

Written evidence submitted by The Association for Renewable Energy and Clean Technology (EVS0008)

The Association for Renewable Energy & Clean Technology (REA) is pleased to submit this response to the above call for evidence. The REA represents renewable electricity, heat and transport, as well as Electric Vehicle charging infrastructure, Energy Storage and Circular Economy companies. Members encompass a wide variety of organisations, including generators, project developers, fuel and power suppliers, investors, equipment producers and service providers. Members range in size from major multinationals to sole traders. There are around 550 corporate members of the REA, making it the largest renewable energy and clean technology trade association in the UK.

RECHARGE UK, formerly the REA EV Forum represents over 108 companies operating across the electric vehicle charging infrastructure value chain, from public Charge Point Operators to energy suppliers, e-Mobility Service Providers, roaming hubs, installers, manufacturers, and financiers. The REA's EV Forum has been active since 2018 and in 2020 the UK Electric Vehicle Supply Equipment Association merged its operations into those of the REA.

RECHARGE UK summary of members views of this response

This consultation response focuses on the key issues of concern to RECHARGE UK members. Overall, RECHARGE UK is pleased to see some progress with the EV Infrastructure Strategy but note that many areas could be improved by changes to policy and regulations to allow more people the ability to charge their vehicle.

This consultation response therefore focuses on:

- Unlocking private investment in UK charging infrastructure.
- Accelerating onstreet charging rollout
- Amending PAS 1899 to allow innovative solutions to support disabled drivers.
- Unlocking the full potential of domestic charging
- Enhance public/private sector collaboration to accelerate public charge point deployment
- Accelerating the rollout of cross pavement solutions, so those without a driveway have increased choice on how they can charge their vehicle

Unlocking private Investment

To date our members report that although the LEVI fund has been helpful in supporting chargepoint rollout, a number of our members with large private investment plans report that many local authorities have prioritised rollout through Government funds and putting on hold applications for private investment. Many of our members who report they simply don't need the funds report that they are left with no choice but to apply to a LEVI tender to get their chargepoints in the ground.

Government must seriously consider providing local authorities with more resources, and/or national technical and contractual framework to allow them to process multiple application types of both privately funded, and Government funded chargepoint rollout.

More widely it is clear that the Government must provide certainty in the Zero Emissions Vehicle Mandate to provide investor certainty. An REA snap poll post the Sunak

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Government's reversal of the end of sale of ICE vehicles from 2030 to 2035 cost hundreds of millions of pounds in planned investment in EV charging infrastructure. Furthermore, many REA members reported in the following weeks and months that their funding rounds were far lower than targeted, with some reportedly missing more than 50% of their planned funding due to investor uncertainty. In order to accelerate chargepoint rollout we must see a strong ZEV mandate with sales targets and flexibilities that provide a clear ramp up of electric vehicles on UK roads.

One way to stimulate extra demand in EVs and provide certainty that there will be rising demand for charging sessions is to provide demand side incentives to fund EVs. This could be a scrappage scheme which has been shown to be effective in stimulating demand for EVs globally. To date utilisation of public chargepoints is lower than expected with some CPOs reporting utilisation of only 9%.

Until 2022 Cyprus had zero incentives until 2022, where they then granted drivers up to €20,000 to buy a BEV (€80,000 or under) and to scrap their old car in the process. While Romania over the period 2020-23 introduced a grant of €11,500 (up from €11,250) to purchase a new BEV and scrap their old car, seeing a rise in EV sales of 79%¹.

In the past the UK enjoyed a successful scrappage scheme that saw in over 300,000 cars scrapped and replaced with lower emission vehicles².

More recently in 2024 Transport for London received over 54,000 applications for their ULEZ scrappage scheme, demonstrating the appeal of scrappage schemes in stimulating cleaner vehicle purchases³.

Accelerating On Street ChargePoint Rollout

In addition to LEVI, on street chargepoint rollout could be accelerated in two ways. One way is to allow CPOs to select sites. CPOs have invested in sophisticated tools that enable them to conduct extensive research identifying sites that generate higher utilisation, improving commercial sustainability, more efficient deployment, and installing critical charging infrastructure where people will most benefit. In Europe, CPOs can select commercially viable sites, allowing them to lower consumer costs. In contrast, UK local authorities often designate sites, leading to lower utilisation rates and higher costs. To benefit the consumer and accelerate private investment in UK charging infrastructure, Government must allow CPOs through a lotting model to deploy charging infrastructure using their own data insights.

