

## Written evidence submitted by Transport for London with London Councils and the Greater London Authority (GLA) (EVS0016)

### Summary

We welcome the opportunity to provide evidence to the Public Accounts Committee inquiry into Progress with the UK's [Electric Vehicle Infrastructure Strategy](#), building on the National Audit Office's investigation into how successful the Government has been in identifying and mitigating the challenges likely to impede a successful rollout of charging infrastructure.

Please see below our joint response with London Councils and the Greater London Authority (GLA) to the call for evidence on:

- If the Department has a strategy to address the geographical disparities in the availability of EV charging points
- If sufficient funds are available to support local authorities to install public charging stations and
- The accessibility of public charging infrastructure

### 1 Does the Department have a strategy to address the geographical disparities in the availability of EV charging points?

1.1 London published its Electric Vehicle Infrastructure Strategy<sup>1</sup> (EVIS) in December 2021, ahead of the national strategy. It builds on our 2019 EV Infrastructure Delivery Plan, which identified how the public and private sectors could work together to ensure London has the right type and amount of charging infrastructure, steered by the Mayor's EV Infrastructure Taskforce. It also acknowledges uncertainties with vehicle uptake, driver charging behaviour and changes in technology that may impact on how much public infrastructure London will need in the future. In line with the Mayor's Transport Strategy target to have 80 per cent of trips made by walking, cycling or public transport, our Strategy focuses on the needs of key EV user groups and how we can support their transition to zero emission vehicles. Key users are identified as those making high-mileage trips performing an essential role, such as taxi, private hire vehicle and commercial vehicle drivers, as well as people who are less able to walk, cycle or use public transport for their journeys.

1.2 As with the modelling underpinning the national strategy, London's EV infrastructure modelling does not have a spatial component, with London-level inputs and forecasts. EVIS sets out that London will need between 40,000 to 60,000 public charge points by 2030, of which up to 4,000 would need to be rapid charge points. We welcome the National EV Insights and Support tool, developed by Cenex, which provides more granular forecasts at local authority level and enables London boroughs to develop and refine their own EV infrastructure strategies to deliver infrastructure to meet local demand. We have liaised with Cenex in their development of the tool, providing London data.

1.3 While EVIS does not provide a borough-level breakdown of infrastructure requirements, it does recognise that a good geographical spread of charging infrastructure will be needed, with slow to fast charge points required in locations where key user groups live and a good spread of rapid charge points, including hub provision in locations where key user groups operate, including near to strategic roads, airports and transport hubs, and central London and town centres. With continuing slow to fast infrastructure delivery by London boroughs, utilising government funding streams<sup>2</sup>, as well as private sector delivery of rapid and ultra-rapid charge points we have seen the total number of public charge points in

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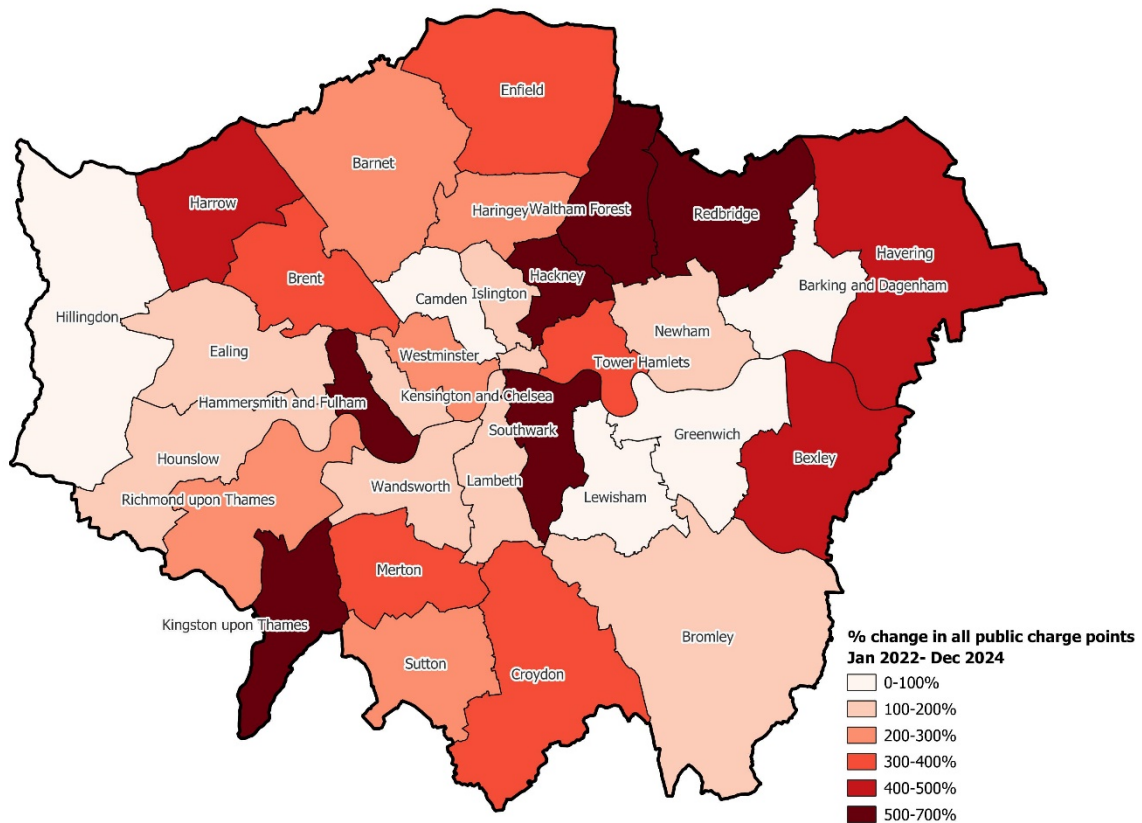
<sup>1</sup> <https://tfl.gov.uk/modes/driving/electric-vehicles-and-rapid-charging#on-this-page-3>

