



Motability Foundation response to the Environment and Climate Change Committee consultation on Electric Vehicles

About us

The Motability Foundation is a registered charity set up in 1977. The Motability Foundation funds, supports, researches and innovates so that all disabled people can make the journeys they choose. The Foundation oversees the Mobility Scheme and provide grants to help people use it, providing access to transport to hundreds of thousands of people a year. The Foundation awards grants to other charities and organisations that provide different types of transport or work towards making transport accessible. We also carry out ongoing research, in partnership with disabled people and key stakeholders in the industry, to inspire innovations that continue to champion accessible transport for all.

Background

We welcome the opportunity to contribute to the House of Lords Environment and Climate Change inquiry on Electric Vehicles (EVs).

The accessibility of charging infrastructure for EVs, and barriers that many disabled users are encountering in transiting to EVs has been identified by Motability Foundation as a priority area. It is predicted that by 2035, the number of disabled drivers or passengers will increase to 2.7 million¹. With many reliant on car travel to support their independence, freedom and wellbeing, Motability Foundation wants to ensure electric vehicle charging is inclusive for all.

In terms of our response, we have largely focused our answers on our evidence and research which we view as being particularly relevant. This submission is separate to but aligned with that of Motability Operations who deliver the Motability Scheme under our oversight. We would be pleased to discuss our research and responses in more detail with members of the Committee.

¹ [Electric Vehicle Charging Infrastructure for People With Disabilities, p.iii](#)

Response to Question 21. What does the charging infrastructure for EVs need to develop to meet the 2030 target? Does the UK need to adopt a single charging standard (e.g., the Combined Charging System (CCS)) or is there room in the market for multiple charger types?

Motability Foundation believes that every charge point should be accessible by 2030 so that the UK's transition to Net Zero emissions is fully inclusive. A report from the Research Institute for Disabled Consumers (RiDC)² tested the experiences of disabled drivers with EVs, identifying a range of specific challenges with design features, such as high kerbs, inadequate space for wheelchair users around the charge point and heavy cables.

The lack of supply to accessible charging infrastructure – whether on the street, at the office, or at home - means the future demand of disabled consumers and possibly other consumer groups as well will not be met. We must also note that disabled people are far less likely to be able to rely on public transport than people without disabilities – as demonstrated in our Transport Accessibility Gap report.³

Previous research we conducted with Britain Thinks and the National Centre for Social Research found that disabled people use buses, coaches and trains less than people without disabilities. 55% of disabled adults never use trains or use them less than once a year, compared to 3% of people without disabilities.⁴ Therefore the use of private vehicles and the ability to be able to independently refuel and recharge is of paramount importance to this group.

Many different stakeholders are responsible for creating EV charging infrastructure – from local councils who often procure chargepoints, to the manufacturers who make the parts, the installers who put the chargepoint in the ground, the companies that provide and manage a charging network, and the distribution network operators who supply the energy. The main challenge cited by industry is that there is no clear understanding of what “accessible” looks like in practice for the diverse range of disabled drivers. This is an international problem – our research suggests that even countries ahead of the UK in transitioning to EVs do not have design standards for accessible charge points.

We would recommend the adoption of a single charging standard to ensure that the transition to EV charging remains equitable for all users. Last year, in partnership

² [Going Electric?](#) Research report into the accessibility of plug-in electric vehicles, 2020

³ [Transport Accessibility Gap, 2022](#)

⁴ Motability: Secondary Analysis of the National Travel Survey (NTS) 2018 (NatCen, 2020). Available upon request

with the Office for Zero Emission Vehicles (OZEV), Motability Foundation sponsored the British Standards Institute (BSI) to develop the world's first national accessible charging standard, PAS 1899⁵. The standard defines the minimum accessibility requirements for all public chargepoints, as well as supplementary best practice guidance. Making charge points accessible can also benefit everyone, especially older people and those with young children. The standard also covers good practice guidance for improving safety around chargepoints.

Response to Question 24. In terms of charging infrastructure, are there unique barriers facing consumers in areas of low affluence and/or multi-occupancy buildings, such as shared housing or high-rise flats? Do you consider public EV charging points to be accessible and equitable compared to home-charging points? What can be done to improve accessibility and equity?

There are unique barriers facing consumers with disabilities using public charging points for the reasons outlined in our response to question 21. Research with Ricardo estimates that there will be 2.7 million disabled drivers or passengers by 2035, with 50% - 1.35 million expected to be partially or wholly reliant on public charging infrastructure. Of that 1.35 million, 0.93 million of the total number of disabled drivers are unlikely to be able to charge their vehicle at home, with 0.54 million within that being dependent on on-street parking to park and charge, and the remaining 0.39 million unlikely to have adequate on-street charging either.⁶ It is therefore imperative that public charging infrastructure is made accessible to disabled people so they may be able to charge their vehicle.

In addition, families that include a disabled adult or child have significantly lower median incomes than families in which nobody is disabled, and less likely to own their own homes.⁷ People who currently have to use a public EV charging point need to pay 20% VAT to charge their vehicles, compared with the 5% VAT for people charging at home, and therefore disabled users are more likely to be financially impacted by the costs for off street charging. Although we do not take a formal policy position on this, we note there has been significant calls from the manufacturing sector to cut VAT on public EV charging to help make owning an EV fairer and more attractive, which is something Government may wish to consider.

⁵ PAS 1899: 2022: Electric vehicles – Accessible charging – Specification, contains the best available evidence on making EV charging accessible for disabled people, and can be downloaded [here](#)

⁶ [Electric Vehicle charging infrastructure for people living with disabilities](#), ibid

⁷ [UK disability statistics](#), House of Commons Library, 2023, p.24

Response to Question 33. What role do you see local authorities playing in the delivering the 2030 phase out target, particularly in relation to planning regulations, charge points and working with District Network Operators? How can government best support local authorities in their roles?

Local authorities have a key role to play in helping to deliver the phase out target, and also in ensuring that public EV infrastructure is fully accessible to the 2.7 million disabled drivers and passengers that the UK is estimated to have by 2035.

Local authorities in England are able to apply to the UK Government's £450m Local Electric Vehicle Infrastructure (LEVI) funds, and this scheme aims to further support the roll-out of EV charging infrastructure. Motability Foundation is keen to support local authorities in ensuring that their public EV infrastructure is compliant with the PAS 1899 standard and fully accessible to disabled users, and we have written to local authorities in England to offer support to ensure chargepoints in local areas are accessible to disabled people.

Motability Foundation is continuing to support the uptake of the PAS 1899 standard. We know from our engagement with industry that providers and manufacturers are keen to have a way of checking if their chargepoints conform with PAS 1899. In response to this we will provide an endorsement to the assessment schemes that we determine to be the best in checking whether a chargepoint, site, or network complies with the standard.

We hope to have our first Motability Foundation endorsed assessment scheme in place in autumn 2023. This will be beneficial to local authorities as it help them to ensure that their infrastructure conforms with the PAS 1899 standard and is therefore accessible for disabled people who live and visit their areas.

Applications for LEVI funds will be asked to prove how they have considered accessibility and implementing the PAS 1899 standard. It may be in the interests of Government and industry to encourage take up of the standard, including looking at the possibility of mandating, to ensure in future all disabled drivers can charge accessibly and confidently.

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