, it could be clearer whether the second para relates to any residential development with off plot parking of more than 10 parking spaces or just 'a building'.</p> <p>The requirements for non-residential buildings from 2023 and beyond appear to go beyond Government's proposals for 20% active spaces in non-residential schemes of more than 10 spaces (Electrical vehicle charging points in residential and non-residential buildings, HM Government, 2019). It would be helpful to understand what evidence is being prepared to support the proposed requirements which may be of benefit to other Local Planning Authorities also keen to promote greater provision of electric vehicle charging points in new development.</p> <p>It may also be helpful to include or signpost to information on existing and proposed charging infrastructure in the Southend-on-Sea BC area such as charge point types, and charging duration.</p>	<p>within London and the South-East, as well as current custom and practice within Southend. As the proposed policy is for a percentage of spaces to have EV charging infrastructure, gradually stepping up in provision over time, it is considered to be a proportionate approach for smaller developments where car parking is being provided. It should also be noted that where no car parking is proposed, the SPD will not apply.</p>	
Port of London Authority	Thank you for consulting the Port of London Authority (PLA) on the above mentioned SPD, which sets out the Councils requirements for electric vehicle charging infrastructure in new	Response is noted.	No changes are proposed to the SPD.

	development, and complements other actions being taken by the Council to decarbonise the economy and support the 'Southend 2050' ambition. I have now had the opportunity to review the draft SPD and can confirm that the PLA has no comments to make.		
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General Comments received via the survey form published with the draft SPD document

Note: No names were provided by survey respondents, but data on location was submitted by postcode (see survey question 2 below).

Summary of Representation	Council Response	Proposed Changes to the SPD
Why passive provision, just put them in now.	The support for EV infrastructure is welcomed. The SPD proposes an ambitious and progressive standard for residential and commercial developments to increase the number of EV charge points in the Borough, including a proportion of charge points when planning permission is implemented.	No changes are proposed to the SPD.
I had an electric car temporarily and at the time there were no charging points in Shoeburyness. We now have only 1 in Lidl but aside from that if you don't have a charging point installed in your property, (which for me is expensive as my space is not	The support for EV infrastructure is welcomed. The SPD relates solely to new residential and commercial	No changes are proposed to the SPD.

<p>directly by my property) then you have to drive into Southend and wait around for the car to charge. Not ideal and puts me off having an electric car in the near future.</p>	<p>developments and would not apply to on street charge points. However, the Council is committed to increasing the number of public charge points in the Borough.</p>	
<p>Will the generating capacity of the National Grid support increased use from EVs?</p>	<p>The Council is in discussions with National Grid to gain an understanding of future energy demand and infrastructure requirements, including to support electric vehicle charging.</p>	<p>No changes are proposed to the SPD.</p>
<p>7kW chargers are only good for domestic use, any commercial/public should be min. 22kW (fast) with some 50kW (rapid) - however rapids are approx. 8-10 times the price of fasts. Some text regarding "destination chargers" would be useful to encourage installation i.e. if a commercial building such as a Supermarket provides EV chargers then people will be more likely go there than the competitor that doesn't. Also there needs to be provision for users without off street residential parking such as chargers integrated into lamp posts. There should also be consideration to taxi companies being given targets for a percentage of new licences being EVs. What about EV buses? The provision of infrastructure (such as cable ducts) for future installations is a good idea. EV Chargers also need a good power supply infrastructure (UK Power Networks) and this needs to be factored into the size (capacity) of the power supply being provided for the new developments (EVs, electric heat pumps, etc) and this should be larger enough for all future chargers as the cost of future upgrades</p>	<p>The support for EV infrastructure is welcomed. The SPD requires 7KW charge points as a minimum and will be adequate to serve new dwellings. The Council will encourage developers of commercial buildings to provide rapid chargers wherever possible, particularly for major developments.</p>	<p>No changes are proposed to the SPD.</p>

could prohibit future charger installations. Battery storage, solar etc solutions should also be considered.		
EV charging infrastructure should also be a contingent for any new car parks or expansion of existing ones.	The support for EV infrastructure is welcomed. This will form part of an overall transport strategy in the new Local Transport Plan being prepared.	No changes are proposed to the SPD.
If we insist charging point are provided in every household, it will increase the cost of buying a home. Affordable homes are already blighted with various excuses, so this will make the problem even worse, What about Zero Carbon, Solar Panels, wind farms? All add to the cost.	There will be an additional cost to the developer of installing charge points, which may be passed on to the purchaser. However there would be longer term savings in running an electric vehicle.	No changes are proposed to the SPD.
We need to change the way we travel. Electric cars are just one option. We should put money into electric buses, cycle lanes and car and cycle hire schemes, park and ride areas. We need to incentivise this. Have more public EV areas.	The support for EV infrastructure is welcomed. This will form part of an overall transport strategy in the new Local Transport Plan being prepared.	No changes are proposed to the SPD.
New build is the easy one - what about all the propertied having loft conversions and extensions - implying an increase in occupants and probably cars - these conversions should be subject to the same requirements as new build.	Where planning permission is not required, the SPD would not apply.	No changes are proposed to the SPD.
More on street charging points should be made available	The support for EV infrastructure is welcomed. The SPD relates solely to new residential and commercial developments and would not apply to on street charge points. However, the Council	No changes are proposed to the SPD.

