Devon CC Electric Vehicle Charging Strategy Consultation Dec 2022

Transition Tavistock response

[This consultation used an online form which did not provide any facility for saving answers. These are the notes we prepared prior to filling it in. For all scale questions re agreement key is:

SA strongly agree, AA agree, NX neither, DD disagree, SD strongly disagree.]

Q1-11 cover organisation name, location, [irrelevant] current / future vehicle use.

Q12 Do you support the idea of Devon County Council having an EV charging strategy? SS

Q13 Agreement with aims? Strongly support each of them.

Q14/15 Recommendation 1. Accelerate charge point deployment to promote EV uptake. AA

Tavistock currently has only two publicly accessible chargepoints (at Tesco) and we see this lack of visible infrastructure as a factor in slow take up of EVs in West Devon. Planning to the mid-point projection of demand is reasonable, but given the uncertainty in this prediction it is important that the Council has arrangements to adjust the pace as trends change.

Q16/17 Recommendation 2. Focus on residential charging. AA

We agree that the Council should focus on residential charging. We have some reservations about the priority rules. It is important for public acceptance of action on climate change that measures are perceived as fair, so public investment should help redress the unequal access to off-street parking within towns, and the needs of rural residents with no alternative to car use. It is important that if using predicted EV ownership or predicted demand as a factor this does not lead to a concentration of facilities in already privileged localities. We suggest an overarching aim of "Right chargers, right place, right price."

Re 2a. Lamppost charging where technically feasible is preferable as being least intrusive for pedestrians.

Re 2b. We recognise that suitably designed and maintained pavement gullies may be the most pragmatic solution in some places. However it is important to keep in focus position of pedestrians at the top of the transport hierarchy. It needs to be very clear whose responsibility it is to check that the gully cover does not tilt and become a trip hazard, and that the Council is proactive in enforcing this through maintenance or enforcement.

We think that cables on the surface of a pavement are unacceptable even when covered with a cable protector. They turn a relaxed stroll down a street into an obstacle course, and cause particular risk to pedestrians with impaired sight. Carefully drafted guidance about situations where this is acceptable might protect the Council's legal position but would not be understood by the public, who are likely to assume that rules – or lack of them – are the same across the county. Application for permission could presumably be challenged by neighbours, but many others would be inconvenienced but have no means of checking whether a permit was in place.

Our experience with badly placed A boards or unlicenced street cafes is that those affected – particularly if older or disabled – feel unable to complain to the property owner, may not know which authority to tell about it, and rarely see any action when they do. The Council promotes active travel. That includes people being able to walk at a reasonable pace, enjoying conversation or the view, around their town or village, without having to look out for the next cable at their feet.

Note that this concern also applies in the many Devon streets where there are residential properties without drives but no pavement at all.

Re 2c. This could be more strongly worded. County, district and town / parish councils all own and operate car parks, and these are usually in safe, accessible locations. Moreover car parks at some other public facilities, eg schools and healthcare settings, get little use at evenings and weekends, so could make charging available to the public then, but staff / visitors only in opening hours. (We suggested to West Devon DC three years ago that they could do this for the charger in their Kilworthy Park office, with no result so far.)

Q18/19 Recommendation 3. Plug gaps in private-sector destination and intermediate charging SA

Yes, the Council is best placed to have this overview. Owners of community buildings with car parks – eg village halls, churches – are often small charities run by volunteers and even if recognising the potential benefits of offering charging facilities will need advice and support.

Q20 / 21 Recommendation 4. Follow best practice design principles SA

Agree with the points made here.

Q22 / 23 Leverage private sector funding but retain control through a concessionary approach AA

Seems sensible, but a point not addressed in the strategy is how the Council will ensure that concession holders treat their customers fairly. While drivers charging en route have some flexibility in choosing chargepoint operators, those needing to charge close to home need protection against a monopoly provider raising prices unreasonably, or failing to maintain the facility.

The price of power at chargepoints for residents without off street parking is important, both as a matter of equity, and because there are already reports of the cost per mile of fuel for those unable to charge at home being being higher for EVs than for ICE vehicles. Fear of this is a deterrent to adoption of EVs.

The Council should ensure it acts in an astute and commercially aware way in negotiating concessions that deliver value for money to users, not just profits from the use of publicly funded infrastructure to the operators.

Q24/ 25 Recommendation 6. Seek national funding to support EVCP aspirations SA

Inevitably necessary, and also we think priorities for Devon CC budget should be active travel infrastructure and public transport. However external funding does not detract from the Council's responsibility to use the investment wisely to maximize contribution to the strategy's aims.

Q26/ 27 Recommendation 7. Leverage scale through Devon-wide funding applications and procurement AA

If this is implemented in such a way that West Devon gets a share that is fair in relation to need then a good principle. Important that it doesn't result in a monopoly provider who cannot in practice be held to account for future performance.

Q28 /29 Recommendation 8. Lead on local district co-ordination SA

Yes, County should do this.

Q30 / 31 Recommendation 9. Monitor EV uptake and charge point provision AA

Obviously needed – plus further monitoring, eg usage, equity

WSP data forecasts around 250,000 EVs in Devon in 10 years time (2032). There are currently 6,500 EVs and 314 public EVCPs - giving a ratio of one EV per 20.6 public EVCPs. If a similar ratio were to be suitable to serve the 250k EVs would point to the need for 23,600 public EVCPs in Devon in 10 years' time.

