



DESIGN
COMMISSION
FOR WALES
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CYMRU

28th November 2024

Building Regulations
Welsh Government
Cathays Park
Cardiff
CF10 3NQ

Dear Colleagues,

RE: Response to Consultation Electric Vehicle Charging in Residential and Non-Residential Buildings

The Design Commission for Wales welcomes the proposed use of Building Regulations to secure the provision of electric vehicle charging infrastructure.

The provision of electric vehicle charging points is important in supporting the decarbonisation of transport in Wales. Building Regulations would be an effective mechanism to secure the provision of charging points consistently across Wales. We support the application of the requirement to new residential and non-residential development, as well as buildings undergoing major renovations or material change in use. Our support for the proposal is subject to the following requirements being in place.

Whilst we support the principle of the proposals, there are factors requiring further consideration in the context of national and local policy in terms of development quality and placemaking. The design consequences of the charging points is important in this context and design proposals prepared should demonstrate such

consideration in terms of location, layout and integration. This must come up front in the design and planning process and must not rely solely on Building Regulations – which set a minimum standard.

The implications of the proposed requirements on the urban form of new development needs consideration. Much of Wales is characterised by terraced houses with on-street car parking. Terraced housing is a good building typology and can form the basis for successful new developments. Consideration needs to be given to how these urban forms of development can accommodate electric charging points that are convenient and affordable for residents.

It is important that the proposed interventions do not have the unintended consequence of dictating the urban form of new development. This could result in more lower density development, which encourages travel by car over walking, cycling and public transport options. The proposals need to reflect the sustainable transport hierarchy, prioritising active travel and public transport along with enabling the uptake of electric vehicles, and support placemaking and good urban design. National planning policy may need to be updated to provide a further policy direction on these important issues.

Finally, the proposals only relate to new development and where there is major renovation or change of use. This requirement will therefore only support a relatively small amount of properties and more needs to be done to support provision of charging points for existing properties. In particular, many existing homes and businesses in Wales do not have off-street car parking and need access to easily accessible and affordable charging points. Consideration needs to be given as to how people living in these properties can charge electric vehicles and what support/interventions the public sector needs to make to enable them to do so.

Overall, the Design Commission supports the proposals but we emphasise further consideration of the associated issues highlighted above. We also refer you to existing placemaking and design guidance relevant to the items above.

[Placemaking Charter](#)

[Placemaking Guide](#)

[Site and Context Analysis Guide](#)

[Planning for Sustainable Buildings](#)

[Design and Access Statements in Wales](#)

Please contact us should you require further information.

Yours sincerely,



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