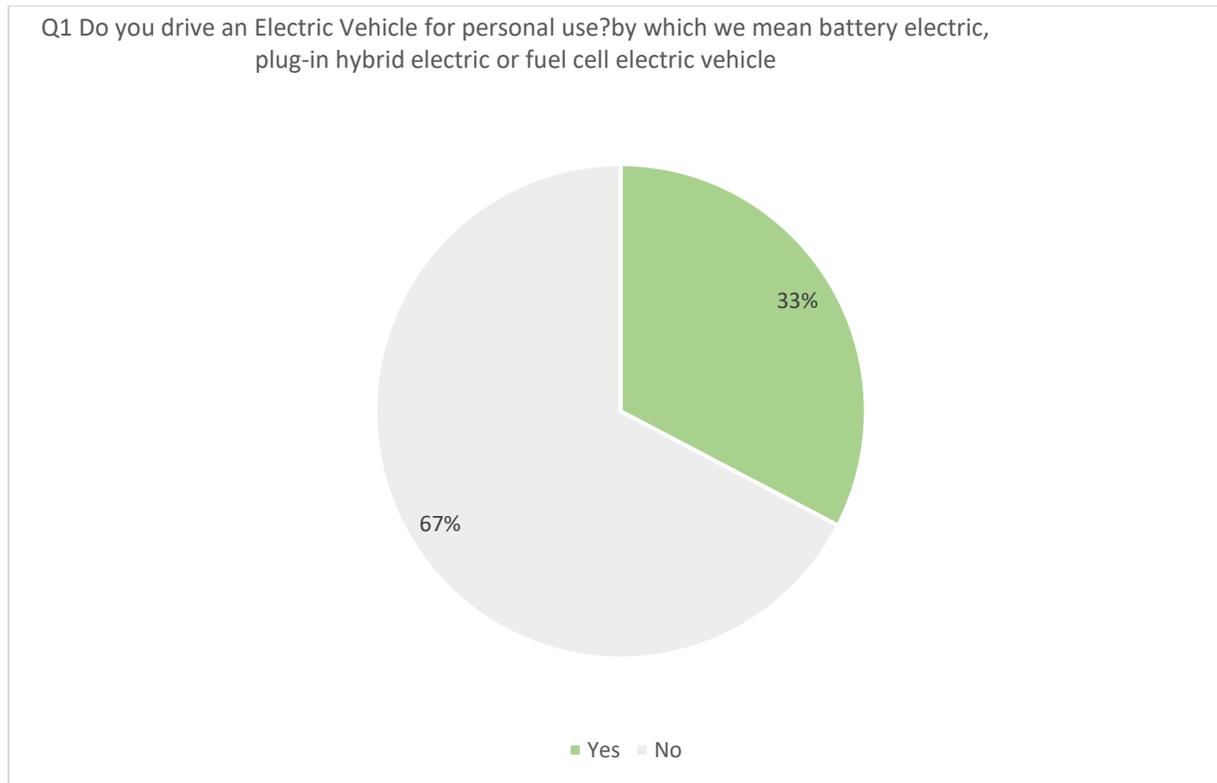
	is committed to increasing the number of public charge points in the Borough.	
New developments are pretty easy to plan for. Existing roads in Southend are not prepared for individual charging points, and they should not be deployed. For example, roads like Westminster Road have double parked cars.... The thought of running cables across pavements to cars is simply not an option. Developing charging stations is a great idea, but I don't know where they would go around Southend..... Leaving a car to charge, then coming back later is a difficult thing to implement..... By 2050, Hydrogen will be the fuel of choice plus solar energy will be more available on cars, so electrification for cars needs to be carefully implemented, and in a way that residential areas are not impacted. It's difficult	The difficulties of installing charge points for use in existing residential streets are recognised. The Council is looking at different options for public EV provision, but the SPD would only apply to residential and commercial development where new car parking spaces are proposed.	No changes are proposed to the SPD.
An EV charging point should be included in all new builds and conversions if we are to tackle climate change and reduce the damage already done to our planet.	The support for EV infrastructure is welcomed.	No changes are proposed to the SPD.
Existing properties really need to be considered, not just new builds. Currently in SS9 there are zero charging points. The nearest one in Hamlet Court Road has been shut for a Covid testing centre. Until SBC gets anything in place for the ±40% that are not privileged enough to have a driveway, residents will be forced to continue to drive polluting ICE vehicles and the council will continue to miss its emissions targets.	The difficulties of installing charge points for use in existing residential streets are recognised. The Council is looking at different options for public EV provision, but the SPD would only apply to residential and commercial development where new car parking spaces are proposed.	No changes are proposed to the SPD.
The policy needs to be driving EV use not just reflecting it. The policy needs to be integrated into housing policy, transport, planning. Southend does not do joined up thinking.	The SPD proposes an ambitious and progressive standard for residential and commercial developments to	No changes are proposed to the SPD.

	increase the number of EV charge points and planning, transport and housing colleagues are working together to achieve greater network coverage in the Borough.	
Southend has a huge stock of old housing with no off-street parking, what are you going to provide to encourage these owners/renters to buy into electric? Has anyone visited Braintree Gridserve, something like that on the outskirts of town would be an amazing resource as you could be confident you would be able to charge.	The difficulties of installing charge points for use in existing residential streets are recognised. The Council is looking at different options for public EV provision.	No changes are proposed to the SPD.
Would like to have them installed at the Civic office so that staff can charge their own vehicles. A useful incentive to be more environmentally friendly.	The difficulties of installing charge points for use in existing residential streets are recognised. The Council is looking at different options for public EV provision.	No changes are proposed to the SPD.
Is there a separate document for existing property? Almost everyone I know who cannot park their car directly in front of their house is asking "how will I charge an electric vehicle at home?"	The difficulties of installing charge points for use in existing residential streets are recognised. The Council is looking at different options for public EV provision.	No changes are proposed to the SPD.
Glad that it is finally being discussed.	The support for EV infrastructure is welcomed.	No changes are proposed to the SPD.
It's no good to provide plenty of charging locations if there is no control over parking. Many times charging bays are occupied by non-electric vehicles and are sometimes unreliable. I tried using the only Rapid charger in Southend opposite Sainsburys at the weekend and it was not working. So instead of getting a	The support for EV infrastructure is welcomed. The Council is looking at different options for public EV provision and will work with	No changes are proposed to the SPD.