<sup>2</sup> Go Ultra Low City Scheme (GULCS) and On-street Residential Charging Scheme (ORCS)

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London increase from 6,155 in January 2022 to 22,211 in December 2024.

- 1.4 As shown in figure 1, we have also seen the geographical spread of infrastructure improving across London, including in outer London boroughs, which had relatively lower infrastructure coverage than central and inner boroughs. We support the focus of the Local EV Infrastructure (LEVI) capital funding allocation, considering variables around the need for EV charging and existing progress in local authority delivery. We also welcome the LEVI capability funding and the additional resource this has allowed us to provide to support the London boroughs in preparing their local EV infrastructure strategies, LEVI applications and infrastructure delivery. The LEVI funding should lead to an improved geographic spread of infrastructure, both in London and outside the Capital and we would like to see monitoring and reporting on improved geographic spread in coming years.



**Figure 1: Percentage increase in public charging infrastructure by borough in London, since the publication of the London EV Infrastructure Strategy (DfT and Zapmap)**

- 1.5 In our own delivery of rapid charge points, TfL has also focused on ensuring a good geographic spread of infrastructure in London, including rapid charging hubs. Between 2017 and 2020, TfL delivered around 300 rapid charge points, including around 80 taxi-only rapid charge points, and supported delivery of three rapid charging hub sites. At the time, there was almost no rapid charging infrastructure in London. A rapid charging network was vital to support TfL's introduction of zero emission capable licensing requirements for taxis and private hire vehicles, enabling drivers to quickly top-up their batteries during shifts. TfL's rapid charge point delivery also demonstrated to the private sector that there was a valid business case for investing in rapid charging in London, and we have since seen the number of rapid charge points increase from 515 in January 2021 to over 1,300 in December 2024 through private sector delivery.

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- 1.6 TfL is continuing to deliver rapid charge points, as per the keystone commitment in EVIS to unlock Greater London Authority (GLA) Group land for EV charging. We aim to deliver 100 rapid and ultra-rapid charging bays on the TfL Road Network, with preparatory and installation works commencing in February 2024. In addition, London boroughs are also working with charge point operators to unlock their own land for rapid charging, with support from TfL and London Councils.
- 1.7 In December 2024, Places for London, TfL's property company, selected Fastned as its joint venture (JV) partner to develop a network of new ultra-rapid charging hubs across its estate. Each site will deliver a minimum of six ultra-rapid charging bays, using 100 per cent certified renewable energy, with five initial locations, delivering over 70 bays in total. Construction at the first of the five sites is expected to begin during 2025, and open to customers in 2026. Places for London have also been developing a pipeline of potential EV charging hub sites, to help ensure that the joint venture can start delivering charging hubs at scale, and across a wide geography, as quickly as possible. The JV business will also allow for a portfolio approach to deployment, with higher performing sites supporting the deployment of hub locations in less commercially attractive areas. This approach is intended to be used by the JV to help to address the geographical disparities in availability of charge points across London.
- 2 **Are sufficient funds available to support local authorities to install public charging stations?**
  - 2.1 London Councils and TfL are supporting London boroughs to access and utilise the approximately £41.2m in LEVI funding allocated to London, which includes almost £35.8 million in capital funding and £5.2 million in capability funding. So far, boroughs have received approximately £12.2 million of the capital funding, with more to be distributed throughout 2025, pending OZEV's approval. TfL and London Councils received £3m of capability funding over the three financial years to 2024/25, with a further £2.2m made directly available to boroughs in 2024/25.
  - 2.2 TfL, London Councils and the Greater London Authority have previously demonstrated the benefits of a centralised coordination and support function, with strategic oversight and shared resource for the London boroughs through our Go Ultra Low City Scheme (GULCS) delivery, which successfully delivered 4,500 charge points, more than double the anticipated number, using £13m of funding. London's approach to utilising LEVI funding builds on this success and the centralised support function has provided a vital role in assisting boroughs who often lack the internal resource required.
  - 2.3 Eight boroughs have dedicated EV infrastructure officers, with two more boroughs currently recruiting to posts. The remaining 23 boroughs do not currently have dedicated EV infrastructure officers.
  - 2.4 As London's charging network expands there will be increasing pressure on boroughs to manage the infrastructure and associated contracts. Boroughs have expressed concerns that they currently do not have the necessary skills and resources in place to manage this effectively. London Councils is exploring how support for this might be provided centrally, however additional/longer term funding would provide the certainty needed for longer term planning, delivery and ongoing management of a fit for purpose, accessible charging network that residents and businesses need to make the transition.
  - 2.5 Any future government funding schemes for EV infrastructure should be designed with an

