ANNEX 7: Electric vehicle chargepoints

Regulatory scorecard

Part A: Overall and stakeholder impacts

1. Overall impacts on total welfare

Category	Description of impact	Directional rating
Description of overall expected impact	This policy aims to make it easier for Electric Vehicle ChargePoint Operators (EV CPOs) to install EV chargepoint infrastructure around England. It seeks to do so through granting EV CPOs the right to carry out street works through permits, which are cheaper and faster to apply for, instead of section 50 licences, which consist of considerably more costly and time-consuming application processes. Overall, the proposed measure is expected to positively impact total welfare. EV CPOs are expected to experience cost and time savings when installing EV chargepoints, meanwhile households are expected to experience greater regional equity in the availability of EV chargepoint infrastructure. Greater regional equity in EV chargepoint infrastructure is expected to incentivise demand in EVs (lowering waiting times at chargepoints), yielding societal benefits such as lower emissions, improved air quality, lower noise pollution, and jobs & economic activity associated with EVs and EV CPOs. However, EV CPOs and Highway Authorities (HAs) are expected to experience familiarisation costs with changes from section 50 applications to permit applications, and EV CPOs will now have to pay for an additional *Street Manager* annual registration fee. Unintended consequences from an increase in the number of organisations may generate societal impacts in the form of increased congestion from an increase in street works related to installing EV chargepoint infrastructure. However, any potential increase in congestion associated with increased installation of EV chargepoints in footways would only occur in the short term. The total number of EV chargepoints installations is expected to increase in the long run regardless of any policy change, but this figure is expected to increase faster in the short run under this new measure.	**Positive**
Monetised impacts	Over the 10-year appraisal period (2026-35) and discounted at a rate of 3.5% as per His Majesty's Treasury (HMT) Green Book guidance, the total Net Present Social Value (NPSV), is estimated at £7.85 million in the central scenario in 2025 prices and 2026 present value. Sensitivity testing estimates a total NPSV in the range of £5.30 million and £15.23 million in the low and high scenarios respectively. The monetised benefits are expected to greatly net off the costs. Monetised costs include: - Familiarisation Costs for HAs (direct) - Familiarisation Costs for EV CPOs (direct) - Street Manager annual registration fees for EV CPOs (direct) Monetised benefits include: - Application process time savings for HAs (direct) - Application process time savings for EV CPOs (direct) Application process cost savings for EV CPOs (direct)	**Positive**
Non-monetised impacts	All significant foreseen non-monetised costs and benefits have been discussed below.	**Uncertain**

	Unmonetised costs include: - Societal impact of an increase in the number of EV chargepoints (indirect). - Unintended consequences of increased congestion and road disruptions from an increase in the number of organisations installing chargepoints (indirect). - Coordination of Street Works Act (SWA) codes (direct). Unmonetised benefits include: - Improved efficiency and coordination of street works by HAs (indirect). - Improved ease of complying with street works regulations and avoiding Fixed Penalty Notices and charges for EV CPOs (indirect). - Increased EV usage and associated benefits (indirect). - Facilitation of the EV market and future innovation (indirect). Our preferred option also includes an amendment to legislation preventing HAs from requiring EV CPOs to apply for permission to conduct street works under section 115E of the Highways Act 1980 when installing EV chargepoints. We are introducing this change because, while non-statutory guidance states that this procedure is not required for EV CPOs, HAs often choose to do so regardless, which unnecessarily increases application time and costs for EV CPOs. We anticipate that this will yield benefits for EV CPOs in the form of improved efficiency, reduced application costs, and time savings. The above could not be feasibly monetised, largely due to limited quantitative evidence on the impact of street works on congestion, along with underlying uncertainty surrounding the implementation of the measure and assumptions used. This, combined with uncertainty surrounding the magnitude of these impacts, generates ambiguity around the overall direction of unmonetised impacts.	
Any significant or adverse distributional impacts?	We anticipate that there will be significant positive regional impacts for households, as the policy would improve regional equity in EV chargepoint infrastructure for consumers due to the increased rollout of EV chargepoints. Given that some areas of the country have very limited EV charging capabilities, increased rollout and thus regional equity in EV chargepoint infrastructure could now incentivise more consumers across the UK to purchase and use EVs. While there are no direct positive impacts of this policy on low-income groups, there are expected to be significant positive second-order impacts on the EV market, as we anticipate that this policy will facilitate the uptake of EVs and thus growth in the EV sector. Therefore, the costs associated with EVs may be reduced, which is likely to have positive distributional impacts. However, it is difficult to identify to what extent this would be due to this specific policy change and differentiate this from wider market trends.	**Positive**

2. Expected impacts on businesses

Category	Description of impact	Directional rating
Description of overall business impact	Overall, we anticipate that this measure will have a fairly significant positive impact on businesses. EV CPOs are expected to experience considerable time and cost savings from submitting permit applications compared to those for section 50s, in addition to improved regional equity and greater ease of complying with street works regulations (and thus	**Positive**

	avoid Fixed Penalty Notices and charges). However, in switching to permit applications, EV CPOs will experience some familiarisation costs in addition to having to pay annual registration fees for *Street Manager*. *Street Manager* is the digital platform through which EV CPOs will need to apply for permits to conduct their street works. While the business impact of this policy is expected to remain largely limited to EV CPOs, other businesses may be indirectly impacted too. The proposed policy change is expected to facilitate the development of the EV market and future innovation, generating greater certainty and income for that sector. However, the increase in organisations from this measure could generate more street works. This may increase congestion and thus increase journey times, thereby negatively impacting businesses around the country. Nevertheless, it is important to note that this increase in congestion is expected to occur in the short run, as works associated with EV chargepoint installations were expected to increase in the long run before the policy change. Chargepoints are also installed on footways/pavements so may not affect traffic in carriageways. However, this increase was expected to occur at a slower rate before the policy measure.	
Monetised impacts	Over the 10-year appraisal period (2026-35) and discounted at a rate of 3.5% as per HMT Green Book guidance, the total Net Present Business Value (**NPBV), is estimated at £7.21 million in the central scenario in 2025 prices and 2026 present value. Sensitivity testing estimates a total NPBV in the range of £4.86 million and £13.99 million in the low and high scenarios respectively. The Effective Annual Net Direct Cost to Business (EANDCB) is estimated to be - £0.84 million in the central scenario. Sensitivity testing estimates the EANDCB in the range of - £0.56 million and - £1.63 million in the low and high scenarios respectively.** Monetised costs to business include: - Familiarisation Costs for EV CPOs (direct) - Street Manager annual registration fees for EV CPOs (direct) Monetised benefits to business include: - Application process time savings for EV CPOs (direct) Application process cost savings for EV CPOs (direct)	**Positive**
Non-monetised impacts	Unmonetised costs to business include: - Unintended consequences of increased congestion and road disruptions from an increase in the number of organisations (indirect). Unmonetised benefits to business include: - Improved ease of complying with street works regulations and avoiding Fixed Penalty Notices and charges for EV CPOs (indirect). - Improved regional equity for EV CPOs (indirect). - Facilitation of the EV market and future innovation (indirect). Our preferred option also includes an amendment to legislation preventing HAs from requiring EV CPOs to apply for permission to conduct street works under section 115E of the Highways Act 1980 when installing EV chargepoints. We are introducing this change because, while non-statutory guidance states that this procedure is not required for EV CPOs, HAs often choose to do so regardless, which unnecessarily increases application time and costs for EV CPOs. We anticipate that this will yield benefits for EV CPOs in the form of improved efficiency, reduced application costs, and time savings.	**Uncertain**

	The above could not be feasibly monetised, largely due to limited quantitative evidence on the impact of street works on congestion, along with underlying uncertainty surrounding the implementation of the measure and assumptions used. This, combined with uncertainty surrounding the magnitude of these impacts, generates ambiguity around the overall direction of unmonetised impacts.	
Any significant or adverse distributional impacts?	The proposed measure is expected to cause significant positive regional impacts for businesses. Currently, there are extreme regional differences in application fees and processes for section 50 licences, meaning EV CPOs are unable to apply for them at all or must provide costly bonds when making applications. Standardising costs and application processes is expected to improve regional equity for EV CPOs, allowing them to better coordinate business activity across the UK. This could reduce operating costs and allow access to new markets, which could in turn improve profitability. The proposed policy is expected to also have a significant positive impact on small and micro businesses (SMBs), as it reduces the burdens faced by businesses regardless of size. There are no exemptions for SMBs, as the burden on them is proportionate and, were SMBs to be exempted, the policy would not realise its expected benefits. We expect that the majority of EV CPOs are classed as SMBs (as the industry is still in its infancy and there are few EV CPOs operating in the UK as of 2024). Considering that Street Manager fees are placed into bands according to the number of works businesses conduct, and that EV CPOs tend to conduct considerably fewer works than larger utility companies, they will also be facing lower fees.	**Positive**

3. Expected impacts on households

Category	Description of impact	Directional rating
Description of overall household impact	While we do not anticipate any direct impacts on households from this policy, we expect this policy intervention may indirectly improve regional equity for consumers and potentially lead to reduced costs of EVs, which will positively impact households. We expect this policy to improve regional equity for consumers as the faster rollout of EV chargepoints across all regions in the country will make it easier for consumers to use EVs in areas where a lack of EV charging capabilities may have originally dissuaded them from doing so. An increase in the uptake of EVs may enable the EV sector to grow, which could lead to reduced costs of purchasing an EV and thus positive distributional impacts. However, we are unable to identify the extent to which an increase in the uptake of EVs would be caused by the policy itself, as the sector is expected to continue growing regardless of any policy change. Additionally, there is no anticipated direct pass through to households as cost savings outweigh any new costs of the policy change. Moreover, increased street works associated with installing EV chargepoint infrastructure may increase disruptions impacting households, including increased congestion and emissions, etc. Once again, however, increased congestion from increased EV chargepoint installations is likely to be noticeable in the short run only, as an increase in installations was expected to happen over the long run regardless, albeit at a slower rate than before the policy change.	**Uncertain**
Monetised impacts	We do not anticipate any direct impact on households from this policy. Consequently, these have not been monetised. There is no household Net Present Value (NPV) or Effective Annual Net Direct Cost to Households (EANDCH) available.	**Uncertain**

Non-monetised impacts	There are no non-monetised costs to households specifically that have been identified. However, the primary non-monetised benefit that households would incur is the improved regional equity that consumers would experience from this policy change.	**Uncertain**
Any significant or adverse distributional impacts?	An increase in the uptake of EV vehicles and growth in the EV sector may reduce costs of EVs, which could have positive distributional impacts for those on lower incomes who wish to purchase an EV. We anticipate there to be large positive impacts on regional equity for households, as the faster rollout of EV chargepoints across all regions will enable more people across the country to own an EV, especially those in areas that currently have limited EV charging capabilities.	**Uncertain**