<p>full charge in 40 minutes it took 4 hours. If there was more choice this wouldn't be an issue.</p>	<p>developers to encourage rapid charging points, particularly for major developments.</p>	
<p>We need more charging points around the town urgently. Especially in areas where the owner can go and do something while their car is charging - leisure centres, town carparks etc.</p>	<p>The difficulties of installing charge points for use in existing residential streets are recognised. The Council is looking at different options for public EV provision.</p>	<p>No changes are proposed to the SPD.</p>
<p>There are already 73 members in our Electric Vehicle FB group, and there are at least another 70 that we haven't spoken to yet. There are woefully few charging points in Southend, not just for our residents, but for people visiting our lovely town. I mainly charge on my way home from jobs or at home. I know that many of our members don't have home chargers though. I have been conducting my own air quality surveys around Westcliff-on-sea, and the air quality is abysmal.</p>	<p>The support for EV infrastructure is welcomed. The Council is looking at different options for public EV provision.</p>	<p>No changes are proposed to the SPD.</p>
<p>What about standards for the charge points themselves? Or are, for example, people just going to fit outside plugs.</p>	<p>The SPD sets out the minimum technical requirements for the EV charge points.</p>	<p>No changes are proposed to the SPD.</p>

Results from Survey on Your Say Southend

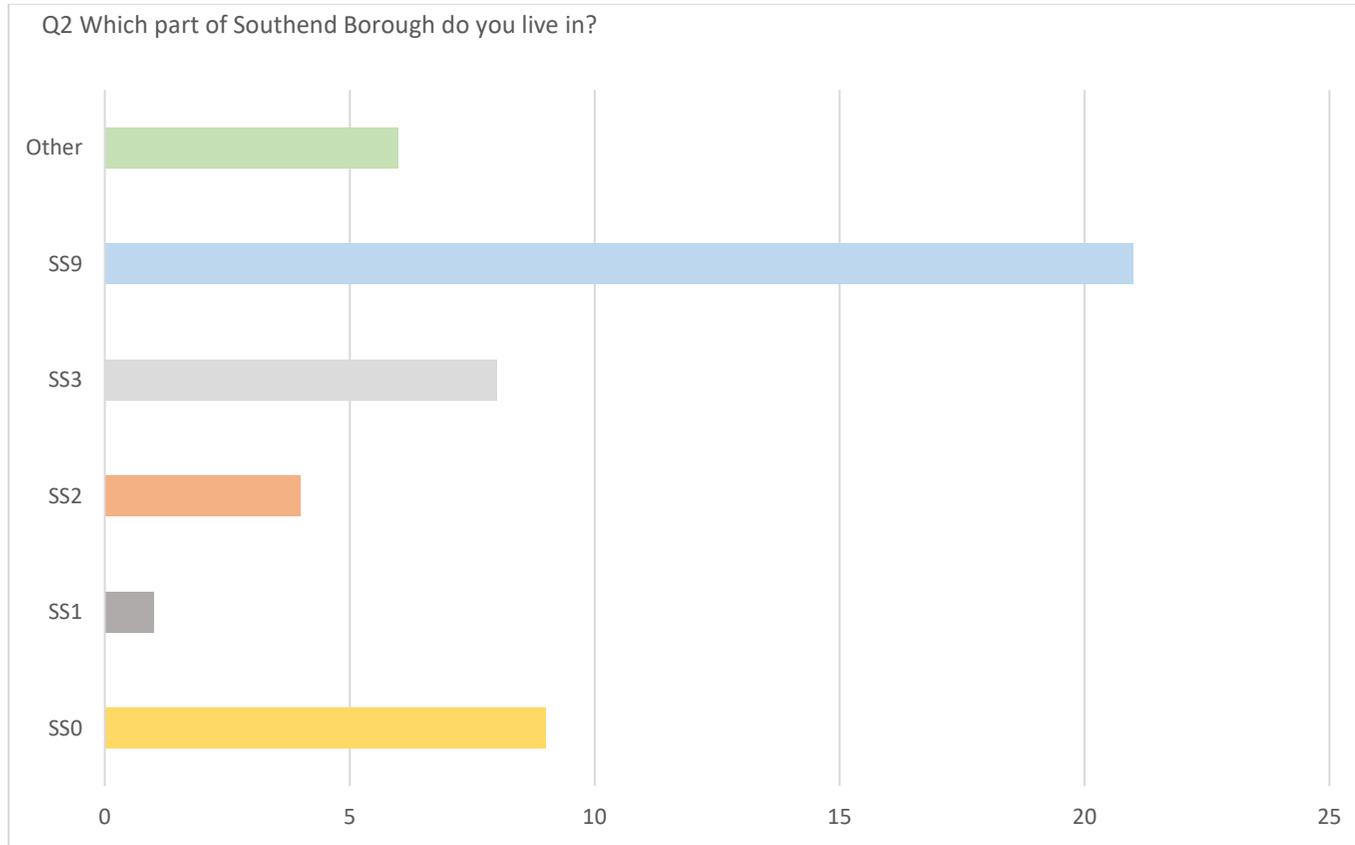
Q1 Do you drive an Electric Vehicle for personal use? by which we mean battery electric, plug-in hybrid electric or fuel cell electric vehicle?