WSP data forecasts for around 176,000 EVs in Devon in 8 years' time (2030). The data provided by WSP points to in the region of 11,800 EVs currently registered in Devon and 614 public EVCPs available - giving a ratio of one EV per 38 public EVCPs in the region. If a similar ratio were to be suitable to serve the 176,000 EVs in 2030 then 4,600 public EVCPs would be required - exactly the number that appears in the mid-range scenario when WSP forecast EV demand. This seems rational at face value, but appears to overlook a key oversight: we are currently at a very early stage in the EV adoption curve and the people who been adopting EVs so far are those to whom the barriers to adoption have been lowest - largely, demographics with access to off-street parking & above average income. Over the next eight years this will change, and an increasing proportion of the 164,000 EVs to arrive in Devon as predicted over the period will not be adopted by those with similar characteristics displayed by those who have adopted EVs so far.

If Devon County Council wish to see 176,000 EVs adopted in the region 2030 then the level of public chargers required should reflect the changing demographic of EV adopters - pro-rata'ing of existing EV:EVCP ratios seems a somewhat conservative approach, if indeed this is what has been adopted by WSP.

Comment given that 'private sector expected to focus on other markets' - should not be simplified to 'private sector will not provide any on-street residential charging'. Companies such as Char.gy run a commercial network of lamp-post based chargers - some of these are subsidised by grants, some are commercially viable grant free. This may be of relevance to DCC in determining where any capital secured should be deployed - DCC should adopt a robust and engaging dialogue with CPOs to promote the rapid deployment of improved residential charging infrastructure in the region that enables a fair and equal access to the transition to electric.

Recommendation 10. Ensure EV design considers diverse user needs SA

Q32/ 33 Inclusive approach taking account of diversity within EV drivers and of others moving around near chargepoints is vital. Taking pavement space away from pedestrians to feed vehicles is unacceptable. Pavements over 2m wide are rare outside the cities, and in the few local places where they are present they have become points where people pause for conversation or rest, or are used for pop up creative events. However placement of build-outs should avoid making cyclists swerve into traffic. Chargepoints are services to cars – so the space sacrifice for them should be taken from cars, eg by building out over a parking space.

Q34/35 Raise public awareness, including of the peer-to-peer charging network SA

Yes. Council should use its strength in public communications for general reassurance that "next car we get should be EV", and to showcase local examples of this working well for families and businesses. We have seen increasing interest from public but still a number of myths around and people unsure where to look for reliable information.

A key enabler of the transition occurring at the scale desired is making all of Devon's EVCPs work harder (public & private). Anything DCC can do to help encourage EVCPs currently stranded in one user type/category to be better utilised by a wider demographic should be encouraged. Promotion of peer to peer networks is a way of keeping spending within the locality.

To give an example… Many local businesses now have EVCPs installed but due to back-office limitations with older hardware, or lack of awareness, these EVCPs are only used overnight when a work(s) vehicle is charging. In the day the EVCP lays empty whilst it could be employed through community charging programmes (e.g. co-charge, Zap-pay, Just Charge, etc) to serve the charging needs of the community. This is a rapidly maturing space with simple, end-to-end solutions appearing en masse on the market. DCC could be well placed to promote clarity to local businesses of the potential here. The same is true of course for householders making their private EVCPs available for community/P2P charging.

As a caveat, some users, eg lone women, may regard use of private locations as too unsafe, and private chargers may not have accessibility features some drivers need.

Q36/37 Rec 12. Work with electricity network companies to improve capacity within the network SA

Some of our members are involved in Devon Community Energy Network, and we are aware that there is considerable work required to ensure that Devon can make the most of its potential to use locally generated renewable energy. We suggest that this part of the strategy should explicitly reference the potential for using locally generated electricity and taking account of community energy networks.

DNOs are keen to engage and key to this is early engagement - dialogue should be opened and developed as soon as possible.

DCC should make sure to understand the implications of the soon to be implemented Access and Forward-Looking Charges Significant Code Review (Ofgem) which will see the cost of network reinforcements for EV charging projects significantly reduced. This may impact on the indicative costs (and thus potentially some of the types & locations of chargers DCC may consider/favour in the future).

Q38/39 EVCP Solution Preference Hierarchy NX

This seems to have shifted the focus from DCC priorities for intervention to the wider issue of where EVs in Devon, including those of tourists and day visitors, are charged. See previous comments for why we agree re first three categories. The practicality of destination versus on street chargepoints will vary considerably with their situation and the locality, so a hierarchy seems simplistic.

Q40 Please add any further comments you have about any of the topics raised in this questionnaire.

In alignment with DCC's mission statement DCC should consider very carefully how to ensure that any EVCP that is delivered is optimised to deliver a fairer, greener and more inclusive future for all. Above all, two key points that present themselves to Transition Tavistock as key in ensuring this are the right chargers in the right place and ensuring just pricing of energy at those chargers. The right charger at the wrong price (too expensive to use) or the right price (affordable, enables transitioning to a BEV) at a charger in the wrong place (cannot practically be integrated into daily life) will stunt the transition and leave BEVs a privilege of a small minority. DCC must be ambitious in maximising

grant funding through schemes such as LEVI and robust in ensuring that negotiations with CPOs ensure that the EVCPs delivered, and cost of energy at these EVCPs, is accessible, fair and inclusive.

The strategy does not cover freight because this will be in a peninsula plan by another body. However this may mean that EV charging by small businesses, mobile workers (including carers, plumbers etc who go to residential properties), self-employed couriers etc does not get covered properly. They typically have high mileage and go some very rural locations, but do not use “freight” vehicles or go to the type of workplace likely to have its own charging facility. We suggest specific work is done within the next 3 years to identify what they need and how to provide it, otherwise this may become a group of drivers who find it very difficult to switch to EVs. Even if there is national research on this, it may be biased to cities, so Devon should ensure that solutions which work in a rural context are found.

Another gap in the strategy is the lack of reference to collaboration with neighbouring authorities. Residents in our area travel to Plymouth and Cornwall for both work and leisure – and vice versa - and for some the nearest “destination” may be over the border.