EVA England

EVA England responds to the ZEV Mandate Consultation

Key Steps to Driving ZEV Demand

EVA England responds to the ZEV Mandate Consultation **Key Steps to Driving EV Demand**

Acknowledgements
Thanks to Nicholas Hall and Florence Lee from Tendo Consulting for their research support and insights.

EVA England
Electric Vehicle Association England

Registered Address:
Southgate Chambers
37-39 Southgate Street
Winchester SO23 9EH

0203 822 0811
info@evaengland.org.uk
evaengland.org.uk

Electric Vehicle Association England
Registered non-profit Community Interest Company (England) no. 12649115

Electric Vehicle Association England
EVA England is a member association representing current and prospective EV drivers in England, and advocating on their behalf to the government, media and industry.

EVA England was founded in 2020 by passionate EV drivers inspired by the benefits of electric driving and concerned by the health and climate impacts of the use of petrol and diesel vehicles.

Our goal is to give a voice to EV drivers in order to push for government policies and industry changes which accelerate the transition to electric vehicles.

Foreword

EVA England is a membership association that represents the voice of the electric vehicle (EV) driver and ensures that it is central to decision-making within Government and across the industry. We are the only organisation in the country solely dedicated to current and future EV drivers' interests, independent of the EV manufacturing and charging sectors. This means that we focus our data gathering and policy formulation on driver perceptions: the appetite for EVs across the driving community; how current EV drivers are responding to improvements in charging and fluctuations in purchasing and charging costs; and where barriers remain, dissuading more drivers from switching to electric. We work closely with our members and partners across the industry in doing this, regularly running driver surveys and member workshops to gather feedback on what aspects of the transition work well for consumers and where improvements still need to be made.

EVA England supports the Government's ambition to phase out the sale of new internal combustion engine cars by 2030, as a necessary and strong signal to the market, but we also recognise that the transition to fully electric vehicles will only happen if drivers choose to buy them. Sales of EVs are increasing at ever higher rates, with over one in five cars sold at the start of this year being fully battery electric, and the supporting infrastructure is keeping pace with demand, with over 73,000 public devices. Existing EV drivers are incredibly positive about their cars and vans, with 91% saying they would not go back to a petrol or diesel vehicle. Recent opinion polls suggest voters are starting to be incredibly positive about EVs as cars for the 'everyday' driver. Meanwhile, Government regulations are ensuring that the charging infrastructure is ever more reliable and easy to use.

However, sales of EVs are still softer than forecast, and not all people see these cars as practical for them. Furthermore, the costs of purchasing and owning these vehicles are increasing – with removal of incentives such as the Plug in Car Grant, Vehicle Excise Duty and Expensive Car Supplement exemptions, and rising public charging costs. There is a risk that unless action is taken to address these concerns, there will be continued public scepticism around the overall benefits of these vehicles, slowing the pace of change. There is also a risk that the consumer is ultimately asked to bear the costs of the transition.

Our work with our members and the wider driving community suggests that the upfront cost of the vehicles, and the cost, availability of and access to charging, persist as key issues presenting a barrier to faster uptake of EVs.

We therefore welcome the opportunity provided by this consultation to put forward ideas for measures to support the driver through the transition to fully electric vehicles. With our focus being on Part 1 of the consultation, and within that, question 8 (on demand measures to support the transition), we set out the key challenges that we believe are slowing the transition to electric driving, the evidence base behind those challenges, and a set of recommendations to tackle them.

Dr Victoria Edmonds
CEO, EVA England

Contents

The consumer's perspective on the market

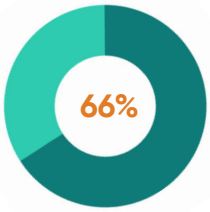
Sales of full battery electric vehicles, which we define in this document as zero-emission vehicles (ZEVs) to bring it in line with definitions used by Government, are increasing at ever higher rates, with over one in five cars sold at the start of this year being a ZEV and over 73,000 public devices in over 37,000 locations. Existing ZEV drivers are incredibly positive about their cars and vans, with 91% saying they would not go back to a petrol or diesel vehicle. And the IPPR's recent public opinion poll suggests the wider driver community are increasingly positive towards ZEVs.