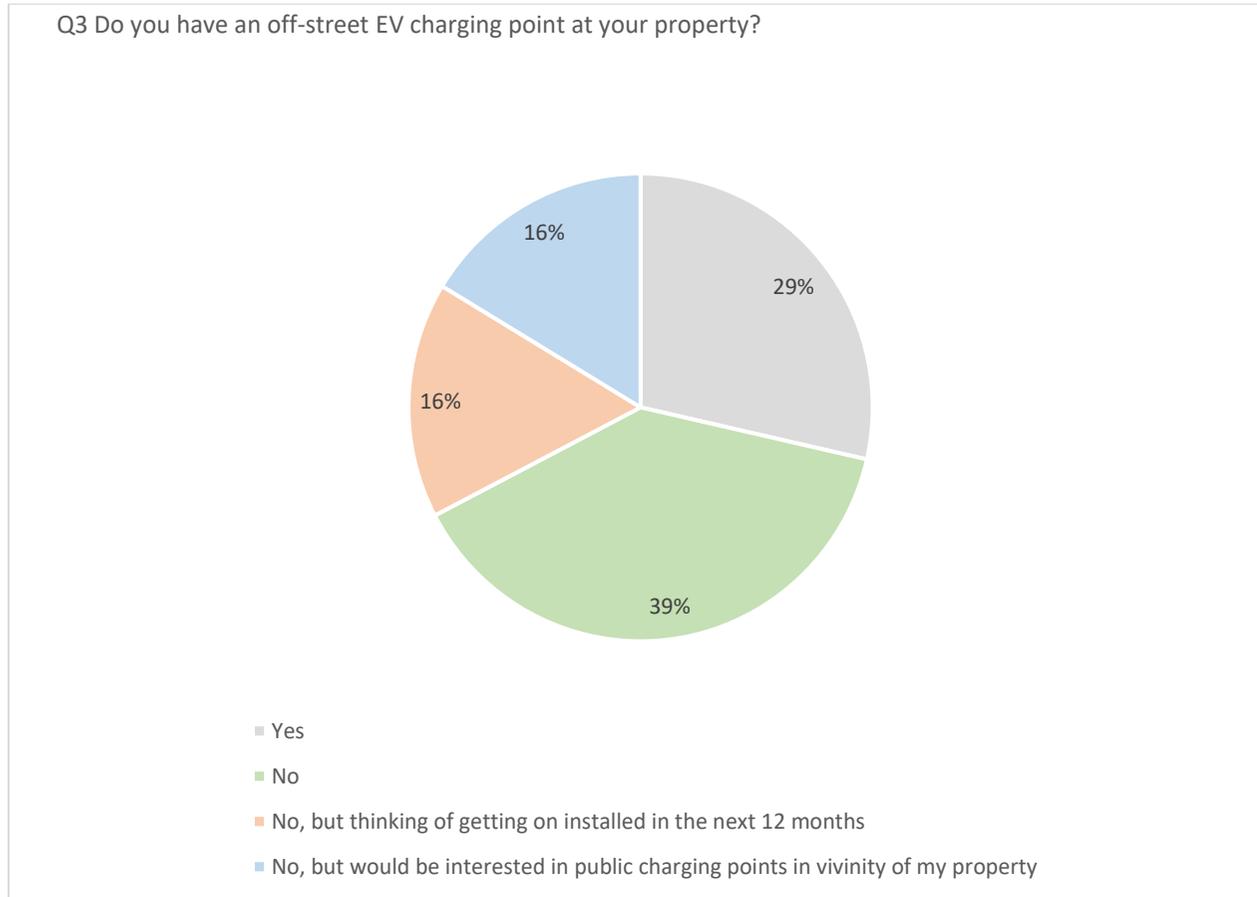
49 people responded to this question and of that number 67% already drive an electric or hybrid vehicle.

Q2 Which part of Southend Borough do you live in?

