URBAN TRANSPORT GROUP

Wellington House, 40-50 Wellington Street,
Leeds LS1 2DE

T 0113 251 7204
E info@urbantransportgroup.org

www.urbantransportgroup.org

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Future of Transport Regulatory Review
Department for Transport Zone 1-3, Floor 3
Great Minster House
33 Horseferry Road
London SW1P 4DR

FUTURE OF TRANSPORT REGULATORY REVIEW: ZERO EMISSION VEHICLES

Background

The Urban Transport Group (UTG) represents the seven largest city region strategic transport bodies in England, which, between them, serve over twenty million people in Greater Manchester (Transport for Greater Manchester), London (Transport for London), the Liverpool City Region (Merseytravel), Tyne and Wear (Nexus), the Sheffield City Region (South Yorkshire Passenger Transport Executive), the West Midlands (Transport for West Midlands) and West Yorkshire (West Yorkshire Combined Authority).

We also have the following associate members: Tees Valley Combined Authority, Strathclyde Partnership for Transport, West of England Combined Authority, Nottingham City Council, Translink (Northern Ireland), Transport for Wales and Cambridgeshire and Peterborough Combined Authority.

Our members plan, procure, provide and promote public transport in Britain's largest city regions, with the aim of delivering integrated transport networks accessible to all.

Response

We welcome the opportunity to respond to the *Future of transport regulatory review: zero emission vehicles* consultation.

Our member areas all have ambitious targets for achieving net zero carbon emissions in the coming years and decarbonising transport will be a key part of this. In addition, priorities around improving air quality will require a shift to electric vehicles where public transport or active travel do not provide viable or practical alternatives. In order to deliver the transport decarbonisation targets, we need a rapid expansion of electric charging infrastructure, however, the outcome of delivering more charging infrastructure should be the priority, rather than who delivers that. It is important that the shift to zero emission vehicles, and the provision of the charging infrastructure they require, is not considered in

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isolation, but as part of a strategy for decarbonising the whole transport system, including modal shift and reducing the need to travel. It is also critical that the shift to zero emission cars is not to the detriment of public transport use and active travel.

Local authorities should be empowered to provide electric vehicle charge points to service residents, businesses and visitors within their areas. Local and city region authorities are well placed to bring together energy, transport and land-use planning in order to deliver charging infrastructure that serves the whole community. However, without sustained funding, both capital funding for installation of infrastructure and revenue funding for resource and capacity to plan for chargepoints, local authorities will be unable to deliver on this. Authorities will need to work closely with industry to ensure that installations are not overtaken by technological development. The public sector also has a key role to play in supporting charging that may be less commercially attractive to industry but may be of social importance (Q5-9).

We welcome the introduction of requirements for landowners to provide a minimum level of EV charging infrastructure in non-residential car parks. This would also help to integrate EV infrastructure with wider public transport networks, for example, by including charge points at park and ride or railway station car parks. This should apply to car parks that are both publicly and not publicly accessible (Q21). Reasonable exemptions should apply. This could include exemptions for Local Authority car parks where the connection costs are prohibitively high, that are not well suited to supporting charging infrastructure or could be potential sites for future development (Q22).

The costs and benefits of installing chargepoints in non-residential car parks are complicated and depend on the type of car park being considered. There are clearly financial costs associated with the installation of chargepoints and potential disruption while the installation takes place. New users may be attracted by the installation of chargepoints. Where chargepoints are installed at car parks associated with transport infrastructure there could be benefits for attracting new users to, for example, a park and ride facility. Conversely, cheap EV charging in city centre car parks could draw customers away from public transport, having negative consequences for congestion and other urban public policy outcomes. (Q29-30)

We agree that there should be mandated standards for public charge points and that includes the area around the parked car and the chargepoint. There are increasing reports of disabled people who are unable to use EV chargepoints and trailing cables that create a hazard for pedestrians and anyone else moving around the vehicle. Mandated accessibility standards will help to prevent this in future chargepoint design, installation and use. (Q53-54).

There may be a necessity for accessibility standards for private residential chargepoints where they have an impact on the general public, for example, if cable were to cross the pavement, causing a hazard. Mandating accessibility standards for private residential chargepoints would also help to future proof the installation, for any needs of future residents of that home. (Q57)

There should be requirements for industry participants to provide a safe charging experience at public chargepoints, taking into account lighting and other considerations such as isolation and footfall. (Q58)

Yours faithfully,

Dr Clare Linton
Policy and Research Advisor

clare.linton@urbantransportgroup.org