Indeed, EVA England's regular surveys, workshops with its members and discussions across the sector support this overwhelmingly positive direction of travel. However, they also demonstrate that challenges persist in promoting a smooth switch to electric driving.

A recent flash survey of over 450 ZEV, hybrid and petrol and diesel drivers (results summarised below) suggests that upfront cost, availability and access to public charging infrastructure, and concerns about the emerging divide between those who are able to charge on their driveways and those who cannot, persist as major barriers to the transition.

Upfront cost

- **Nearly 6 in 10 ZEV drivers** found purchasing their ZEV more expensive than petrol/diesel.

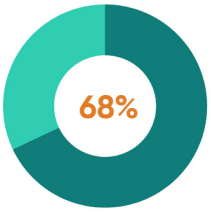


of ZEV drivers identified upfront cost as one of the greatest barriers holding drivers back from switching to a ZEV.

- **Half of respondents** call for the Government to prioritise incentivising cheaper ZEV purchasing costs.

of petrol and hybrid owners selected upfront cost as the main barrier to uptake.

Misinformation

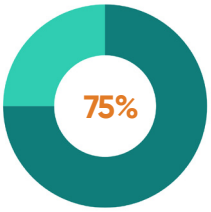


of ZEV drivers identified misinformation as one of the leading barriers holding drivers back from switching to a ZEV

- **55% of respondents** call for the Government to prioritise support for an awareness campaign to counter misinformation.

Addressing the gap between public and private charging

- **44% of ZEV drivers** identified private charging infrastructure (unable to install a private charger, having no access to off-street parking) as one of the greatest barriers holding drivers back from switching to a ZEV



of respondents call for the Government to prioritise addressing high public charging costs.

- **95% of ZEV drivers with off-street parking** have their own ZEV charger, while 32% without off-street parking have their own ZEV charger. Both stats include using a 3 Pin plug.

Among petrol/diesel and hybrid drivers, other leading concerns were also cited as stopping them from switching to a full ZEV, including:

- Availability of public charging points - **41%**
- Charging infrastructure seems difficult to use - **44%**
- Concerns over range - **41%**

Our response to the Government's consultation

EVA England therefore welcomes the opportunity that this consultation provides to offer further insight into the challenges outlined above and proposals for addressing them.

The following recommendations have been formed with, and tested by, our members and partners across the industry, including through our member workshops. They provide a platform from which further analysis, work and discussions can take place.

The need for certainty and clear messaging for the consumer

The previous Government's decision to delay the UK's end of sale of new petrol and diesel cars from 2030 to 2035 led to one in four drivers (24%) delaying their plans, while one in seven (14%) said they would never make the switch[1].

As EVA England, we represent all current and prospective ZEV drivers, including those who have not yet made the transition to fully electric driving. But common to all is the need for certainty and clear messaging on the Government's position on electric vehicles.

Recommendation 1: **Following this consultation, the Government must be clear that the outcome of the consultation, and notably the ZEV mandate targets and the vehicles included within them, are final.**

Demand measures to support the consumer

A summary of our proposals for addressing the specific barriers identified on page 6 and 7, and answering the Government's call for ideas to ease the costs of transition for industry and consumers, is presented in the table below. In the following pages we expand on these proposals and the evidence behind them.