Please see the breakdown of those responding by the first part of postcode

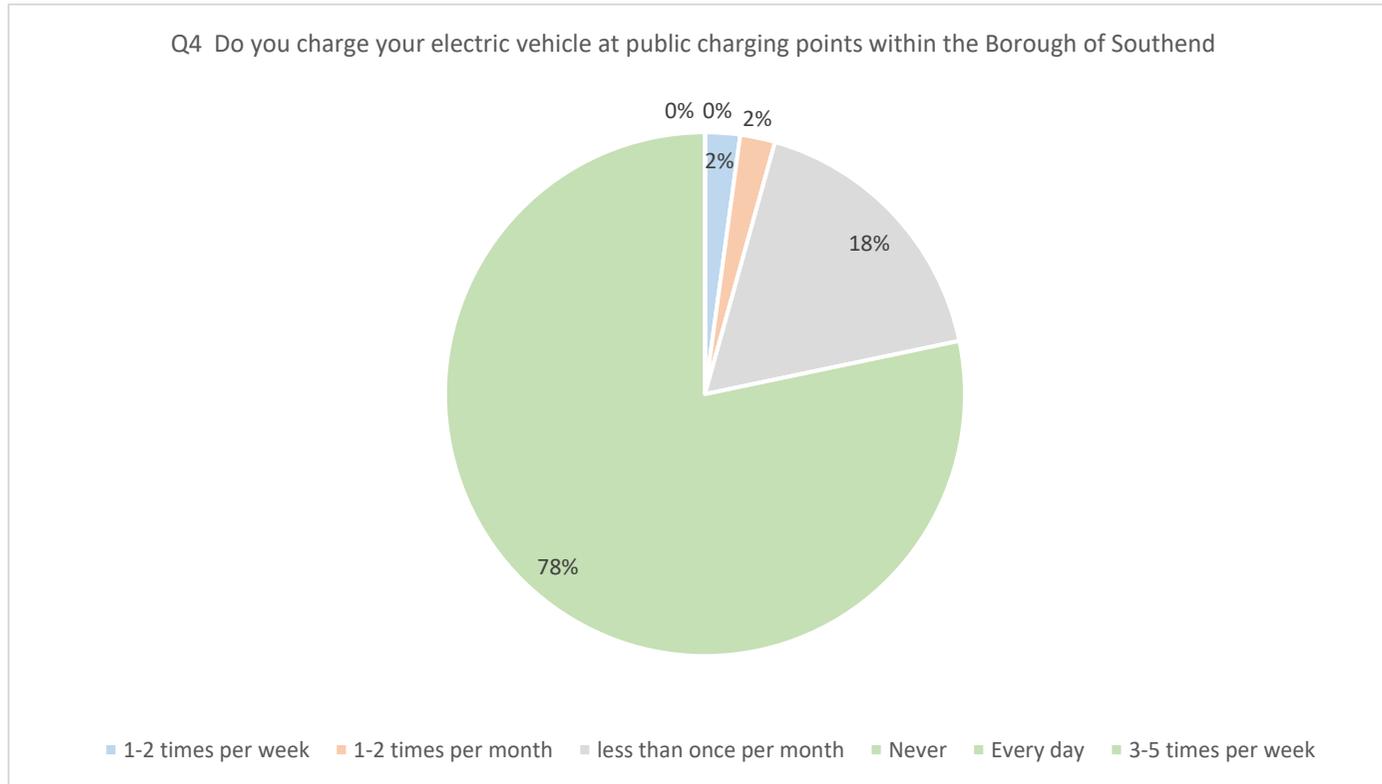


Q3 Do you have an off-street EV charging point at your property?



This was a single option response with 29% already having an off street charging point at their property and 32% of those responding are either thinking of getting one installed in the next 12 months or would be interested in an on-street charge point near their property.

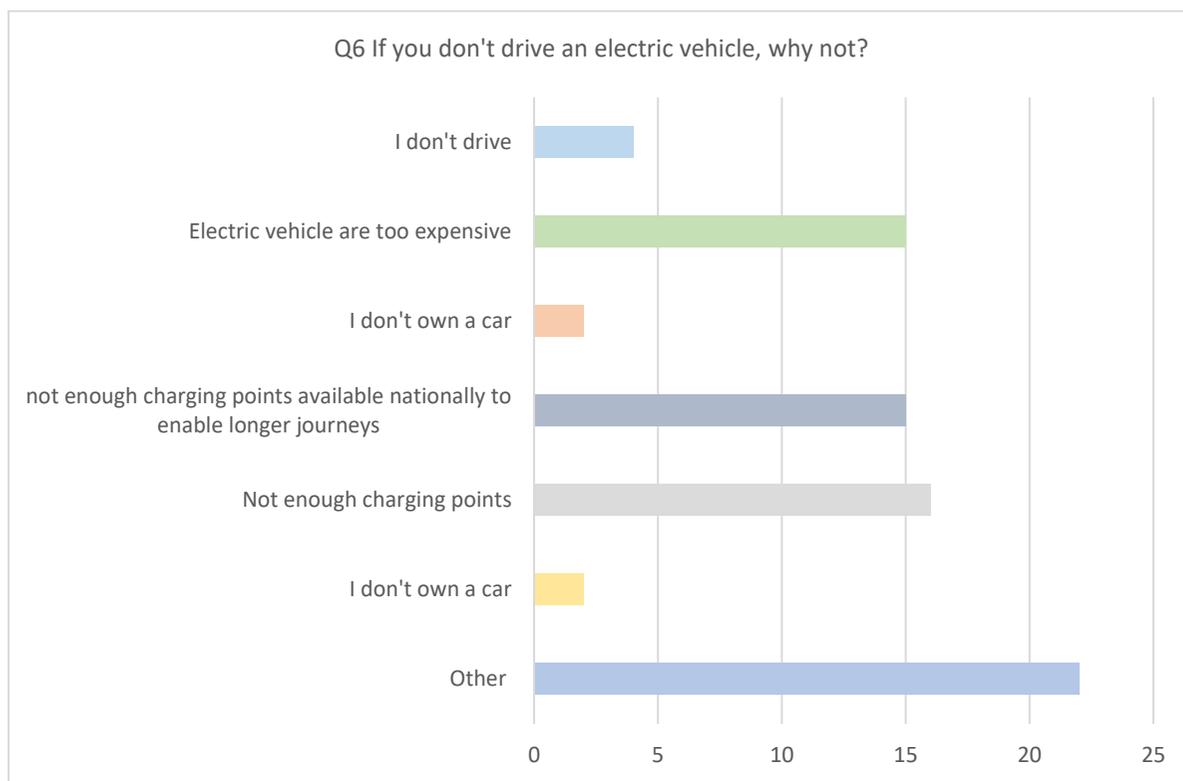
Q4 Do you charge your electric vehicle at public charging points within the Borough of Southend?