Part B: Impacts on wider Government priorities

Category	Description of impact	Directional rating
Business environment: Does the measure impact on the ease of doing business in the UK?	It is expected that this policy will increase the ease with which EV CPOs conduct their business. It is anticipated that this sector will become attractive for existing operators, though we are unable to attribute this solely to this measure as this is likely to be an indirect, second order impact. We anticipate that barriers to entry, especially in rural areas, will likely be reduced as regional equity is improved for EV CPOs and the demand for EVs in these areas may increase. Reduced barriers to entry, particularly lower costs associated with installing EV chargepoints, could also facilitate growth in the industry by incentivising more businesses to enter the EV chargepoint industry, increasing competition in the market. As this policy is expected to decrease costs of installing EV CPs greater funding should be available that could be used for greater investment in research and development and thus develop the EV market further through increased innovation. Overall, the impact of the policy on the business environment is expected to be generally positive.	**Will work for**
International considerations: Does the measure support international trade and investment?	While there are no direct international trade or investment impacts associated with this measure, as mentioned, increased demand in EVs and the positive impacts this has on the EV market may incentivise greater international investment into the UK EV market. However, we expect the overall impact is uncertain.	**Uncertain**
Natural capital and decarbonisation: Does the measure support commitments to improve the environment and decarbonise?	While this measure supports commitments to improving the environment and decarbonisation, this is through indirect, second-order impacts of the policy change that could not be quantified. The reason for this is that it is difficult to consider the specific increase in the uptake of EVs that this policy would have, since this is expected to increase moving forward regardless of any policy change. The overall impact on the environment is expected to be positive.	**Will work for**

Summary: Analysis and evidence

Price base year: 2025

Present Value base year: 2026

	Options		
Category	**1. Business as usual (baseline)**	**2. Do-minimum Option**	**3. Preferred way forward (if not do-minimum)**
Net present social value (with brief description, including ranges, of individual costs and benefits)	N/A	N/A	The NPSV for the preferred option is expected to be between £5.30million and £15.23million with a central estimate of £7.85million across the 10-year appraisal period. In the central estimate, the monetised costs are: - Familiarisation costs for HAs (£0.01million) - Familiarisation costs for EV CPOs (£0.06million) - *Street Manager* annual registration fees for EV CPOs (£0.37million) In the central estimate, the monetised benefits are: - Application process time savings for HAs (£0.66million) - Application process time savings for EV CPOs (£1.32million) Application cost savings for EV CPOs (£6.32million)
Public sector financial costs (with brief description, including ranges)	N/A	N/A	There are no financial costs incurred by the public sector.
Significant un-quantified benefits and costs (description, with scale where possible)	N/A	N/A	Where it is possible to estimate the scale of unmonetised impacts, this has been set out below. Unmonetised costs include: - Unintended consequences of an increase in the number of organisations installing chargepoints (indirect), including - National cost of

			increased disruptions from more street works installing EV chargepoints - Costs associated with developing a framework ensuring EV CPOs are verified before receiving SWA codes incurred by the Government. Unmonetised benefits include: - Improved efficiency and coordination of street works for HAs - Easier for EV CPOs to comply with street works regulations and thus avoid Fixed Penalty Notices (indirect) - Improved regional equity for EV CPOs (indirect) - Improved regional equity for consumers (indirect) - Facilitation of and future innovation from the EV market (indirect)
Key risks (and risk costs, and optimism bias, where relevant)	N/A	N/A	The main risk is uncertainty around EV chargepoint growth. To account for this uncertainty, three sensitivity tests are carried out on the following assumptions that underpin the EV chargepoint growth rate used: 1. Number of applications absent and under policy change 2. Time saved when completing applications for permits compared to those for section 50 licences 3. Application fees for both section 50 licences and permits
Results of sensitivity analysis	N/A	N/A	Sensitivity testing around the three key assumptions produces the following NPSVs: 1. Number of section 50 licence applications currently being made, and the anticipated number of *Street* Manager applications made under the policy change results in a NPSV between from £3.25million (low) and

			£23.78million (high). 2. Time saved completing permit applications compared to those for section 50 licences results in a range between £5.88million (low) and £9.83million (high) 3. Application fees for both section 50 licence applications and those for permits yields a range between £4.82million (low) and £9.81million (high)

Evidence base

Policy Background

1. One of the key Government missions is to make Britian a clean energy superpower.[1] Using clean energy for transport is fundamental to achieving this, with the transition to electric vehicles (EVs) playing a vital role to the Government's commitment to a greener future.

2. The previous Government held a consultation on a measure to speed up the approval process for the installation of EV chargepoints, aimed to incentivise the transition to zero-emission vehicles through accelerating and supporting equitable access to charging infrastructure.

3. The UK Government has set ambitious targets to meet net-zero greenhouse gas emissions by 2030. Transport is the largest emitting sector for UK greenhouse gas emissions. The majority (91%) of emissions from domestic transport came from road vehicles in 2020.[2] The transition to zero-emission vehicles is, therefore, vital to realising net zero.

4. As of October 2023, there were more than 49,000 public chargepoints in the UK, an increase of 42% from a year earlier.[3] Going forward, this number will continue to grow with the uptake of EVs, with the Government expecting there to be a minimum of 300,000 by 2030.[4]

5. The installation of EV chargepoints on the public road network is subject to various highways and consents procedures. The New Roads and Street Works Act 1991 (NRSWA) and the Traffic Management Act 2004 (TMA) require those carrying out street works to apply for either a permit or a licence under section 50 of NRSWA from the relevant HA before carrying out works. Permits are available to those with a statutory right

[1] First Mission Board focuses on immediate action to make Britain a clean energy superpower - GOV.UK (January 2025)
[2] Transport and environment statistics 2022 - GOV.UK (www.gov.uk) (January 2025)
[3] Electric vehicle charging device statistics: October 2023 - GOV.UK (www.gov.uk) (January 2025)
[4] Boost for electric vehicle drivers as 50,000 public chargepoints installed across the UK - GOV.UK (January 2025)

to carry out works on the highway, whereas those that do not can apply for a section 50 licence.

6. The previous Government consulted on a proposal to bring EV CPOs into the street works permitting regime by granting EV CPOs the right to carry out street works using a permit rather than a section 50 licence, with this consultation having closed on 12 April 2024. This should make it much quicker, easier and cheaper to install EV infrastructure, helping to deliver a more comprehensive and reliable network of EV chargepoints around England. In doing so, this measure will help ensure that everyone has access to reliable and convenient public charging wherever they live, making the transition to owning an EV easier than ever.

Problem under consideration

7. The installation of electric vehicle infrastructure on the public road network is classified as street works. Section 48 of NRSWA sets out the definition of street works. These are works of any of the following kind executed in a street in pursuance of a statutory right or a street works licence:
    - placing apparatus
    - inspecting, maintaining, adjusting, repairing, altering, or renewing apparatus, changing the position of apparatus, or removing it, or works required for or incidental to any such works (including breaking up or opening the street, or any sewer, drain or tunnel under it, or tunnelling or boring under the street)

8. Section 51 of NRSWA states that it is an offence to carry out street works without a statutory right or a section 50 licence.

Permits

9. Those with a statutory right who want to install or maintain water, gas, electricity or telecoms infrastructure on the public road network need to apply to the relevant HA for a permit to cover the works. A statutory right is granted by legislation such as the Electricity Act 1989, the Water Resources Act 1991, the Gas Act 1986 or the Telecommunications Act 1983. Organisations granted statutory right by these acts are often referred to as statutory undertakers (SUs).

10. HA permit schemes were introduced by Part 3 (sections 32 to 39) of the TMA. All but one HA in England have now set up a permit scheme, which must comply with the Traffic Management Permit Scheme (England) Regulations 2007 (the 2007 regulations) as amended.

11. A permit is approved in advance of works being carried out and helps the HA to coordinate the timing of the works to reduce any impacts on congestion. HAs also need to apply for permits for their own works.

12. Timing for the submission of permits and the time that HAs have to respond, as well as maximum fees that can be charged, is set out in street works permit schemes conditions statutory guidance.[5] Timings vary according to the type of works to be carried out, which is based on the planned duration of the works.

13. Those with a statutory right to carry out works must apply for permits through *Street Manager* – the Department for Transport's (DfT) digital service for planning and managing works.

14. *Street Manager* ensures consistent application of the legal requirements, so applicants provide the same information across England. DfT streams open data on when the works are planned/taking place and charge SUs and HAs for using the digital service. Organisations are put into bands based on the number of works they carry out or are carried out in their area. The lowest charging band is £1,000 per year.

15. Those carrying out street works under a permit (and a section 50 licence) also must comply with other legal requirements around safety, reinstatement of the road following the works, which must be guaranteed for 2 or 3 years, paying for a sample of their reinstatements to be inspected (£50 per inspection) and submitting start and stop notices to confirm when works have started/finished. *Street Manager* is also used for these services. Organisations can be fined for various breaches including:
    - insufficient safety requirements
    - working without a permit
    - breaching permit conditions
    - overrunning works

EV CPOs and section 50 licences

16. Most EV CPOs do not have a statutory right to carry out street works. Organisations that want to carry out street works but do not have a statutory right to do so need to apply for a licence under section 50 and schedule 3 of NRSWA.

17. The increasing installation of EV charging apparatus is already causing the number of applications for section 50 licences to rise.

18. Section 50 was not designed as a legislative tool to support the rollout of such major infrastructure projects. It was, essentially, to allow for ad hoc street works to be carried out by those organisations which do not regularly need to do this.

19. We know that the application process for section 50 licences and associated costs vary greatly between HAs. Some HAs required bonds before licences are granted and others have extensive requirements in terms of information they need to be sent before an application will be approved. As a result, installing apparatus under a section 50 licence can be a lengthy and costly process, hindering the efficient rollout of infrastructure

[5] Street works permit schemes conditions - GOV.UK (www.gov.uk) (January 2025)

projects. Each licence could cost between £500 and £1,000 on average and can take 12 weeks or longer to obtain.[6] Each HA will have its own application process and while most are online, some are not.

20. Section 50 licences are not currently included within *Street Manager*. This means that not all licences can be found online, which reduces the HA's ability to coordinate, and plan works on the highway. Some HAs add them voluntarily to *Street Manager*, but not all do so.