In 2021 the Government consulted on the Future of Transport regulatory Review for EVs. In 2023 the Government responded to this consultation⁴ and concluded that they would mandate local authorities to have charging plans in place, at the time less than 50% had. However, the Sunak Government ran out of time to legislate for this. This was a severe missed opportunity that could have avoided geographical charging inequality if all local authorities had clear plans in place to deploy charging infrastructure. This Government must

¹ <https://www.motorfinanceonline.com/news/incentives/?cf-view>

² <https://www.gov.uk/government/publications/car-scrappage-scheme-in-2009>

³ <https://tfl.gov.uk/modes/driving/ultra-low-emission-zone/scrappage-schemes>

⁴ <https://www.gov.uk/government/consultations/future-of-transport-regulatory-review-zero-emission-vehicles/future-of-transport-regulatory-review-zero-emission-vehicles>

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urgently reexamine this policy commitment and urgently put this forward to address geographical charging inequality demonstrated in REA member Believ's 2023 local authority survey⁵.

For this to be done successfully Government must also consider extending the LEVI capability fund to ensure that local authorities continue to be able to employ staff to oversee and rollout charging infrastructure and implement their charging plans. We understand so far that our local authority members and other local authorities see this as crucial in being able to continue rolling out charging infrastructure at pace. Without it Government risks a slowdown in onstreet charging rollout crucial particularly for the 1/3 of drivers who do not have a driveway in the UK.

Allowing for innovation in PAS 1899

The REA sits on the industry review group for PAS 1899 coordinated by the BSI and OZEV. The REA is currently leading on reviewing how PAS 1899 could be improved to incorporate new charging innovations. PAS 1899 is the UK specification launched in 2022 to provide guidance on accessible EV charging design and spatial lay out. Since its publication it is reported that no chargepoint is currently PAS 1899 compliant.

One reason for this is that chargepoints have become increasingly innovative since its publication in 2022 and despite REA members consulting with disabled led organisations and charities in designing their chargepoints they are not considered to be PAS 1899 compliant. We see this as a great opportunity for members of the REA and the wider charging infrastructure sector to work with Government and BSI on redesigning PAS 1899 to be fully workable for CPOs including those who continue to innovate and go beyond the norm. This will help ensure that inclusive design is built in from the start. Furthermore, the streetscape is very difficult with kerb heights and the width of pavements to currently ensure PAS 1899 conformity and so more thought must be taken in future to ensure that there is a scale to that PAS 1899 conformity based on the streetscape that considers these variable factors more clearly. This will allow local authorities and CPOs to make decisions in the design of their installations regarding accessibility.

One issue that has been raised in recent workshops between Government and industry has been that many CPOs are reliant on 3rd parties who manufacture chargepoints and components outside of the UK for global markets. Across much of Europe, the US and further afield there exists contradictory accessibility standards, and regulations which make difficult compliance with PAS 1899 when it contradicts wider regulations for larger markets elsewhere. Ideally the future of PAS 1899 should be decided internationally by Disability Groups, chargepoint manufacturers, CPOs and vehicle manufacturers (who are not included in existing industry roundtables). The REA has pre-existing strong international connections which would enable us to lead on this project and would be happy to support this consultation in establishing this group.

⁵ <https://www.believ.com/local-authority-survey/>

Unlocking domestic charging

There are currently somewhere in the region of a million domestic and workplace chargepoints in the UK. There are two ways that more could be built and that they could be opened up more widely to address geographic inequality.

Firstly, the Government must consider the nearly 10 million renters in the UK who rely on their landlord to install a chargepoint. For them there is a clear answer that the Government has yet to explore. The introduction of Right to Charge. A Right to Charge is where a landlord will give always install a chargepoint at the request of their tenant unless it goes beyond certain limits such as impacting on the ability of others to use the space if the space is communal and if the cost of the grid connection goes over a certain limit. We have attached a full briefing on the Right to Charge that we have also shared with OZEV in 2024. Such a policy would allow for far more people to feel they can adopt an EV, with the ability charge at home often flagged in surveys as a key enabling factor in EV adoption.