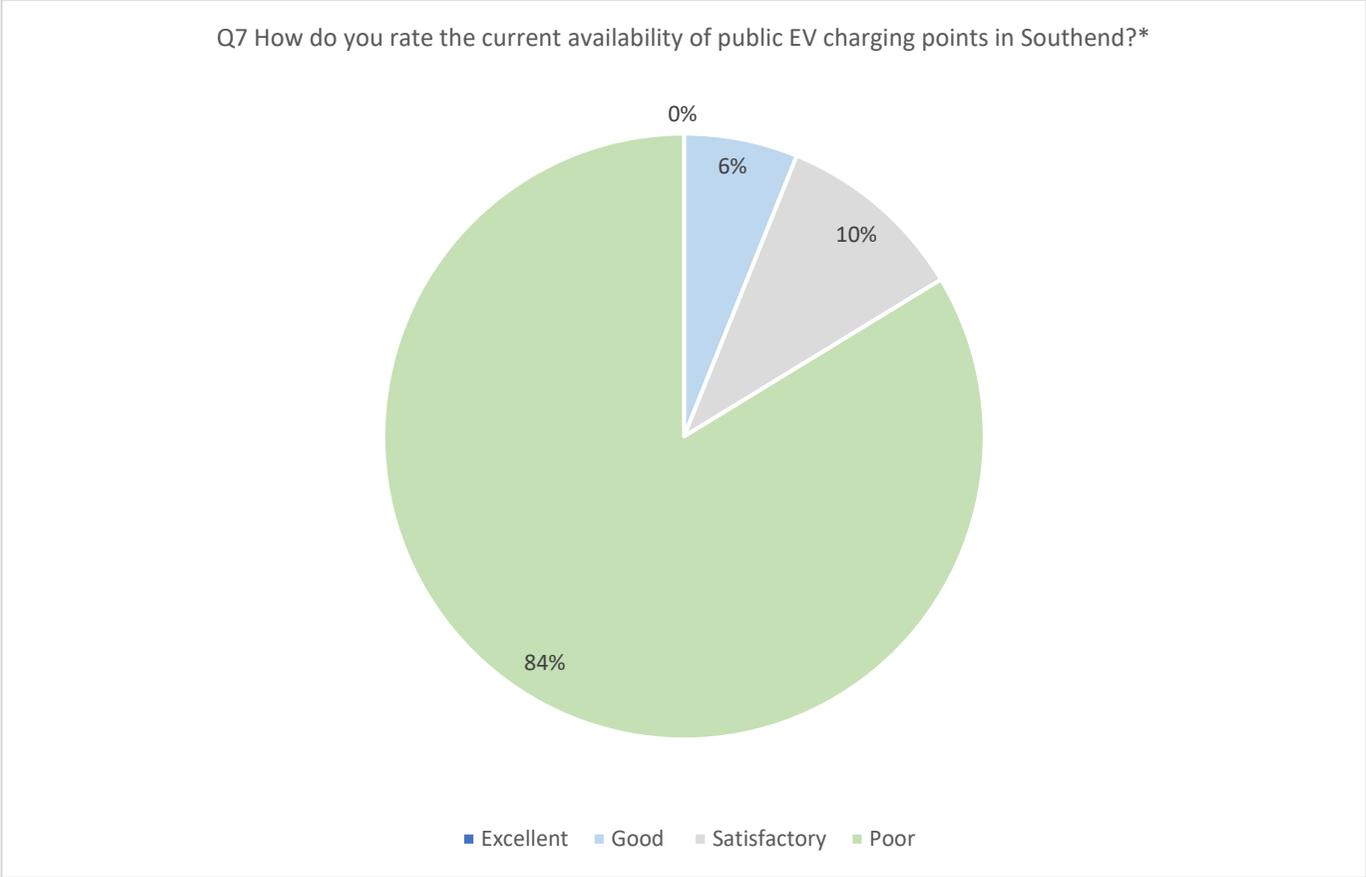
This was a single response with 18% charging their vehicle less than once a month within Southend and 78% never using them. This high figure may indicate that they have a charging point at their property and would not need to charge their vehicle on short journeys within the Borough of Southend.

Q5 – Are you a member of a car club? – Only 2% of respondents were or had been a member of a car club.