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element of flexibility for funding to be used to address particular circumstances and consider local needs and delivery to date. The LEVI fund provided mainly for the provision of low power charging, which does not reflect the needs of all the London boroughs, particularly in central areas with high existing provision. Additional support for faster charging, where high installation costs and grid reinforcement to permit rapid charge points would be beneficial where site-specific conditions can often double installation costs, making them unfeasible on a purely commercial basis.

### **3 Accessible public charging infrastructure**

- 3.1 As with the national strategy, London's EVIS recognises that public charging infrastructure should be physically accessible, available, easy to use and should not impede or constrain people's movements on the footway. We welcome the publication of the BSI's PAS1899 accessible charging standard and will continue to contribute to the working group looking to refine the standard to address challenges with delivering compliant infrastructure, particularly on-street.
- 3.2 We are aware that there is no record of which public infrastructure in London is accessible for disabled drivers. We plan to undertake research in Spring 2025 to help drivers identify which charge points in London meet their specific needs, even if the charge point does not comply with the PAS1899 specification. This research will also consider infrastructure suitable for larger vans. The outcomes of this work will inform new commitments for our updated EV infrastructure strategy in 2025, to deliver accessible EV infrastructure in London and we will share the findings with Motability Foundation and OZEV.
- 3.3 TfL and the boroughs require that charge point operators address how they maximise accessibility through their procurement, including reference to the PAS1899 standard. Places for London's JV will design all hub sites to be industry leading in accessibility, with every bay wheelchair accessible, considering PAS1899. Due to the nature of the surrounding environment, the JV will not be able to make every EV charging space to the full PAS requirements but will aim to maximise where we can. The higher of at least one bay at every hub or 8 per cent of bays will be fully accessible. Accessible charging bays are also likely to be suitable for larger vans.
- 3.4 London Councils has also established a London dynamic purchasing system (DPS), which provides a consistent set of procurement documentation for boroughs and charge point operators, including reference to accessibility. The provision of accessible of charge points for residents is a key focus for boroughs, particularly where site specific conditions and the design of charging infrastructure can make this challenging. The DPS is designed to streamline the procurement of charging infrastructure, making it easier for suppliers to bid for contracts for local authorities to manage their purchasing. It will run for a four-year period and is also available to councils and public sector organisations outside of London.
- 3.5 As the PAS1899 standard continues to evolve, we would like to see the government consider how to encourage compliance. We are aware that some charge point operators and land owners are prioritising accessibility in their infrastructure delivery, but consider that there is some way to go before sufficient infrastructure is accessible to disabled drivers. Further funding from government could support local authorities and transport authorities to make physical changes to help comply with the standard, which would otherwise be a barrier with existing delivery models. For example adapting parking bays, installing dropped kerbs and undertaking ground works to make surfaces level.

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- 3.6 We are also aware from our engagement with commercial vehicle operators and key stakeholder groups that there is a lack of public charging infrastructure suitable for larger vans, as well as a lack of information available to help van drivers identify any suitable charging bays. Drivers would also like assurance that they could access suitable charge points when required, such as through booking systems or priority access to charging bays. We would like to see guidance and support from government for charge point operators and land owners to support the delivery of public charging infrastructure suitable for larger vans.

**January 2025**