21. The current process for section 50 licences often leaves the HA and the licence holder without any clear direction about who will take responsibility for the repair and maintenance of the apparatus after it has been installed. As a result, some HAs are unwilling to grant section 50 licences until this has been agreed, and this can add to delays.

22. Those who need section 50 licences should ensure they apply for them in good time and that they work with the relevant HA to let them know about any major projects that are being planned. Unlike permits, one section 50 licence can cover several installations across several streets.

23. Issues relating to section 50 licences can impact the ability of some CPOs to install chargepoint infrastructure, particularly if they are operating on a regional or national scale, due to the uneven geographical distribution of charging apparatus around the UK.[7] They can also add delays in rolling out infrastructure. Permits are a quicker, cheaper and less resource-intensive process for applying to perform works on the highway than bespoke section 50 licences.

Other requirements

24. Under both the permitting and section 50 licencing regimes, the organisation carrying out street works must comply with other requirements set out in NRSWA. These include:
    - section 60: general duty of undertakers to cooperate
    - section 65: safety measures
    - section 70: duty to reinstate
    - section 75: inspections
    - section 81: duty to maintain apparatus
    - section 82: liability for loss or damage caused

25. The HA has a power under section 75 to inspect works being carried out and reinstatements for compliance with the:
    - safety code
    - Specification for the Reinstatement of Openings in Highways (SROH)

[6] Also see Issuing section 50 street works licences (www.gov.uk) for more information on section 50 licence fees.

[7] Electric vehicle public charging infrastructure statistics: April 2024 (January 2025)

26. The HA can charge organisations carrying out street works £50 per unit of inspection, which is based on the duration of the works. Inspections can be carried out:
    - while works are taking place
    - up to 6 months later
    - up to 2 years later or 3 years for deep excavations

27. If the HA finds a defective reinstatement, they can charge £120 for a follow-up inspection to check that it has been repaired. It is a requirement under NRSWA for there to be always a qualified operative on site while street works are in progress. The qualifications held must be appropriate for the work being carried out. NRSWA also requires that the site be supervised by a person having a prescribed qualification as a supervisor. The supervisor is not required to be always on site.

28. Neither a permit nor a section 50 licence is required for installation works on private land/roads.

Section 115 of the Highways Act 1980

29. Section 115B the Highways Act 1980 (the 1980 Act) allows a HA to place objects or structures on the specified types of highway to, among others, provide a service for the public. Section 115E allows the HA to grant permission to another person to do anything it can do under section 115B.

30. However, permission to place a structure on, in or over a highway that will result in the production of income cannot be given unless the HA has first obtained the consent of 'frontagers with an interest' to where the object is placed and the purpose for which it is used. 'Frontagers' means owners and occupiers of premises who might be affected by the structure being located either wholly or partially between their premises and the centre of the highway.

31. We are aware that some authorities may be asking EV CPOs to apply for permission under section 115E of the Highways Act 1980 in addition to the section 50 licence or permit. It should be noted that section 115E permission is not necessary if the organisation installing the chargepoint has either a pre-existing statutory right to carry out the street works or a section 50 licence. Only a statutory right or a section 50 licence is required.

Rationale for intervention

32. Under the current situation, EV CPOs face a longer, more expensive, and more difficult process of applying to be able to undertake street works. This results in Government failure in the form of *'red tape'*, as the Government has failed to account for technological advancements in its rules and regulations around SUs. This Government failure has caused several market failures to arise, predominantly around *equity* and *coordination failure.*

33. The process of applying for street works permits is set out in statutory guidance and regulations made under the TMA. Permits are available for utility companies who have statutory rights to carry out works (and are known as statutory undertakers). At the time, EVs were in a nascent stage and so no specific provisions were made for the EV sector. EV CPOs are not regulated in the way as statutory undertakers. Over the last 10 years, there has been a significant development of the EV sector, where EVs are more accessible to the general population. However, the process for EV CPOs to undertake street works has not changed to reflect the growth and importance of the sector, which reflects Government failure.

34. There is no standardised approach for applying for section 50 licences across HAs in England; processes, response times and licence fees all vary between HAs, meaning that EV CPOs that may operate on a national scale will face different approaches in different regions. Some HAs refuse to deal directly with EV CPOs, sometimes insisting on installers to find an existing Statutory Undertaker to sponsor the works and apply for a permit. These all contribute to significant differences in uptake across the country. Additionally, the process of applying for Section 50 licences is more expensive in terms of cost and time than applying for permits using *Street Manager*, a platform designed to centralise and simplify applications. The inability for EV CPOs to access *Street Manager* represents a Government failure in the form of *red tape.* Government intervention to amend the existing regulation to standardise processes will create a level-playing field and allow EV CPOs to overcome obstacles and increase their output, allowing for EV market growth and speedier roll-out.

35. This Government failure has exacerbated market failures. Firstly, there is a lack of equity in EV chargepoint installation. DfT's Transport Technology Tracker,[8] a survey with a representative sample of 3,162 people aged 16+ across England, shows that 74% of surveyed people perceived the lack of charging points as a disadvantage of EVs. This was the main disadvantage alongside the cost of purchase. This is referred to as 'charging anxiety' and is particularly relevant to people for whom chargepoints are particularly inaccessible, such as those in rural areas, in shared housing, or in properties without off-street parking. Furthermore, some HAs are reluctant to provide Section 50 licences to EV CPOs under the current regulatory environment, meaning large parts of the country are deprived of adequate provision of chargepoints.

36. The current provision of chargepoints has led to London having more than twice the number of chargepoints per person compared to the rest of the UK, as shown in Figure 1 below. Additionally, people in higher socio-economic groups are more likely to have access to EV chargepoints, especially if they have off-street parking and are able to install private chargepoints. This represents the **absence of equity in geographic and socio-economic terms.** Government intervention is required to reduce these disparities

[8] Technology Tracker: Wave 9, Report prepared for the Department for Transport (Ipsos report (publishing.service.gov.uk)), November 2022 (January 2025)

between regions and socio-economic groups, by ensuring charging infrastructure can be introduced to the entire country under a standardised system.

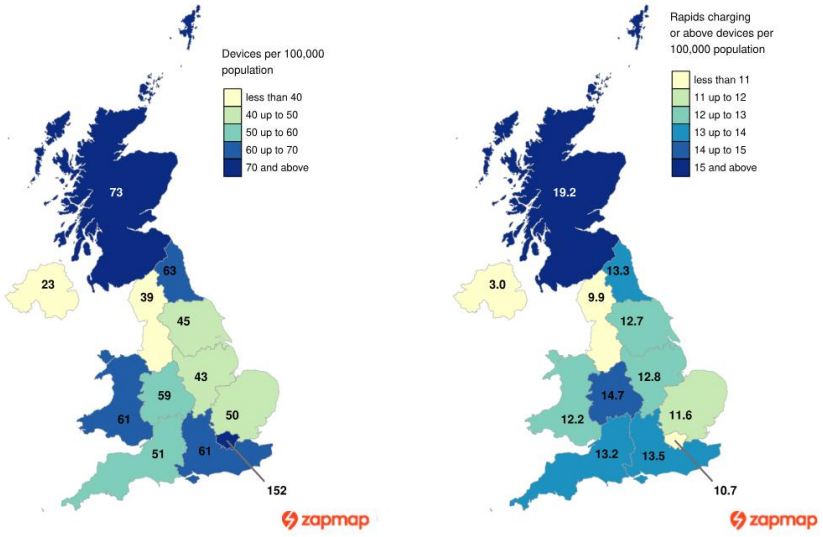

Figure 1 Total (left) and rapid or above (right) public charging devices per 100,000 of population by UK region, July 2023. [9]

37. Market-driven chargepoint provision has resulted in **coordination failure**. Relatively low demand for EVs has led to a low supply of chargepoints, but the low supply of chargepoints may be stifling demand for EVs, as some areas of the country may have inadequate facilities for EV charging which discourages potential buyers. Neither EV consumers nor EV chargepoint suppliers may be willing to move from their current position for fear that it may not be reciprocated.

38. This complex interdependence between demand for EVs and supply of EV chargepoints and the subsequent reduced demand for each good through coordination failure means there could be a more optimal equilibrium in both markets if the Government intervened and helped to facilitate chargepoint installations.

39. One of the main incentives behind increasing the uptake of EVs is the reduction in greenhouse gas emissions from mode shift away from non-electric motor vehicles. These emissions can be considered as a negative externality as the social cost of emissions arises from the private consumption of road transport. These social costs are not considered in a driver's decision-making process, meaning that the uptake of polluting vehicles is higher than the social-optimum, and subsequently the uptake of EVs (and thus EV chargepoints) is below the optimal level for society. By facilitating the increased uptake of EVs, we will move closer to the socially optimal outcome.

[9] Electric vehicle charging device statistics: July 2023 - GOV.UK (www.gov.uk) (January 2025)

40. However, the reduction in negative externalities generated by increased EV uptake relies on the source of the electricity that powers EVs. Since 2000, the country's reliance on fossil fuels to generate electricity has fallen significantly, while renewables now match the level of fossil fuels and are projected to overtake in the next decade.[10]

41. Since the current approval process for installing EV chargepoints is based on regulations previously introduced by the Government, there is a Government failure that has led to various market failures. As such, the Government is required to intervene and resolve the various failures identified through modifying regulations. *Street Manager* and permits for street works are a pre-existing and effective method for applying to undertake street works, but only the Government can allow EV CPOs to use these methods as the system is maintained by the Government. As such, these failures could not be resolved without Government intervention.

Policy objective

42. The Government is committed to supporting the transition to electric vehicles and plans to accelerate the rollout of EV charging infrastructure. This policy supports EV uptake and ensures that everyone has access to reliable and convenient public charging, by making it quicker, easier, and cheaper to install EV infrastructure, helping to deliver a more comprehensive and reliable network of chargepoints around England.

43. **Specific:** The key objective of the intervention will be to standardise the EV chargepoint application process and reduce costs. Our preferred option is to grant EV CPOs the right to carry out street works using permits. The permit scheme sets out fees and timescales in statutory guidance and ensures consistency across HAs. It will provide HAs with a better oversight of planned works in the area with one online source of all permit applications. This will allow better coordination of street works and reduce disruption for networks, businesses, and the public. The cost savings for EV CPOs during the application process may enable more small businesses to enter the market and could also encourage more innovation.