Secondly, is the ability of domestic chargepoints to be shared with the wider public through an app or service. One REA member Co Charger already offers such a service and currently sits as the second largest charging network in the UK. Driveway sharing works by the owner opening up their driveway and chargepoint to be used by users of an app or service like Co Charger. This enables users to access charging near by their home or where they are staying while also on a domestic tariff. One way the Government could encourage chargepoint sharing is through a small grant, we would suggest in the region of £150 for chargepoint owners to open their chargepoint up when not in use.

Accelerating cross pavement solution rollout

Lastly, to further encourage EV adoption, Government must also see the value in cross pavement solutions as part of an EV infrastructure strategy. Cross pavement solutions work by connecting the domestic electricity supply through, under or over the pavement to a vehicle parked on street. They have successfully been deployed across the UK already with some local authorities already going beyond trial phases. A grant was established for them in 2024, but no guidance was published for local authorities in implementation until December 2024. This has been a major hurdle with many local authorities stating they would rather wait until guidance is published, despite trials already showing the effectiveness of cross pavement solutions to date. Government must urgently include cross pavement solutions within wider strategies and future Government funding to ensure that those living without a driveway are able to access charging on a domestic tariff, which will overall be better for the consumer. Cross pavement solutions must therefore be included with in local strategies alongside onstreet charging to ensure that all ways to encourage EV adoption and improve charging infrastructure rollout are used.

The grant level of £350 only represents around 15% of the cost to the consumer of installing a full cross-pavement solution at their property. This does not provide enough of an incentive for the market to achieve scale, in the same way that home charging did starting in 2013 when the grant was 100% of the cost. Recognising that there were some unintended outcomes at that level, we expect that £1000 would be a good opening position,

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representing around 50% of the consumer cost once planning permission costs were removed via the implementation of permitted development rights.

Government must therefore urgently consider the above as part of a new Near Home Charging strategy to encourage EV uptake among those with out a driveway. Near home charging solutions, be it cross pavement, driveway sharing, or on street charging are all crucial to the successful rollout of EVs and we would strongly encourage Government to go further and be bolder in encouraging the rollout of near home charging solutions.

Conclusion

The REA and its RECHARGE UK members appreciate the opportunity to contribute to this consultation. While progress has been made with the Electric Vehicle Infrastructure Strategy, key challenges and opportunities remain. Our recommendations highlight the urgent need for targeted policy changes and regulatory improvements to support the UK's EV charging infrastructure.

Key points include:

- **Unlocking Private Investment:**

- Address barriers that discourage private investment in EV infrastructure, including reliance on LEVI funds.
- Provide local authorities with resources and frameworks to manage both public and private investment applications efficiently.
- Establish a strong Zero Emissions Vehicle (ZEV) Mandate to provide long-term investor confidence.

- **Accelerating On-Street Charging Rollout:**

- Enable Charge Point Operators (CPOs) to select commercially viable sites to improve utilisation and reduce costs.
- Mandate local authorities to develop and implement charging plans to reduce geographic inequality.
- Extend the LEVI Capability Fund to support local authority staff in delivering charging strategies.

- **Enhancing PAS 1899 for Accessibility:**

- Revise PAS 1899 to accommodate innovative designs and variable streetscapes.
- Work with the charging sector and disability groups to ensure practical, inclusive standards for all installations.

- **Unlocking Domestic Charging:**

- Introduce a "Right to Charge" policy to empower tenants to request charge point installations.
- Support domestic charge point sharing services with small grants to expand public access to charging infrastructure.

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- Review of cross-pavement charging installations with clear guidance for local authorities on safe installation practices, liabilities, and ongoing maintenance agreements to ensure cross pavement public spaces do not create future hazards for pedestrians.

The REA remains committed to collaborating with the Government, industry stakeholders, and local authorities to address these challenges. Together, we can accelerate the transition to a cleaner, greener, and more accessible future for electric mobility in the UK.

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