1 SMMT, 2024. Car industry urges 'fair tax for a fair transition' to put EVs back in the fast lane

Summary of EVA England key recommendations

Taxation as a tool to address upfront cost	• Extend the suspension of the **Expensive Car Tax Supplement** for ZEVs. • Encourage greater uptake of **salary sacrifice** through making it a condition of receipt of Government chargepoint grants, and mandating all large and medium companies to offer a scheme that allows access to new and used ZEVs. • Give industry and consumers sight of future **Benefit-in-Kind** rates during the transition period. • Halve **VAT on new ZEVs** for three years.
Enhanced support for a lower cost ZEV market, including a stronger used ZEV market	• Consider a **social leasing, zero-interest loan or residual guarantee scheme** to support lower-income households access lower cost ZEVs, using the **National Wealth Fund or British Business Bank** as platforms for the scheme. This could be coupled with a targeted vehicle scrappage scheme. • Produce a timetable for translation and **application of the UNECE battery standard** in the UK. • Provide interim guidance to consumers and businesses on measuring **battery health.** • Consider including measurements of **battery health** as part of a vehicle's MOT.
Tackling the charging divide	• Reduce **VAT on public charging points** in line with the 5% rate on domestic electricity supply. • Promote greater uptake of **cross-pavement technologies** by simplifying the application and consent process for installers and local authorities; increasing the size of the grant available for consumers from £350 to £700; and updating guidance to encourage the development and uptake of all types of cross-pavement technologies. • Restructure and extend the **workplace charging scheme** to make it available to a greater number of state- funded institutions and more affordable for small and medium sized companies.
Improving access to charging	• Develop an **interim minimum standard through PAS 1899** that can be implemented within the next year and is a condition of receipt of Government chargepoint grants, and create a timeline for development of a final standard that ensures all chargepoints are fully accessible to all users. Designate a decision point within that timetable to move to mandate this standard should implementation by chargepoint operators on a voluntary basis be insufficient. • Move to legislate to grant **tenants an automatic right to install a charge point** in dwellings with off-street parking. • Publish a strategy to set out plans to remove barriers to rolling out **ZEV signage** and include provision of adequate signage as a condition for receipt of its chargepoint funds through LEVI and the RCF. • Monitor and report on the **provision of roaming facilities** across the industry and consider further steps to simplify the payment process for consumers for chargepoints under 8kW.

Taxation as a tool to tackle upfront costs

ZEVs are still more expensive than their internal combustion engine (ICE) counterparts, with a recommended retail price (RRP) that is currently on average 24% higher than that of ICE vehicles (and 35% just a year ago)[2].

There are a number of taxation measures available to the Government to address the high upfront cost of ZEVs and tackle one of the biggest barriers to greater uptake of these vehicles.

Extending the suspension of the Expensive Car Supplement for ZEVs

Given the higher RRP for ZEVs, an **Expensive Car Supplement** (ECS) threshold of £40,000, equivalent to the threshold for ICE vehicles, is not appropriate for ZEVs. It will capture a larger proportion of the ZEV market than it does the ICE market, and drivers present at our member workshops felt that its introduction from this April is a tax burden on future and current ZEV drivers that needs resolving. Anecdotes from EVA England members suggest that this disproportionate taxation on ZEVs could prevent them from purchasing or leasing another ZEV.

Recent Treasury statements relating to ECS indicate it is aware of its disproportionate impact on EVs and that it "will consider raising the threshold for zero-emission cars only at a future fiscal event".

Recommendation 2:

There should be an immediate change to ECS application on ZEVs, with the following options proposed for consideration:

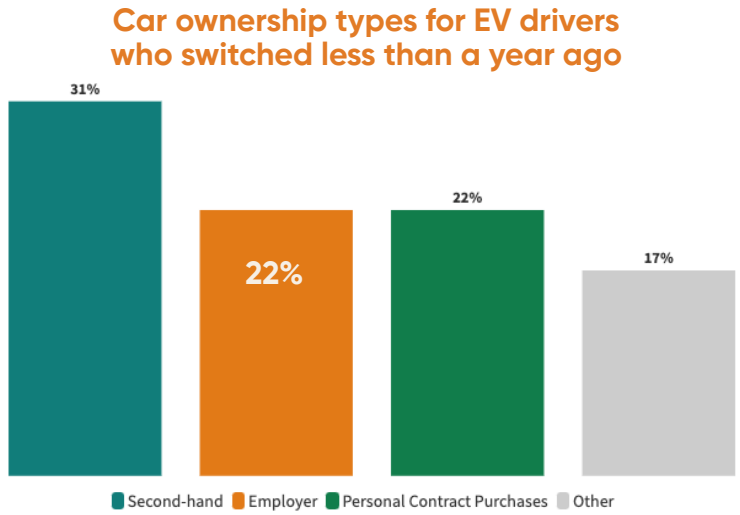
- **Extending the suspension of ECS for ZEVs beyond April 2025, for a period of at least three years.**
- **Establishing a separate ECS threshold for ZEVs of £60,000, which would reflect the higher RRP for ZEVs and, we estimate, bring an equivalent number of ZEV products to ICE products under the ECS threshold.**
- **Establishing a graduated ECS threshold for ZEVs, similar to that for Benefit-in-Kind, where ECS is suspended for ZEVs for a period of three years and then gradually introduced at declining levels until it is equivalent to that**

2 Autotrader, 2025. Road to 2030

for ICE vehicles at the point at which true price parity is achieved between ZEV and their ICE counterparts.