44. **Measurable:** We can measure the impact of the intervention through the number of applications submitted and approved through data from the DfT's *Street Manager* following the implementation of changes. We can then review this against EV chargepoint installation data from previous periods to measure the rate of growth of the charging network. *Street Manager* ensures consistent application of the legal requirements, so applicants provide the same information across England. DfT streams open data on when the works are planned/taking place and charges SUs and HAs for using the digital service. Organisations are put into bands based on the number of works they carry out or are carried out in their area. Those carrying out street works under a permit (and a section 50 licence) also must comply with other legal requirements around safety, reinstatement of the road following the works, which must be guaranteed for two or three years, paying for a sample of their reinstatements to be inspected (£50 per inspection) and submitting start

[10] Institute for Government, Electricity Market statistics: September 2022: https://www.instituteforgovernment.org.uk/article/explainer/electricity-market#:~:text=The%20UK%20uses%20a%20mix,nuclear%20energy%20and%20renewable%20energy. (January 2025)

and stop notices to confirm when works have started/finished. *Street Manager* is also used for these services. All those carrying out works who want to apply for a permit will need to do so through *Street Manager*. This allows us to monitor new entrants to the market and identify whether lower costs could have attracted new entrants into the market. We review Street Manager data quarterly as well as annually. We would expect to more formally monitor the impacts of this policy within five years from its implementation.

45. **Achievable:** Those with a statutory right to carry out street works must apply for a permit from *Street Manager* –DfT's existing digital service for planning and managing works. This intervention would mean that no further development will be needed to enable EV CPOs to apply for permits via the service.

46. **Realistic:** The government continues to support the rollout of EV chargepoint infrastructure and is committed to speed up the approval process for EV chargepoint installation. It is anticipated that the demand for electric vehicles will continue to increase, as will the demand for EV chargepoints. As such there is a need to accelerate the roll out of this necessary infrastructure. Following the initial consultation on the proposal for our preferred option, the majority of those that responded supported the proposed changes and agreed that this would make the application process to install EV chargepoints quicker and less costly.

47. **Time bound:** We will publish the government response to our initial 'Street works access: electric vehicle chargepoint operators' consultation that concluded on 12th April 2024 and implement this measure as primary legislation in the Planning and Infrastructure Bill ('the Bill'). Familiarisation costs are only expected to be experienced in the initial year of the policy's implementation, the benefits of this policy are expected to be fully realised in every year of the appraisal period. It is expected that the impacts of the policy will be monitored and evaluated within five years of the policy's implementation to determine whether the policy has been successful in achieving its objectives.

48. Indicators of success are discussed in more detail in the Monitoring and Evaluation section, but broadly we will use data from DfT's *Street Manager* and engage stakeholders to understand whether policy objectives have been achieved within five years from its implementation. *Street Manager* data will be evaluated to determine whether the number of applications for installing EV chargepoints has increased following the policy's implementation, meanwhile engagement with EV CPOs will help identify whether the policy was successful in simplifying the application process for installing EV chargepoints.

Critical Success Factors (CSFs):

49. His Majesty's Treasury (HMT) Green Book has been used to identify a series of CSFs determining the success of the measure. These have been used to narrow down our longlist of policy options to our shortlist. The section on 'descriptions of options considered' details how the Option Framework-Filter and CSFs were used to reach our shortlist of options.

50. **Strategic fit and meets business needs:** It is imperative that the policy meets the business needs of EV CPOs by minimising their operating costs. Achieving this would

enable EV CPOs to maximise the number of installations in EV chargepoints across the country, and thus achieve the policy's objective of growing the EV charging network. Moreover, it is important that the policy option provides a holistic fit with other government objectives, particularly that of increasing the uptake of EVs.

51. **Potential Value for Money:** A crucial determinant of the policy's success is its ability to maximise social welfare through minimising costs and maximising benefits for EV CPOs. This will ensure that the growth in EV chargepoint infrastructure is maximised, which will facilitate the realisation of benefits associated with the transition to EVs.

52. **Supplier capacity and capability:** For any policy option involving a regulatory change, it is crucial that EV CPOs can fully adhere to changes made in the statutory legislation. Changes in legislation that significantly increase their operating costs or fail to minimise them would fail to meet their business needs, thereby inhibiting their ability to install EV chargepoint infrastructure.

53. **Potential affordability:** A successful policy option must ensure that EV CPOs do not face any unaffordable costs because of its implementation. Although all options considered are regulatory in nature, some of these involve EV CPOs paying an annual fee to use *Street Manager*. However, the charging structure of *Street Manager* is divided into charging bands that are proportional to the number of works undertaken by the organisation in question. In other words, smaller firms conducting fewer works will pay lower fees, and so it is unlikely that any policy option requiring EV CPOs to acquire *Street Manager* will introduce any unaffordable costs.

54. **Potential achievability:** A successful policy option would be achievable through amending the legislation in a manner that EV CPOs can adhere to it, and realistically reduce their costs as a result. This will help ensure that the objective of increasing the installation of EV chargepoints is achieved.

Description of options considered

Longlist:

Do-nothing/Status Quo option:

55. This option would mean there is no change to street works access for EV CPOs, and published guidance will continue to be used to support section 50 licences. The do-nothing option also includes an already planned update to the Specification for the Reinstatement of Openings in Highways (SROH) in relation to cross pavement solutions which are used to connect households without driveways with chargepoints. This would provide some confidence to HAs when reviewing applications from EV CPOs, be it through section 50 licences or *Street Manager*. It should be noted that Ministry of Housing, Communities & Local Government (MHCLG) changes, with respect to allowing some types of chargepoints to be installed under permitted development rights, also form part of the 'do-nothing' option. There are no additional costs or benefits of this option.

A non-regulatory option:

56. The guidance on issuing section 50 street works licences was published in February 2024. This guidance aims to improve consistency and address some of the issues with the time and costs associated with applying for a licence. It now explicitly states that EV chargepoint installers do not need to apply for permission under section 115E of the Highways Act 1980 in addition to a section 50 licence. However, EV CPOs report that this issue is still ongoing, as are the inconsistencies between each HA's application process. Further updates to this guidance are unlikely to achieve our policy objectives to make the EV chargepoint installation process more efficient.

57. This is because the guidance is advisory and non-statutory, meaning Local Authorities can deviate from it. HAs often demand extensive amounts of information to support EV chargepoint installation applications and some HAs are requesting bonds before a section 50 licence is granted. Following the consultation for our proposal, the key theme in the responses we received from HAs was the need to retain oversight of EV chargepoint installation in their area. We assume the licence application process will remain inconsistent between HAs without change to regulatory and statutory intervention - without this, they would continue to use their discretion on whether to follow the guidance.

58. HAs are already given the option to use *Street Manager* to register section 50 licences to enable them to better plan and coordinate works in their area. However, this is also non-statutory and voluntary and many do not use this function. Without making this a statutory requirement through changes to regulation, the benefits associated with having all applications on one central system will not be realised.

A do-minimum option:

59. This option would grant EV CPOs the right to carry out street works using permits rather than a licence. This option could see time savings achieved as EV CPOs would apply for a permit rather than a section 50 licence, so HAs would need to comply with the timescales set out in the statutory guidance. Whilst maximum permit application fees are also set out in the guidance, this option may not fully realise the cost and time savings.

60. If HAs continue to choose to not follow the non-statutory guidance and EV CPOs are still at times required to get permission under section 115E of the Highways Act 1980, costs and time savings per application may remain higher than they could be. Therefore, without changes to statutory regulation, the cost and time savings of the do-minimum option may not be fully realised.

A preferred option:

61. EV CPOs will be given access to permits when installing EV charging infrastructure, leading to potential time savings as EV CPOs would apply for permits instead of section 50 licences, meaning HAs would need to comply with timescales established in statutory guidance.

62. Additionally, the Highways Act 1980 will be amended to prevent HAs from granting permission under section 115E for EV chargepoint installation where this is capable of being authorised by a permit, therefore maximising the time and cost savings EV CPOs face compared to the do-minimum option.

63. The power afforded to HAs to grant permission for street works under section 115E of the Highways Act 1980 needs to be limited such that it can no longer be exercised in relation to EV CPOs installing EV chargepoints. DfT's view is that 115E permission is not necessary if the organisation installing the chargepoint has either a pre-existing statutory right to carry out street works or a section 50 licence.

64. EV CPOs will also be given access to *Street Manager*, the DfT's online service for planning and managing works. Once the legislation has been amended, EV CPOs will need to apply for a Street Works Act (SWA) code from Geoplace in order to be able to access *Street Manager*. Once this is obtained, they can then ask to be onboarded to the service. DfT recharges the cost of *Street Manager* to organisations who use it, based on a sliding scale according to the number of works carried out. The cost is annual and is per organisation. It covers as many users as the organisation wants to add and covers every HA in England.

65. To address concerns raised by HAs, this change will be supported by a framework to ensure EV CPOs are verified as having the necessary authority to install EV chargepoint infrastructure before they can be granted a SWA code, which would enable them to access permits and *Street Manager*. The Office for Zero Emission Vehicles (OZEV) will provide further information around this verification process in due course, and before the Bill power is commenced.

66. HAs have raised concerns around ongoing maintenance of chargepoint apparatus and quality of reinstatements. Under both the permitting and section 50 licencing regimes, the organisation carrying out street works must comply with requirements set out in NRSWA. These include a requirement for the undertaker to ensure their apparatus is kept in efficient working condition and gives the HA power to carry out inspections for a fee, on works being carried out and reinstatements. We will ensure, when amending legislation, that the same NRSWA requirements are applied to EV CPOs so that none of the existing safeguards are lost.

67. EV CPOs are also held accountable for the reliability of their chargepoint network in the Public Charge Regulations 2023. These regulations require the EV CPO to provide a staffed telephone helpline 24 hours a day, ensuring the number is displayed in a prominent position on or near the chargepoint to support customers and report issues. They are also required to provide an annual report to the Secretary of State detailing the reliability of their network.

68. EV CPOs should ensure that they engage early with HAs before EV chargepoints are installed. EV CPOs should refer to the OZEV Guide to Electric Vehicle Charging infrastructure for HAs when this has been published. The guidance promotes early engagement with all stakeholders to ensure EV chargepoint installation meets the needs of local communities.

Shortlist appraisal:

69. HMT's Green Book Options Framework-Filter was used to narrow the longlist down to the following shortlist: do-nothing and preferred option which were consulted on during the consultation stage. A wide range of proposed options were considered in the longlist, including non-regulatory instruments. Assessment of these measures was undertaken through consideration of how closely they each met the SMART objectives and CSFs, enabling the development of justification for the statutory regulatory change in our preferred option. Careful consideration of the value of the monetised costs and benefits, the financial cost to the public sector, and non-monetised costs and benefits was also used to draw the shortlist from the longlist.