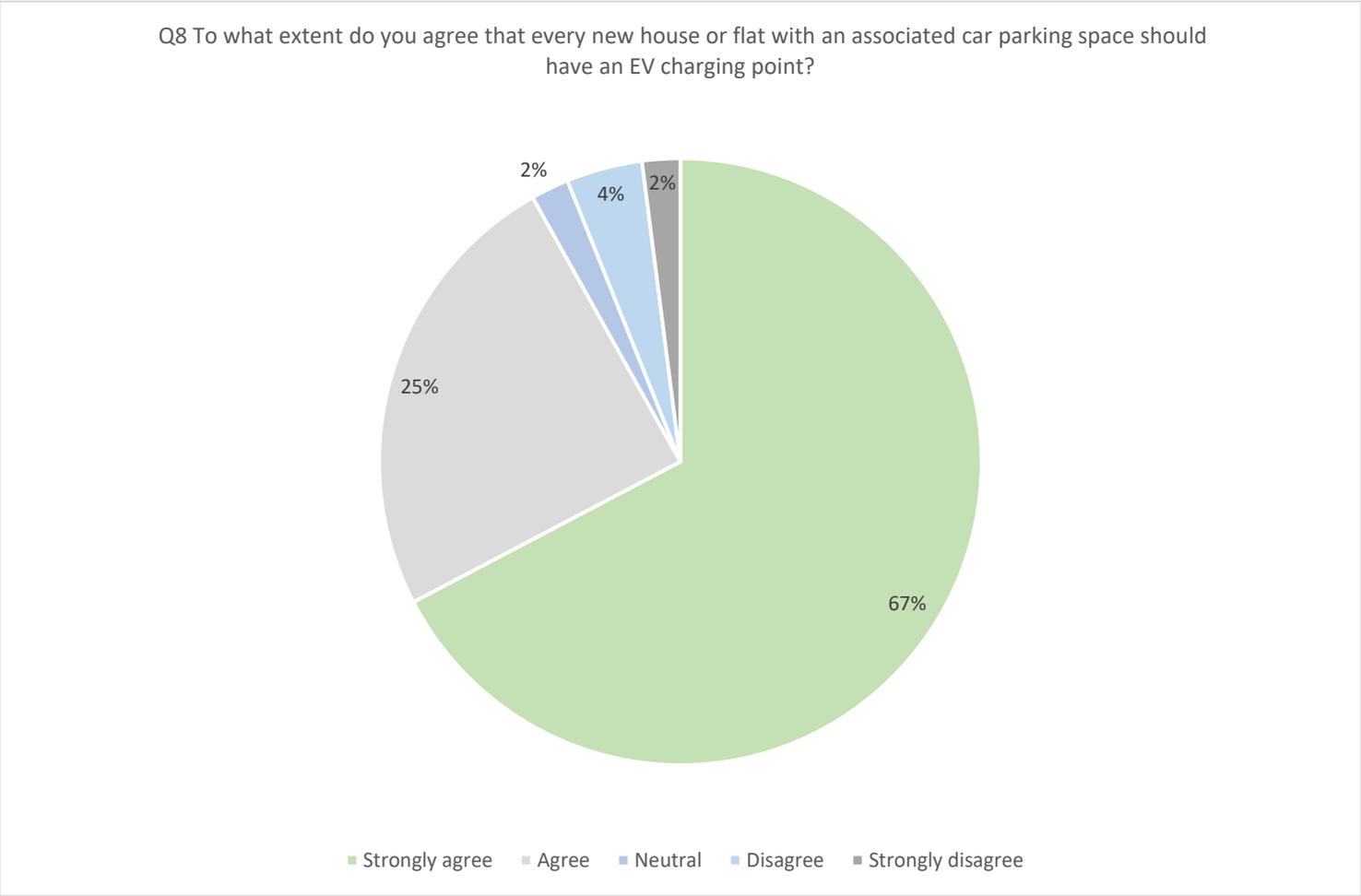
Q6 – If you don't drive an electric vehicle, why not? Tick all that apply. [there was an error with this question that required a mandatory answer – most respondents commented that they owned an electric vehicle so many chose to use “other” as a way of circumventing this]



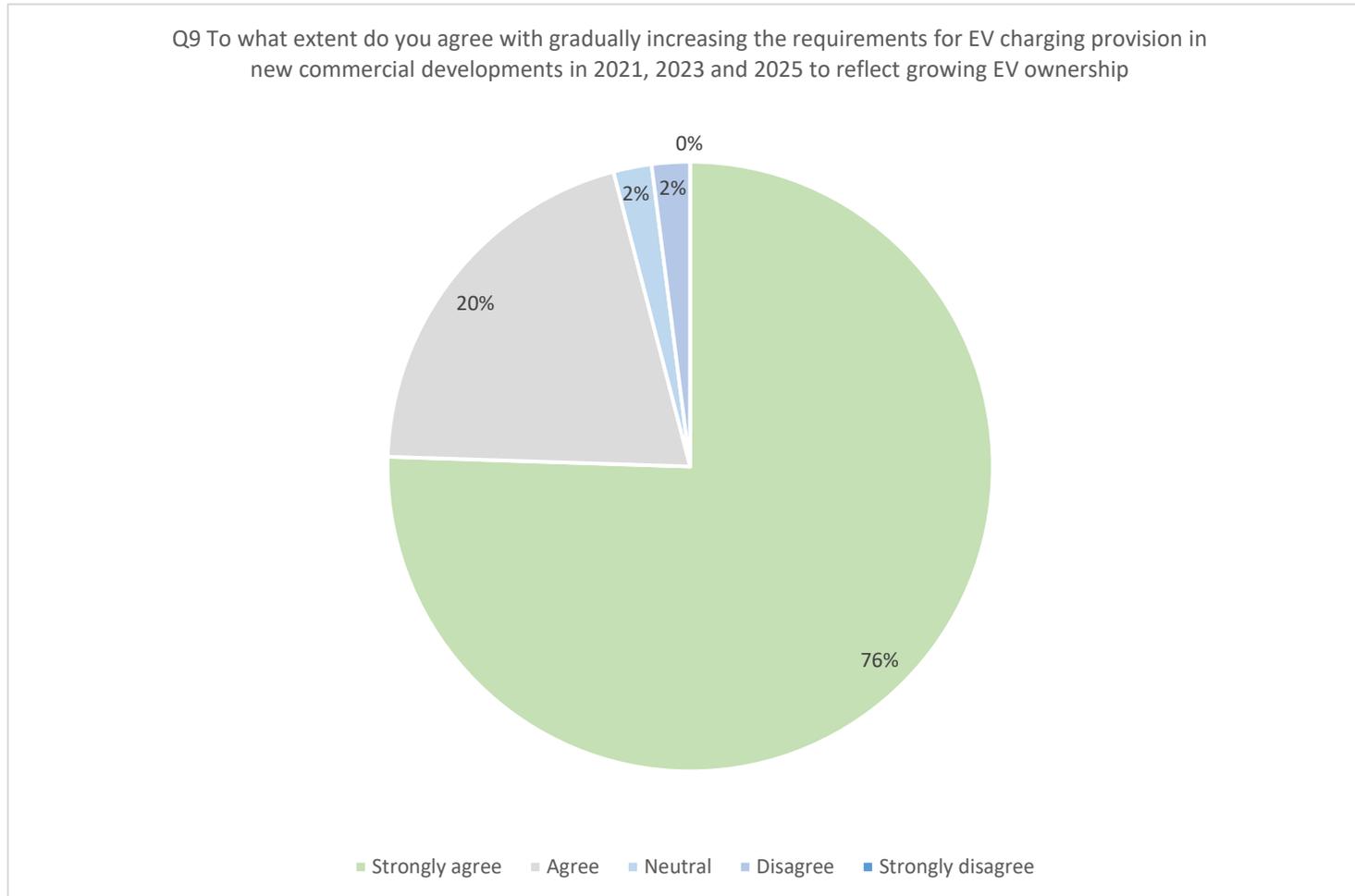
Q7 How do you rate the current availability of public EV charging points in Southend?*