Salary Sacrifice

Salary Sacrifice schemes and Benefit-in-Kind (BiK) tax incentives were the second most popular source of ownership among newer ZEV drivers after second-hand purchases, according to EVA England's September 2024 survey[3].



The BVRLA January 2025 leasing outlook report[4] highlights the significant growth in salary sacrifice schemes, with a 51% increase year-on-year, and found that demand is particularly high when EVs are priced below £300 per month. During our most recent EVA member workshop, 57% of participants selected ZEV salary sacrifice schemes among their top three asks of the Government to address high upfront costs. However, only 25% of respondents to our surveys currently have access to such a scheme at their workplace.

In our recent flash driver survey, we asked ZEV drivers how they perceived the upfront cost of their ZEV compared to petrol or diesel. A number of respondents commented that their ZEV was affordable thanks to an employer-led scheme:

"Company car cheaper as EV"
"Motability low deposit"
"Via work scheme fairly affordable"

Whilst verified statistics are hard to come by, anecdotal data suggests that uptake across smaller and medium-sized companies together (which could represent around 60% of

3 EVA England, 2024. The Great EV Charging Report 2024
4 BVRLA, 2025. Leasing Outlook

jobs) is only around 41%, compared to around 85% for larger companies. Anecdotal evidence also suggests that small and medium companies are either not aware of salary sacrifice, or that the business case whereby it is often offered for new cars only makes it unaffordable for them.

Recommendation 3: **The Government should encourage greater uptake of salary sacrifice by:**

- **Making the offer of salary sacrifice across the new and second-hand car and van market a condition of successful receipt of Government chargepoint grants and funds, notably the Workplace Charging Scheme and, where appropriate, funds from the Local Electric Vehicle Infrastructure (LEVI) and Rapid Charging Fund (RCF) schemes.**

- **Mandating salary sacrifice schemes that offer options across the new and second-hand car and van market for all medium to large businesses with over 50 employees.** This would grant over 50% of all employees in the UK (14.2 million people) an automatic right to access a ZEV-focused salary sacrifice scheme[5] at an affordable cost.

Benefit-in-Kind (BiK)

Benefit-in-Kind (BiK) has been one of the main drivers behind ZEV uptake since low rates were introduced in 2020/2021. A 2022 survey found that 90% of ZEV drivers were at least partly influenced by BiK rates in their decision to purchase a ZEV[6]. Certainty over future rates is key to consumer confidence in the economics of their ZEV purchasing decisions.

Recommendation 4: **The Government should give industry and consumers sight of future Benefit-in-Kind rates during the transition period from 2030 to 2035.**

Value Added Tax (VAT)

A cut to the VAT on ZEVs is the single most effective measure that would lower upfront costs of the vehicles and encourage drivers to switch to electric. SMMT analysis has previously shown that almost four in 10 drivers (37%) interested in going electric said a VAT cut would accelerate their plans, and that halving VAT on new ZEVs for three years would put more

5 Department for Business and Trade, 2023. Business population estimates for the UK and regions 2023: statistical release
6 BVRLA, 2023. See the Benefit. Company Car Tax/Salary Sacrifice Tax Briefing

than a quarter of a million ZEVs on the road above current expectations. However, this would only be acceptable to drivers if there is a parallel commitment that the cost savings will be passed on to the consumer.

Recommendation 5: **The Government should halve VAT on new EVs for three years, subject to a formal commitment from the industry that the subsequent cost savings will be passed on to the consumer.**

Enhanced support for a lower cost ZEV market, including a strong used ZEV market

EVA England's 2023 survey found that the most represented income bracket among ZEV drivers was £50,000–£75,000. And whilst the 2024 iteration of the survey saw increased representation among the next income bracket down, only 6% of respondents reported an income of £25,000 or less[7]. Given that the upfront cost of ZEVs remains higher than their ICE counterparts, there is a continued risk that lower-income households are excluded from the transition to zero emission vehicles.