70. The **do-nothing option** was taken forward for comparison purposes, however, it fails to meet the policy objectives and CSFs. Continuing to rely on more costly and time-consuming section 50 applications means that EV CPOs will not benefit from any cost and time savings associated with the cheaper and quicker permit regime, and so does not meet the business needs of EV CPOs. Furthermore, previous reports from EV CPOs suggest that the non-statutory guidance for HAs on issuing section 50 licences has failed to standardise application procedures and thus reduce their costs, further dampening the rollout of EV chargepoint infrastructure. This is because many HAs continue to not follow the guidance, but instead follow their own unique application procedures, suggesting that changes to statutory regulation are needed for cost and time saving benefits to be fully realised. Moreover, by not granting EV CPOs access to *Street Manager*, HAs will continue to hold limited oversight over planned works across their street networks, and therefore the benefits associated with better coordination of street works, such as reduced disruptions on road networks, would not be realised.

71. The **non-regulatory option** was not taken forward because it fails to meet all the objectives and CSFs. Relying on non-statutory guidance to streamline the application process for installing EV chargepoints has not proved effective, as HAs can and continue to deviate from it and impose their own unique extensive requirements on EV CPOs. For instance, despite updates to non-statutory guidance specifying that EV CPOs need not apply for permission under section 115E of the Highways Act 1980 in addition to a section 50 licence or permit, this issue continues to persist. As such, inconsistencies in the application processes for EV CPOs have continued, and applications for installing EV chargepoint infrastructure have remained costly and time-consuming. Additionally, while HAs have the option to use *Street Manager* in registering section 50 applications, this is also under non-statutory guidance and completely voluntary, resulting in many not using this function. Therefore, we assume the benefits of better coordinated street works are unlikely to be realised without any changes to statutory regulation. Considering these issues, a non-regulatory approach reliant on updating non-statutory guidance would likely be counterintuitive in achieving our policy objectives.

72. The **do-minimum option** was also not taken forward because it only meets our policy objectives and CSFs to a limited extent. While it does meet objectives of lowering application times and costs through granting EV CPOs the right to carry out street works using permits, and results in better coordination of street works by HAs through storing all permit applications centrally on *Street Manager*, inconsistencies between HAs and their

application processes may continue to persist. This is because, much like the non-regulatory option, the do-minimum option does not include any changes to statutory legislation preventing HAs from demanding permission under section 115E of the Highways Act 1980 if EV CPOs already have a permit to install EV chargepoints. As such, under this option, the full cost and time savings associated with the permit regime may not be fully realised, and so social value would not be maximised.

73. The **preferred option** was taken forward to the shortlist appraisal, because it was the only option that met all the objectives and CSFs. It reduces the cost and time spent on applications intending to install EV chargepoints through granting EV CPOs the right to carry out street works using permits, which are cheaper and faster to apply for than section 50 licences. The permit regime also sets out fees and timescales in statutory guidance, ensuring greater consistency across all HAs. Granting EV CPOs access to *Street Manager* also means that all works concerning EV chargepoints will be stored on one central online source, allowing HAs to better coordinate works on their roads and thus reduce disruptions. Furthermore, changing legislation to prevent HAs from requiring permission under section 115E in addition to a permit would further standardise the application process across all HAs, resulting in maximised cost and time savings for EV CPOs. While the do-minimum option achieves our objectives to an extent, it is only through both changes in legislation that all potential cost and time savings associated with the policy will be fully realised, meaning social value would not be maximised.

Summary and preferred option with description of implementation plan

74. Between 5th February 2024 to 12th April 2024, the previous Government carried out a consultation on a proposal that, instead of applying for section 50 licences, EV CPOs should be brought into the street works permitting regime and given access to permits when installing EV charging infrastructure.

75. The use of permits would accelerate the delivery of EV chargepoint roll out across the UK to meet the increasing demand and contribute to a greener future. The proposal will reduce administration time for HAs processing section 50 licence applications, reducing the lead time between the EV CPO submitting their application and them receiving a decision. A standardised process, with a standard fee across HAs would enable faster and more cost-efficient installation of EV chargepoints. The implementation of this intervention could lead to increased innovation and investment in the EV chargepoint market due to the reduced costs associated with instalment.

76. In terms of verification of EV CPOs, we are working with the Office for Zero Emission Vehicles who will provide further information around this verification process in due course, and before the Bill measure is commenced.

77. How the intervention will lead to the achievement of the identified policy objectives is outlined in the Theory of Change for the preferred option in Figure 2 below:

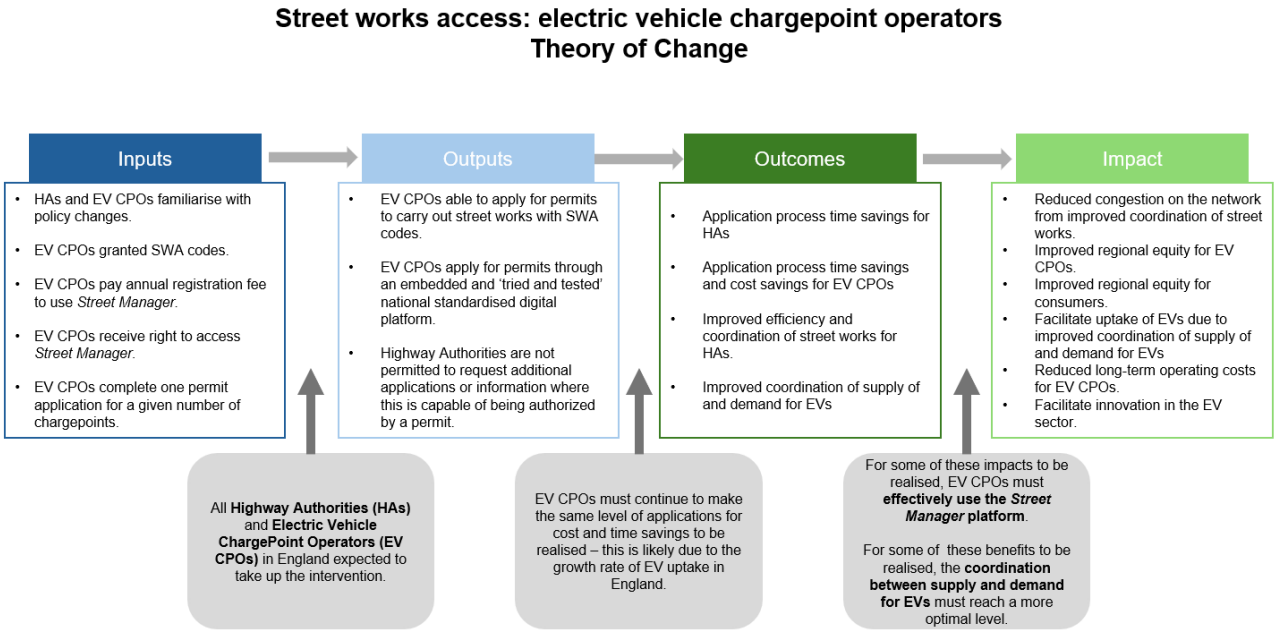

Figure 2 Theory of Change for the preferred option

NPSV: monetised and non-monetised costs and benefits of each shortlist option (including administrative burden)

78. Using a discount rate of 3.5% per year, in line with the HMT Green Book guidance, gives a discounted Net Present Social Value (NPSV) of £7.85 million for the preferred option across the 10-year appraisal period. The preferred option of this policy (option 1) has an Equivalent Annual Net Direct Costs to Business (EANDCB) of approximately £0.84 million in 2025 prices and 2026 present value. This measure satisfies the de minimis threshold of EANDCB not exceeding +/- £10m. However, given this measure will be implemented under primary legislation, the new Better Regulation Framework (BRF) requires an impact assessment to be completed rather than a de minimis assessment (DMA). Given that impacts of this measure on business are relatively small, proportionate analysis has been conducted. Table 1.1 below shows the total net discounted costs, benefits, NPSV and EANDCB for the preferred option:

Table 1.1: Low, central and high EV growth scenario summary measures

Summary Measure	Low	Central	High
Costs (millions)	£0.37	£0.44	£0.51
Benefits (millions)	£5.67	£8.29	£15.74
Net Present Social Value (millions)	£5.30	£7.85	£15.23
EANDCB (millions)	-£0.56	-£0.84	-£1.63

Summary

Monetised Costs

- Familiarisation Costs for HAs (direct)
- Familiarisation Costs for EV CPOs (direct)
- Street Manager annual registration fees for EV CPOs (direct)

Unmonetised Costs

- Societal impact of an increase in the number of works associated with installing EV chargepoints (indirect)
- Coordination of Street Works Act (SWA) Codes (direct)

Monetised Benefits

- Application process time savings for HAs (direct)
- Application process time savings for EV CPOs (direct)
- Application process cost savings for EV CPOs (direct)

Unmonetised Benefits

- Improved efficiency and coordination of street works for HAs (indirect)
- Increased Fixed Penalty Notices and charges avoided for EV CPOs (indirect)
- Improved regional equity for EV CPOs (indirect)
- Improved regional equity for consumers (indirect)
- Increased EV usage and associated benefits (indirect)
- Facilitation of the EV market and future innovation (indirect)

Monetised Impacts

79. Throughout the analysis of monetised costs and benefits, we present impacts as a range of scenarios based on different EV chargepoint growth rates from 2021-2024 using data from ZapMaps[11] on the size, composition, and growth of the EV chargepoints market. The growth rate of EV chargepoints has increased every year from 2021 to 2024 and can be seen in Table 2. The higher the growth in EV chargepoints, the larger the cost and time saving benefits from switching from option 0 to option 1.

Table 1.2 Total number and growth of EV chargepoints since 2020

Year	Total Number of UK EV Chargepoints	Annual growth in UK EV Chargepoints	% annual growth in UK EV Chargepoints
2020	20,964	-	-
2021	28,460	7,496	36%
2022	37,263	8,803	31%
2023	53,865	16,602	45%
2024 (up to June)	62,536	8,671	16% (incomplete year)

[11] EV charging statistics 2024 - Zapmap (zap-map.com)

80. As this policy change only applies to EV CPOs applying to install EV CPs in England, we use data from ZapMaps to estimate that around 86% of chargepoints are in England.