Q8 To what extent do you agree that every new house or flat with an associated car parking space should have an EV charging point?



Q9 To what extent do you agree with gradually increasing the requirements for EV charging provision in new commercial developments in 2021, 2023 and 2025 to reflect growing EV ownership



Summary of Main Issues

Support

- Overwhelming support for EV charge points in new residential and commercial development
- Support for further EV charge points in existing residential streets
- Demand for public charge points throughout the Borough, including at leisure or shopping destinations and public car parks

Concerns

- Impact on cost of new housing
- Capacity of National Grid to cope with additional power demands from EV charging
- Difficulties in providing EV charge points for existing residential areas without off-street car parking
- Clarification sought in relation to evidence base to support SPD
- Just one aspect of sustainable transport and other measures such as electric buses, cycle lanes and park and ride areas also need to be considered

Recommendations

- Look for opportunities for more joined up working between planning, transport and housing colleagues within Southend-on-Sea Borough Council to expand the EV charging network in the Borough
- Consider potential for on-street and other public charging points for example through pilot schemes
- EV charging infrastructure should be part of a wider transport decarbonisation strategy including other measures to provide greater transport choice and reduce carbon emissions
- Monitor the effectiveness of the SPD to understand the extent to which it results in increased EV charging provision
- Review SPD as appropriate following Essex County Council review of car parking standards, incorporating standards for EV charge points

Proposed amendments to the draft SPD

Page and paragraph number	Existing Text	Proposed Text	Reason for Amendment
Page 3, paragraph 2	Air quality is also a problem with two Air Quality Management Areas designated along the A127 at The Bell junction and East Street/West Road junction.	Air quality is also a problem with two Air Quality Management Areas designated along the A127 at The Bell junction and the East Street/West Road junction.	Clarity
Page 3, paragraph 3	Reducing carbon emissions arising from use of petrol and diesel vehicles will therefore have positive local effects as well as making a contribution to UK and global targets, and supporting the use of electric vehicles (EV) within Southend will help to reduce carbon emissions from vehicle use within the town.	Reducing Action to help reduce carbon emissions arising from use of petrol and diesel vehicles will therefore have positive local effects as well as making a contribution to UK and global targets, and supporting the use of electric vehicles (EV) within Southend will help to reduce carbon emissions from vehicle use within the town.	Clarity
Page 5, Paragraph 3	The ambition is grounded in the values of Southenders, setting out what Southend-on-Sea should look like in 2050 and the steps needed now, and in the coming years, to achieve this. It is bold and challenging and will need all elements of the community to	The ambition is grounded in the values of Southenders, setting out what Southend-on-Sea should look like in 2050 and along with the steps needed now, and in the coming years, to achieve this. It is bold and challenging and will need all elements of the	Clarity

	work together to make it a reality.	community to work together to make it a reality.	
Page 7, Paragraph 2	A new local plan is being prepared and public consultation was carried out in Spring 2019 on an Issues and Options document.	A new local plan for Southend is being prepared and public consultation was carried out in Spring 2019 on an Issues and Options document.	Clarity
Page 8, Paragraph 1	Every new residential building with an associated car parking space to have a charge point (active provision). This requirement applies to buildings undergoing a material change of use to create a dwelling.	Every new residential <u>building dwelling</u> with an associated on plot car parking space to have a charge point (active provision). This requirement also applies to buildings undergoing a material change of use to create a dwelling.	Clarity
Page 8, Paragraph 2	Where there are more than 10 car parking spaces associated with the building, a minimum of one charge point should be installed for each dwelling, with enabling infrastructure (passive provision) for each remaining space.	Where there are more than 10 communal or allocated car parking spaces associated with the residential building, a minimum of one charge point should be installed for each dwelling, with enabling infrastructure (passive provision) for each remaining space.	Clarity
Page 9, Example 1 – Residential Development	A proposal for 2 dwellings and 4 car parking spaces will be required to provide 2 charge points.	A proposal for 2 separate dwellings and each with 4 2 on plot car parking spaces will be required to provide 2 charge points.	Clarity

<p>Page 9, Example 2 – Residential Development</p>	<p>A proposal for 6 dwellings and 12 car parking spaces will be required to provide 6 charge points and passive provision for the remaining 6 spaces.</p>	<p>A proposal for 6 dwellings flats within a single residential building and 12 communal or allocated car parking spaces will be required to provide 6 charge points and passive provision for the remaining 6 spaces.</p>	
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