Use of existing financial structures to deliver a social leasing scheme, residual value guarantee scheme or interest free loan scheme for lower cost ZEVs

Drivers taking part in EVA England's workshops – and evidence from schemes delivered elsewhere and targeted at promoting access to lower cost ZEVs – have identified that access to a lower cost and stronger used ZEV market could have a significant impact in accelerating ZEV uptake rates.

What could a targeted access scheme look like?

The French model

The French Government launched a highly targeted social leasing scheme that became operational in January 2024 and oversubscribed in its opening six weeks. Only households earning under €16,000 per year and with a commute of more than 15km were eligible, and a total 50,000 applicants were approved for Government-backed leasing contracts of between €100–€150. The scheme has been renewed for 2025. It has the added benefit of promoting local EV manufacturing given the scheme's design pushing eligible applicants towards European models.

The Scottish model

In 2011, the Scottish Government introduced the Low Carbon Transport Loan, providing interest-free loans of up to £35,000 to cover the cost of purchasing an EV and £10,000 for a new electric motorbike or scooter. The loan had to be repaid over six years. In 2018/19, 12% of new ZEV sales were linked to the scheme. The scheme was phased out for new EVs in 2020, replaced by loans for used EVs up to the value of £30,000.

7 EVA England, 2024. The Great EV Charging Report 2024

A Residual Value (RV) guarantee scheme for used EVs
ZEVs have a more volatile depreciation over the lifetime of the vehicle than their counterpart ICE vehicles, and their subsequent uncertain residual values increase the risk of loss for those selling on the vehicles, pushing up leasing costs and impacting re-sale values for private buyers. An RV guarantee scheme could be structured so that the Government takes a proportion of the RV risk, up to a maximum value (e.g. if a vehicle is expected to resell for £10,000, and the value falls below that, the Government would agree to pay a portion of that lost value).

How could such schemes be funded?
There are existing financial funds and structures within the Government, including the £27.8bn National Wealth Fund, and the British Business Bank, which could provide the platform for the development of similar schemes in the UK.

Recommendation 6: **The Government should:**

- **Consider the development of a leasing, loan or residual guarantee measure within the UK that supports lower-income households in the purchase of electric vehicles. If structured appropriately, such a scheme could also promote the growth of a strong used ZEV market and a stronger UK-based ZEV manufacturing industry.**

- **Make use of the existing platforms provided by the National Wealth Fund and British Business Bank, to promote these schemes, and consider coupling with a targeted vehicle scrappage scheme that provides the additional environmental benefit of taking older, more polluting cars off the road.**

Battery health certification

Although ZEV batteries typically lose about 2% of their health each year on average —similar to the performance degradation of petrol or diesel vehicles— battery life remains a major concern for potential ZEV buyers[8]. 41% of respondents in EVA England's survey cited concerns about battery range as one of the factors holding them back from making the switch to a ZEV.

Battery safety and health are also key factors driving high insurance premiums for EVs. The battery is the most expensive component of the EV, and there is, to date, insufficient data

8 BVRLA, 2025. Happy EV After campaign

on how it performs following collisions and on the subsequent repair costs, pushing up insurance premiums for EVs. 10% of respondents to our survey identified insurance costs as a key barrier to purchase of an EV.

Work by the Green Finance Institute showed that Battery Health Certificates or Battery Value Guarantees Battery Health Certificates (a standardised battery health certification scheme for used vehicles) could encourage around 31% of ZEV drivers to buy a used EV[9]. There is work going on to develop a battery standard through the UNECE, and organisations such as the Global Battery Alliance are working to put together a battery passport system that provides information on the health of a battery as it is passed on throughout its useful lifetime. But consumers are often not aware of this work, or how and when it will translate and be applied in the UK, and there is significant consumer demand for products that will test battery health now.

Recommendation 7: **The Government should:**

- **Provide clarity to consumers and businesses on the timetable for translation and application of the UNECE battery standard in the UK.**
- **Provide interim guidance on measuring battery health to ensure that emerging market products designed to test this are providing valid and safe checks for consumers.**
- **Consider including measurement of battery health as part of a vehicle's MOT.**

9 Green Finance Institute, 2024. The Used EV market: the key to unlocking net zero

Tackling the 'charging divide'

Charging costs at public charging points are considerably higher compared to private charging and vary enormously depending on the type of charging point. Overall, the average cost from home charging is 32p per kWh and 48p per kWh for public charging, but home charging can cost as little as 7p per kWh and public charging currently as much as 85p per kWh[10].