81. For the low growth scenario, we use the lowest year of growth over the 4-year period - 2021 - published by ZapMaps. For the central growth scenario, we use an average of the last three years of complete data (2021 to 2023) on EV chargepoint growth. Finally, for the high growth scenario, we use anticipated growth for 2024 in chargepoints based on January to June 2024 data. For all three scenarios we only use central estimates for other input variables. The number of EV CPs installed a year in England in each scenario can be seen below.

Table 1.3 Number of EV CPs installed a year in England by growth scenario

	Low Growth Scenario	Central Growth Scenario	High Growth Scenario
Number of EV CPs installed a year	6,460	9,451	17,934

82. Sensitivity testing on assumptions is undertaken using the central growth scenario and can be found in 'Risks and Assumptions'. Impacts are in 2025 prices and 2026 present value terms unless stated otherwise.

Costs

Transition Costs

83. Amending the requirements to allow EV CPOs to access *Street Manager* to apply for permits would require staff at HAs and EV CPOs to familiarise themselves with the new requirements.

84. For the 159 HAs in England,[12] this would involve an average of four staff per authority needing to familiarise themselves with the new requirements. The estimated familiarisation time is one hour. The estimated hourly wage of HA staff is £14.15,[13] with a non-wage uplift of 1.30. We therefore estimate that the cost of familiarisation for HAs in the first year of the appraisal would be £12,017.

85. There will also be familiarisation and training costs for EV CPOs. To calculate the cost of familiarising with the new guidance we assume that there are 32 EV CPOs[14] with an average of around three staff per operator requiring familiarisation. The estimated familiarisation time is one hour. The estimated hourly wage of EV CPO staff is £18.87,[15] with a non-wage uplift of 1.30. We therefore estimate that the total cost of familiarisation

[12] Street Manager, 2024

[13] Office for National Statistics, Annual Survey of Hours and Earnings (ASHE), 2023 Revised Edition, Table 14.5a, 'Local government administrative occupations (4112)', All Median Wages (ons.gov.uk) (January 2025)

[14] This represents a best estimate and is based on data from ZapMaps which covers 75% of the UK chargepoint market (EV charging statistics 2024 - Zapmap (zap-map.com). There may be more EV CPOs but we are unable to access full Zap Map data due to commercial sensitivity. (January 2025)

[15] Office for National Statistics, Annual Survey of Hours and Earnings (ASHE), 2023 Revised Edition, Table 14.5a, 'Managers and proprietors in other services (125)', All Median Wages (ons.gov.uk) (January 2025)

across all EV CPOs in the first year of the appraisal would be £2,621. To calculate the cost of *Street Manager* training we assume again that there are 32 EV CPOs with an average of around three staff per operator requiring training. The estimated training time is 6 hours, and the estimated hourly wage of staff is £18.87, with a non-wage uplift of 1.30. We estimate that training provided by an external supplier will cost £350 per individual.[16] Based on these assumptions, the total cost of training across all EV CPOs in the first year of the appraisal would be £53,114. We therefore estimate the total cost of familiarisation and training for EV CPOs to be £55,734.

86. The fees HAs can charge for dealing with permit applications are expected to cover their costs.

On-going Costs

87. If EV CPOs are given permitting rights and are allowed to access *Street Manager*, they will face an annual *Street Manager* registration fee payable to DfT to use the *Street Manager* platform. This fee will depend on how many applications each EV CPO makes in a given year, operating on a scale shown below.

Band	Number of works	Annual Fee
A	300,001+	£400,000
B	175,001-300,000	£200,000
C	125,001-175,000	£150,000
D	85,001-125,000	£100,000
E	70,001-85,000	£75,000
F	50,001-70,000	£60,000
G	35,001-50,000	£40,000
H	25,001-35,000	£32,500
I	15,001-25,000	£25,000
J	7,501-15,000	£17,500
K	3,001-7,500	£10,000
L	1,501-3,000	£7,500
M	751-1,500	£5,000
N	151-750	£3,000
O	0-150	£1,000

Table 4 Bands for Annual Registration Fee for Street Manager 2023/24, as set by DfT

[16] Introduction to Street Works | JAG(UK) (jaguk.org) (January 2025)

88. Publicly available ZapMaps data on market share in the EV sector shows that the top five networks operate around 40% of all chargepoints in the UK[17], so it is highly unlikely that all EV CPOs will make the same number of applications and attract the same fees.

89. Using this data on the market share and assumptions on the number of *Street Manager* applications required under the policy change (discussed in more detail in 'benefits' section), we estimate that five networks fall into band N attracting charges of £3,000 a year, and the remaining 27 networks fall into band O and face the lowest charge of £1,000. We estimate annual charges costing businesses £43,142**.** Discounting these costs by 3.5% over the 10-year appraisal period as per HMT Green Book guidance, [18] we estimate *Street Manager* registration fees to cost EV CPOs around £0.37 million. Using our low and high scenarios for EV growth, we estimate a range of costs to EV CPOs between £34,925 and £51,360 a year due to the number of EV CPs being installed and so the number of applications required in each scenario. Over the 10-year appraisal period we estimate a range of costs between £0.30 million and £0.44 million.

Benefits

Application time savings for HAs:

90. We expect there to be application process time savings for HAs, as all applications from EV CPOs will now be processed through a centralised system, rather than the need to manually process section 50 applications.

91. Using ZapMaps data[19] on the number and growth of EV chargepoints in England and consultation responses on the number of EV chargepoints covered by one section 50 licence, we assume that HAs process 1,350 section 50 licences a year, with each of the 159 HAs processing around eight applications a year absent intervention. Section 50 licences can cover a larger number of chargepoints than permits so we assume that one section 50 application would now require two permit applications; this is an unevidenced assumption which relies on a best, but sensible, estimate – sensitivity to this assumption can be found in 'Risks and Assumptions'. This means under the policy change, HAs will now need to process 2,700 *Street Manager* permit applications in total a year, or around 17 applications a year each. Evidence collected in the consultation and contextual information suggests that it takes HAs around 7 hours to process a section 50 application, and around 2 hours to process a *Street Manager* application. This means that, following the policy change, HAs will save around five hours per *Street Manager* application. The estimated hourly wage of HA staff is £14.15, [20] with a non-wage uplift of 1.30.

92. We estimate that time savings made under the policy change will be around £0.08 million a year for HAs. Discounting over the 10-year appraisal period, we estimate that HAs will

[17] EV charging statistics 2024 - Zapmap (zap-map.com) (January 2025)

[18] The Green Book (publishing.service.gov.uk) (January 2025)

[19] EV charging statistics 2024 - Zapmap (zap-map.com) (January 2025)

[20] Office for National Statistics, Annual Survey of Hours and Earnings (ASHE), 2023 Revised Edition, Table 14.5a, 'Local government administrative occupations (4112)', All Median Wages (ons.gov.uk) (January 2025)

see time saving benefits of around £0.66 million. Using our low and high scenarios for EV growth, we estimate a range of time savings benefits to HAs between £0.05 million and £0.15 million. Over the 10-year appraisal period we estimate a range of time savings between £0.45 million and £1.25 million.

Application time savings for EV CPOs

93. The primary benefit of allowing EV CPOs to utilise *Street Manager* instead of requiring them to apply for section 50 licences is that EV CPOs should experience time savings and cost savings relating to the application process.

94. We expect that there will be significant time savings for EV CPOs, as all applications will now be made in a centralised system rather than manual applications being made by operators. As above, we use ZapMaps data[21] to estimate that around 1,350 section 50 licence applications are made by EV CPOs per year absent intervention. Again, in our analysis we assume that one section 50 application would require two permit applications due to the policy change, so under the policy change EV CPOs will need to make 2,700 *Street Manager* permit applications a year. We also estimate that there are 32 EV CPOs operating in England. We assume that applying through *Street Manager* rather than using section 50 licences saves EV CPOs an average of 7.5 hours per application. The estimated hourly wage of EV CPO staff is £18.87, [22] with a non-wage uplift of 1.30.

95. We estimate that annual time savings made under the policy change for EV CPOs will be around £0.15 million and, over the 10-year appraisal period, we estimate that EV CPOs will see time saving benefits of around £1.32 million. Using our low and high scenarios for EV growth, we estimate a range of annual time savings benefits to EV CPOs between £0.10 million and £0.29 million. Over the 10-year appraisal period we estimate a range of time savings between £0.90 million and £2.50 million.

Cost savings on application fees for EV CPOs

96. We also expect that there will be significant cost savings for EV CPOs, as maximum *Street Manager* application fees are significantly lower than reported section 50 licence application fees.

97. We use the same ZapMaps data and assumptions on anticipated number of section 50 licences and *Street Manager* permit applications required as above. Stakeholder engagement shows that section 50 application fees can range from anywhere from below £250 to over £1,250. Using evidence from a consultation with HAs and EV CPOs, we assume an average section 50 per application cost of £659. Applications on *Street Manager* also command a fee dependent on the type of road and scale of work. These are capped at different levels for each type/scale of work, we expect that the types of

[21] EV charging statistics 2024 - Zapmap (zap-map.com) (January 2025)

[22] Office for National Statistics, Annual Survey of Hours and Earnings (ASHE), 2023 Revised Edition, Table 14.5a, 'Managers and proprietors in other services (125)', All Median Wages (ons.gov.uk) (January 2025)

works EV CPOs will undertake will attract application fees between £45 and £130, with an average fee of £65[23].

98. Using the same assumptions as for time savings and the above on application costs, we anticipate that EV CPOs will save around £0.73 million on applications per year when applying for permits through *Street Manager* rather than section 50 licences. Discounting savings over the 10-year appraisal period, we anticipate EV CPOs may see application cost savings of around £6.32 million. Using our low and high scenarios for EV growth, we estimate a range of cost savings benefits to EV CPOs between £0.50 million and £1.39 million. Over the 10-year appraisal period we estimate a range of cost savings between £4.32 million and £11.99 million.

Unmonetised Impacts

Unmonetised Costs

99. Allowing EV CPOs to access *Street Manager* will see an increase in the number of street works on a national scale as EV CPOs will be able to install infrastructure more easily and readily. Although this will bring numerous benefits, there could be societal costs related to this increase.

100. Increased street works may create increased disruption on the road network, along with inconvenience costs of installing EV CPs. This may be caused by increased congestion, which has impacts on journey times, fuel and non-fuel vehicle operating costs, accidents, and emissions, in the area that street works are being carried out in. This impact is unmonetised due to the limited evidence on the increase in street works this policy will cause; however, an evaluation of permit schemes by DfT in 2016 suggested the total cost of congestion from street works per year is around £2.10billion (2025 prices) and the cost of congestion per work per day is around £285 (2025 prices).[24]

101. It is important to note, however, that the increased disruption on the road network resulting from an increase in EV chargepoint installations is likely to occur in the short run only. We expect that the number of EV chargepoint installations will increase in the long run regardless of whether this measure is introduced. However, we expect that this measure will incentivise EV CPOs to install chargepoint infrastructure sooner and thus accelerate the rate at which EV chargepoints are installed in the short run, before it stabilises in the long run. Chargepoints are also installed in footways/pavements, which should also reduce impacts on traffic using carriageways.

