AICES International Express

**Summary:**

# Response to the 'Solar on Car Parks and Electric Vehicle Charging' (Section 1 & 2)' Consultation.

**Submitted On Behalf of AICES Members**

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## Exemptions for Solar Canopy Mandate (Section 1)

- Clarification requested on the definitions of "public" and "private" car parks to determine whether operational vehicle parking areas at logistics sites are in scope.
- Recommendation to exempt operational logistics parking areas, as they differ fundamentally from general-use car parks in both structure and function, and are typically space-constrained and not suited to canopy installation.
- Support for limiting the mandate to new car parks only, due to the impracticality and high cost of retrofitting existing sites, particularly older logistics facilities with bespoke layouts and legacy infrastructure.

## Planning and Charging Infrastructure on Private Land (Section 2)

- Grid connection delays are a key constraint; securing capacity requires coordination with multiple bodies (DNOs, NESO, Ofgem) and can be slow and costly.
- Acknowledgement of planned grid reforms by Ofgem and NESO to accelerate connections; if delivered effectively, these could help address current delays.
- Need for a strategic, equitable approach to planning and power delivery, avoiding case-by-case delays and ensuring fair cost allocation.
- Majority of charging expected at private logistics sites, highlighting the need for planning frameworks to prioritise these locations for electrification.
- Wider infrastructure needs include:
  - Development of secure, rapid public charging infrastructure suitable for commercial vehicles, with adequate space, signage, and access.
  - Creation of national standards to support consistent local authority implementation.
  - Inclusion of commercial vehicles in government charging programmes.
  - Clear mapping of public chargepoints, identifying those suitable for vans and HGVs.
  - Strategic development of modern lorry parks integrated with multi-fuel refuelling (electric, biomethane, HVO, hydrogen), particularly along freight corridors and near ports and airports.
- Support for a UK strategic model aligned with freight connectivity priorities, similar to the EU's TEN-T framework.
- Certainty of supply for low-carbon fuels must be reflected in planning and policy, with the forthcoming DfT Low Carbon Fuel Strategy

## Planning for Energy Storage and Solar Integration (Section 2)

- Support for proposed planning changes allowing for taller upstands and equipment housing.
- Combined deployment of EV chargers, batteries, and solar is increasingly important to manage demand and ensure resilience at logistics sites.
- Planning uncertainty remains a barrier to deploying energy storage systems, especially when co-located with chargepoints.
- Planning policy should enable strategic infrastructure, such as logistics-focused refuelling hubs, to support the transition across the freight sector.
- Reinforcement of the need for low-carbon fuel security, particularly for operations relying on biomethane and HVO in the medium term.

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