102. Should this policy change be introduced, DfT will need to develop a framework to ensure EV CPOs are verified before they are granted Street Works Act (SWA) codes. SWA codes are required to access permits and *Street Manager.* OZEV will **coordinate this activity and there is likely to be cost incurred**, though this has not been monetised as the details of this role is still to be agreed upon and will not impact on businesses.

[23] Permit schemes: statutory guidance for highway authorities (publishing.service.gov.uk)

[24] Evaluation of street works permit schemes (publishing.service.gov.uk)

Unmonetised Benefits

103. It is anticipated that the transition to *Street Manager* will allow improved efficiency and coordination of street works planning for HAs in their local area as they will have a standard, centralised view of street works applications across different works promoters. The risk of some applications being overlooked would also be significantly reduced. HAs better coordinating the timings of works across the network will also help to reduce the impacts of congestion, which will see benefits for all road users including time savings, improved safety, and cost savings through reduced fuel consumption. This impact is unmonetised as there is little evidence on congestion caused by poorly coordinated street works on the road network; however as referenced above, an evaluation of permit schemes by DfT in 2016 suggested the total cost of congestion from street works per year is around £2.10billion (2025 prices) and the cost of congestion per work per day is around £285 (2025 prices)[23]. For this impact to be realised, EV CPOs and HAs must both engage effectively with *Street Manager*.

104. The policy change is also likely to make it easier for EV CPOs to comply with street works regulations and avoid Fixed Penalty Notices. Absent intervention, EV CPOs must coordinate and monitor applications and works using their own systems, *Street Manager* offers a centralised and consistent method for managing works and so will likely see EV CPO more able to comply with street works regulations, thus reducing their likelihood of incurring Fixed Penalty Notices or other charges. For this impact to be realised, EV CPOs must engage effectively with *Street Manager*.

105. There are extreme regional differences in application fees and processes for section 50 licences; consultation analysis shows costs per section 50 licence ranging from below £250 to above £1,250, and in some areas, EV CPOs are unable to apply for licences at all. Standardising costs and processes around EV CPOs should improve regional equity for EV CPOs. This would allow for EV CPOs to better coordinate their business activity across the UK, likely reducing operating costs, and allow access to new markets, which could improve profitability.

106. This policy change is expected to also improve regional equity for consumers as the faster rollout of EV CPs across all regions in the country would create a level playing field relating to the purchase and use of EVs. Some areas of the country have very limited EV charging capabilities, which may dissuade prospective buyers from purchasing an EV. The improved regional equity for EV CPOs as outlined above could mean that more consumers across the UK will have access to EV CPs.

107. Furthermore, there are secondary benefits of this policy change in the uptake of EV usage and associated benefits. Lower competition in the market for EV CPOs and higher application costs may mean that, if costs are passed on, consumers are faced with higher prices to use EV chargepoints in the current situation. If costs are not passed on, the supply of EV CPs may not match demand, contributing to the *coordination failure* identified

in the rationale for intervention. Allowing EV CPOs to use *Street Manager*, which would reduce application and operating costs and increase market competition, would allow consumers to benefit from lower prices, both in terms of charging and installing EV CPs. This, in turn, could increase uptake of EVs as prices, often cited as a barrier to purchasing EVs,[25] would fall. Additionally, the ability to charge EVs would become easier with the increased rollout of EV CPs, as we would expect to see more EV CPs per capita. The often cited 'charging anxiety' would be reduced among the population, resulting in a likely increase in uptake of EVs. This policy will facilitate the effective transition to EVs in this way. The indirect benefits of this policy are the direct benefits of increasing EV uptake, including:

- Reduction in greenhouse gas emissions
- Improved air quality
- Reduced noise pollution
- Lower waiting times for consumers at chargepoints
- Jobs and economic activity associated with EVs and EV CPs

108. The proposed policy change and its primary impacts will also lead to the facilitation of EV market development and future innovation in the EV CP market and the wider EV market in general, as companies in the sector will have greater certainty and should experience an increase in income through the knock-on effects of the aforementioned impacts. As a result of the greater certainty and with increased income, companies may be more willing to invest in research and development to further improve EV technology.

109. We have not monetised any impacts around the amendment to prevent HAs from requesting applications under Section 115E when installing EV CPs due to a lack of quantifiable evidence surrounding the impacts of this change. However, we anticipate this to be a benefit for EV CPs in the form of further improved efficiency, reduced application costs and time savings.

Costs and benefits to business calculations

110. We anticipate that the overall impact of this policy change on businesses will be positive, the objective of this policy is to make the process of applying to undertake street works for EV CPOs easier, faster, and less costly. Using a discount rate of 3.5% per year, in line with HMT Green Book guidance, gives a discounted Net Present Business Value of £7.21 million for the preferred option across the 10-year appraisal period. The preferred option of this policy has an EANDCB of approximately -£0.84 million in 2025 prices and 2026 present value. The below table demonstrates costs, benefits and the EANDCB of the proposal:

[25] Technology Tracker: Wave 9, Report prepared for the Department for Transport (Ipsos report (publishing.£13.94service.gov.uk)), November 2022

Table 1.5 Low, central and high EV growth scenario business summary measures

Summary Measure	Low	Central	High
Costs to Business PV (millions)	£0.36	£0.43	£0.51
Benefits to Business PV (millions)	£5.22	£7.63	£14.49
Net Present Business Value (millions)	£4.86	£7.21	£13.99
EANDCB (millions)	-£0.56	-£0.84	-£1.63

111. We do not anticipate that there will be any direct pass through to households as, overall, cost savings outweigh new costs of the policy change. We have not included detail on individual impacts in this section, further detail can be found in the Net Present Social Value section. Of the monetised and unmonetised impacts identified in the above section, we anticipate the below will fall on businesses:

Monetised Costs

- Familiarisation Costs for EV CPOs (direct)
- Street Manager annual registration fees for EV CPOs (direct)

Monetised Benefits

- Application process time savings for EV CPOs (direct)
- Application process cost savings for EV CPOs (direct)

Unmonetised Benefits

- Improved ease of complying with street works regulations and avoiding Fixed Penalty Notices and charges for EV CPOs (indirect)
- Improved regional equity for EV CPOs (indirect)
- Facilitation of the EV market and future innovation (indirect)

112. Regarding distributional impacts of the policy change on businesses, there are significant positive regional impacts. Currently, there are extreme regional differences in application fees and processes for section 50 licences; consultation analysis shows costs per section 50 licence ranging from below £250 to above £1,250, and in some areas, EV CPOs are unable to apply for licences at all or must provide costly bonds when making applications. Standardising costs and processes around EV CPOs would **improve regional equity for EV CPOs.** This would allow for EV CPOs to better coordinate their business activity across the UK, likely reducing operating costs, and would allow access to new markets, improving profitability.

Impact on small and micro businesses

113. The preferred way forward will have a positive impact on small and micro businesses (SMBs), and positively impact medium businesses also. This policy is deregulatory in

nature and aims to reduce the burdens faced by businesses regardless of size. There are no exemptions for small, micro, or medium businesses as the burden on these businesses is proportionate and, were SMBs and medium businesses exempted, the policy change would not realise it's expected benefits. Use of *Street Manager* is voluntary; should the policy change increase costs for EV CPOs, businesses reserve the right to use section 50 licences.

114. With the industry still being in its infancy, we anticipate that many EV CPOs are classed as SMBs or medium businesses. There are only 32 EV CPOs in the UK as of 2024. We expect the scope of the SMBs and medium businesses impacted by this measure to be limited to these EV CPOs. Nevertheless, this policy change will make the process fairer for these smaller firms, who currently face more complicated, lengthier, and costlier processes compared to utility companies, who are generally larger businesses.

115. It is likely that this policy change will facilitate further growth for existing SMB and medium-sized EV CPOs operating in the industry and enable other SMBs and medium businesses to enter the industry due to the reduction in costs associated with EV chargepoint installation.

Costs and benefits to households' calculations

116. We do not anticipate that there will be any direct impacts on households as a result of this policy change, but there are indirect impacts of this measure around improved regional equity for consumers and potential reduced costs of EVs which will positively impact households.

117. We anticipate that there will be positive regional impacts on households. The policy change would improve regional equity for consumers as the faster rollout of EV CPs across all regions in the country would create a level playing field relating to the purchase and use of EVs. Some areas of the country have very limited EV charging capabilities, which may dissuade prospective buyers from purchasing an EV. The improved regional equity for EV CPOs as outlined above will mean that more consumers across the UK will have access to EV CPs.

118. There are no direct positive impacts of this policy change on low-income groups, however there is expected to be significant positive second-order impacts on the EV market more generally as we anticipate this policy change will facilitate the uptake of EV vehicles and growth in the EV sector. As such, there may be reduced costs of EV vehicles which is likely to have positive distributional impacts, but we are unable to attribute this to this specific policy change.

Minimising administrative and compliance costs for preferred option

119. The application process for section 50 licences vary greatly between HAs. Some HAs have extensive requirements in terms of information they need to be sent before an application will be approved. As a result, installing EV apparatus under a section 50

licence can be a lengthy process. Granting EV CPOs access to the permitting scheme will mean that the applications are processed more quickly as the time that HAs have to respond is set out in statutory guidance for street works permit schemes.

120. EV CPOs will also be given access to *Street Manager*, DfT's online service for planning and managing works. Once the legislation has been amended, EV CPOs will need to apply for a SWA (Street Works Act code) from Geoplace in order to be able to access *Street Manager*. Once this is obtained, they can then ask to be onboarded to the service. Once EV CPOs have been granted access to the street works permitting regime, they should support employees to access the existing *Street Manager* guidance and tutorial videos on how to use to the platform to provide adequate training to those that need it.

121. This change will be supported by a framework to ensure EV CPOs can be verified by as a registered chargepoint operator. This will ensure, that in the absence of an industry regulator, Geoplace has an appointed body to contact to provide this verification. A charge point operator means the person responsible for operating a public charge point, whether as an owner or third party as defined by the Public Charge Point Regulations 2023. Only once verified would they be granted a SWA code, enabling them to access permits and *Street Manager*. OZEV will provide further information around this verification process in due course.

122. *Street Manager* is constantly evolving to improve functionality and to meet the needs of the industry however no further development of the service is needed to allow EV CPOs to access *Street Manager*.

123. There will be no additional reporting requirements placed on HAs or EV CPOs. DfT will be able to utilise data from Street Manager to monitor EV CPO chargepoint installation and to measure whether the change has achieved the policy objectives.

Business environment

124. The aim of this policy change is to increase the ease of EV CPOs conducting their business. We anticipate that the sector will become for attractive for existing operators, though we are not able to attribute this directly to the policy change as this is likely to be second order. Additionally, we anticipate barriers to entry, particularly in rural areas, will likely be reduced as regional equity is improved for EV CPOs and demand for EVs in these areas will be stimulated.

125. This intervention is likely to have positive impacts on innovation in street works and in the EV market. This policy change aims to decrease costs of installing EV CPs and so more funding should be available in the EV sector to innovate. Additionally, this policy aims to coordinate supply and demand for EVs across the UK, if this is successful the EV sector will grow and, again, more income will be available in the sector to innovate.

126. Finally, there is a risk that by granting EV CPOs permitting rights when carrying out works on the highway, but not creating a regulatory body as is the case for statutory undertakers, we don't provide enough regulatory oversight as we do for statutory

undertakers, who are backed by an Act and regulator. This could result in a lack of regulatory scrutiny of EV CPOs, with the potential for reputational damage if not mitigated. However, this risk exists at present as EV CPOs are not regulated.

127. We are unable to estimate the overall direction of the impact on doing business in the UK, though would mitigate this to an extent by reviewing the policy change and ensuring there have been no unintended consequences of the policy as per the monitoring and evaluation section.

Trade implications

128. There are no direct international trade or investment impacts associated with this policy change. As noted above, this policy change may have positive impacts on innovation in the EV sector and may facilitate the uptake of EVs more generally. Were this the case, the UK EV market may become more attractive to international investment.

Environment: Natural capital impact and decarbonisation

129. This measure supports commitments to improve the environment and decarbonise, though indirect or second-order impacts of the policy change.

130. There are secondary benefits of this policy change around the uptake of EV usage and associated benefits. Absent intervention, lower competition in the market for EV CPOs and higher application costs may mean that, if costs are passed on, consumers are faced with higher prices than optimal in the current situation. If costs are not passed on, the EV CPs will face higher costs than optimal and the supply of EV CPs may not match demand, contributing to the *coordination failure* identified in the rationale for intervention.

131. Allowing EV CPOs to use *Street Manager*, which would reduce application and operating costs and increase market competition, would allow operators and consumers to benefit from lower prices, both in terms of charging and installing EV CPs. This, in turn, could increase uptake of EVs as prices, often cited as a barrier to purchasing EVs,[26] would fall. Additionally, the ability to charge EVs would become easier with the increased rollout of EV CPs, as we would expect to see more EV CPs per capita. The often cited 'charging anxiety' would be reduced among the population, resulting in a likely increase in uptake of EVs. This policy will facilitate the effective transition to EVs in this way. The indirect benefits of this policy are the direct benefits of increasing EV uptake which include reduced greenhouse gas emissions, improved air quality and reduced noise pollution.

Other wider impacts (consider the impacts of your proposals)

132. Full and appropriate regard has been paid to the Public Sector Equality Duty (PSED). It is not considered necessary to undertake a full equalities impact assessment for these measures as the proposed changes are not considered to impact those with protected

[26] Technology Tracker: Wave 9, Report prepared for the Department for Transport (Ipsos report (publishing.service.gov.uk)), November 2022 (January 2025)

characteristics. The accessibility standard for public EV charging points (Electric Vehicles Accessible Charging Specification- PAS 1899) developed by the British Standards Institution (BSI) provides guidance to HAs and EV CPOs to ensure accessibility and inclusivity across the EV infrastructure.

133. There are no justice impacts associated with this policy change.

Risks and assumptions

134. We consulted organisations involved in this policy change on our preferred option. As part of this, HAs and EV CPOs were invited to answer technical questions to help inform our analysis. We have used responses to these questions to inform a number of assumptions made on processing and applying for section 50 licences and *Street Manager* permit applications.

135. The cost benefit analysis conducted in this assessment is informed by a range of key assumptions. To account for any uncertainties in our key assumptions, we apply three sensitivity tests to the central scenario for EV chargepoint growth. The table below summarises the tests and associated assumptions:

Table 1.6 Outline of sensitivity tests

Sensitivity Test	Sensitivity Test	Assumption range
1	Number of chargepoints covered by one section 50 licence.	Low: 3 EV CPs Central: 7 EV CPs High: 12 EV CPs
	Number of *Street Manager* applications required to cover one section 50 licence.	Low: 1 application Central: 2 applications High: 3 applications
2	Vary the time saved on applications by HAs.	Low: 3 hours Central: 5 hours High: 7 hours
	Vary the time saved on applications by EV CPOs.	Low: 5 hours Central: 8 hours High: 11 hours
3	Vary the costs saved on applications by EV CPOs.	Low: £405 Central: £594 High: £738

136. The first sensitivity test results outlined in Table 7 accounts for uncertainty on the number of section 50 licences currently being made and the anticipated number of *Street Manager* applications that will be made under the policy change.

137. We consulted EV CPOs on the number of EV CPs covered by one section 50 licence and use these responses to how sensitive our outputs are to this sensitivity as per the table above. As noted in the main body of the text, we make an unevidenced assumption on the number of *Street Manager* applications required to cover one section 50 licence

being two. Whilst unevidenced, this assumption is a best and sensible estimate. We test how sensitive our outputs are to this assumption using the range in number of applications required as above.

138. In lieu of centrally held information on the number of applications absent and under the policy change, we use ZapMaps data on the number of new chargepoints per year[27] and the assumptions on the first sensitivity test outlined in Table 6 Applying these sensitivities, we estimate that the number of section 50 licences per year in absence of the intervention could range between 788 and 3,150. We also estimate that the number of *Street Manager* applications required under the policy change ranges between 2,363 and 3,150.

139. All else held equal, varying the number of applications absent and under the policy change provides a range of results as outlined in Table 1.7:

Table 1.7 Results of sensitivity test varying numbers of applications

	Net Present Social Value (millions)	**Business Net Present Value** (millions)	**EANDCB** (millions)
Low	£3.25	£3.13	- £0.36
Central Scenario	*£7.85*	*£7.21*	*- £0.84*
High	£23.78	£21.23	- £2.47

140. The second sensitivity test outlined in Table 8 is on the time saved when completing and processing *Street Manager* permit applications compared to section 50 licence applications for both EV CPOs and HAs. We use evidence collected in the consultation to estimate a range of time savings as outlined in Table 1.6.

141. The time it takes HAs to process a section 50 application is estimated to be between 6 to 8 hours, meanwhile that for a Street Manager application is estimated to be between 1 to 3 hours. This results in HAs saving somewhere between 3 to 7 hours per application.

142. On the other hand, it is assumed that EV CPOs take 1.5 times longer to submit applications than it takes for HAs to process them. Therefore, it is estimated that EV CPOs take between 9 to 12 hours to submit a section 50 application, but it takes between 1.5 to 4.5 hours to submit Street Manager applications. This results in EV CPOs saving between 4.5 to 11.5 hours per application.

143. All else held equal, varying the amount of time saved by EV CPOs and HAs under the policy change provides a range of results as outlined in the table below:

Table 1.8 Results of sensitivity test varying time savings

	Net Present Social Value (millions)	**Business Net Present Value** (millions)	**EANDCB** (millions)
Low	£5.88	£5.89	- £0.68
Central Scenario	*£7.85*	*£7.21*	*- £0.84*
High	£9.83	£8.52	- £0.99

[27] EV charging statistics 2024 - Zapmap (zap-map.com). Also see Table 2 (January 2025)

144. The final sensitivity test results in Table 9 accounts for a range of possible application fees for both section 50 licence applications and *Street Manager* permit applications. We use evidence collected in the consultation and departmental charging schedules to determine a range of cost savings outlined in Table 1.6.

145. All else held equal, varying fees faced by EV CPOs absent and under the policy change provides a range of results as outlined in the table below:

Table 1.9 Results of sensitivity test varying number of applications

	Net Present Social Value (millions)	**Business Net Present Value** (millions)	**EANDCB** (millions)
Low	£4.82	£4.18	- £0.49
Central Scenario	*£7.85*	*£7.21*	*- £0.84*
High	£9.81	£9.16	- £1.06

146. As is evident from this sensitivity testing, the policy impact on business is small and will likely never see net direct costs to businesses exceeding the +/- £10 million de minimis threshold.

Monitoring and evaluation of preferred option

147. Following the renewed statutory guidance on conducting Post-Implementation Reviews (PIRs) under section 31 of the Small Business, Enterprise and Employment Act 2015, we believe it would not be appropriate to include a statutory review provision for this measure. The policy falls below the +/- £10 million de minimis threshold, suggesting it would be disproportionate to conduct a PIR and that the costs of doing so would likely outweigh any potential benefits. Additionally, with the unique and niche nature of this measure, it is unlikely that there would be further regulatory change which a PIR would help advocate for, making the inclusion of a review clause undesirable.

148. For these reasons, we believe non-statutory, light-touch monitoring and evaluation of the measure within five years of its implementation would be more suitable and proportionate to conduct. The level of evidence and resourcing required for this would be low, as the measure falls beneath the de minimis threshold. Monitoring and evaluation for this policy will be based on evidence from light stakeholder engagement and analysis of *Street Manager* data. This evidence could be used to assess whether the policy change has broadly achieved its objectives through providing greater clarity on some key areas of interest, specifically:

- Impact of the policy change on the costs faced by EV CPOs when making street works applications;
- Impact of the policy change on the amount of time HAs and EV CPOs spend processing and making street works applications;
- Impact of the policy change on reducing regional disparity in the installation of EV chargepoints;
- Any potential unintended consequences of the policy around coordination of street works and disproportionate costs for small EV CPOs and;
- Any potential risk that benefits are not realised due to a lack of regulatory scrutiny, emerging technologies, or a less than expected growth in EVs

149. We will not aim to assess the impact that this policy change has had on the uptake of EVs or the EV market more generally. The level of evidence required to understand the causal impacts of granting EV CPOs statutory rights on EV chargepoint installation is high. If we observe an increase in the number of EV CPOs installed, it is difficult to attribute that increase to granting EV CPOs statutory rights. It could be due to general EV market growth and exogenous factors.