This substantial difference in costs generates an inequitable charging divide, where those households with a driveway are able to benefit from the potential for EVs to be cheaper to run than their ICE counterparts, and those without a driveway paying more to run their ZEV than their old ICE car[11].

According to EVA England's September 2024 survey, 12% of ZEV drivers are already solely using public charging points to meet their charging needs[12]. These figures are only set to increase as we move closer towards mass uptake, and the proportion of ZEV drivers without access to off-street parking increases.

Unless this charging divide is addressed, there is a substantial risk that certain groups of consumers will bear a disproportionate cost of the transition to ZEVs. Transparency over how the costs of public charging stack up and the levers which industry and Government can pull to reduce those costs is paramount, as is acknowledging that, because on-street charging will likely never reach full price parity with off-street charging, more needs to be done to encourage technologies that will allow residents to link their vehicles to their home energy tariffs.

Respondents, 2025 EVA England Flash Survey
When asked about their overall driving experience, respondents stressed how expensive public charging is compared to private:

"Without access to at-home charging, EVs are more expensive to run than petrol cars due to extortionate public charger pricing. This creates a two-tier world, those with private charging vs those without."

10 Podpoint, 2024. Cost of charging an electric car
11 Which?, 2025. How much does it cost to charge an electric car?
12 EVA England, 2024. The Great EV Charging Report 2024

"I can charge at home. If I could not do that I would probably not have an EV. Public chargers - even slow ones - are many times more expensive than the overnight off peak electricity from a domestic supply."

There are some clear steps that the Government can take in the immediate term.

Reduce VAT on public charging

Value Added Tax (VAT) is currently charged at the full 20% rate on all public ZEV charging points in the UK. This is in contrast to ZEV charging using domestic electricity supply, which is charged at a lower 5% VAT rate[13].

Recommendation 8:

The Government should reduce the VAT on public charging points under 22kW to bring it in line with the 5% rate on domestic electricity supply. However, this must be coupled with formal commitments from the chargepoint industry that the subsequent cost savings will be passed on to the consumer.

Promotion of technologies that allow access to home energy tariffs

EVA England welcomes the steps the Government has taken to support access to **cross-pavements solutions** that allow ZEV drivers without a driveway to plug in to their home supply, including provision of a specific grant towards the costs of installation, and updated guidance to local authorities and chargepoint operators on the application and installation process.

However, there is mounting anecdotal evidence that despite this, the process for the resident is opaque, too lengthy, and costly. Some consumers are waiting around twelve months for approval to install the technology and can pay up to between £2,000 and £3,000 in costs.

Access to home energy tariffs will be key to tackling the current inequity in charging costs between those who have access to off-street parking and those who do not. Promoting better access to all technologies with the potential to provide this, be they gullies, gantries or new innovations, is critical.

13 SMMT, 2024. New car market powers up as industry calls for VAT cut on EV public charging

Respondents, 2025 EVA England Flash Survey

When asked about their overall driving experience, respondents commented how councils need to be more informed about the charging solutions on offer:

"Councils need to be instructed to adopt the many solutions available for residents without driveways or private parking – e.g.: pavement gulleys, free overnight access to local carparks for charging, etc."

"Some councils have embraced on-street charging solutions, where appropriate. This is an ideal solution for many, but not all councils are on board with this. Councils must allow these solutions, except where it can be clearly shown to be inappropriate. A list of councils that are participating should be easily available to potential EV purchasers."

One EVA England member, resident in North London, commented:

Cross-pavement charging should be required as part of the Government's refreshed EV strategy. For instance, if Local Authorities wish to receive grant funding for public charging then they should be required to allow cross-pavement charging by adopting a 'model policy' that has been developed by one of the Local Authorities that allow this solution.

Everyone should have the freedom to charge electric vehicles at affordable prices and the opportunity to help use their EV battery to balance the power grid."

Recommendation 9:

The Government should:

- **Take steps to simplify the application process for residents and the permitting process for installers of cross-pavement technologies, including consideration of standard application forms and standard licence agreements for solutions, so they can be swiftly adopted by all local authorities, rather than being drafted from scratch on a local authority by local authority basis.**

- **Increase the size of the grant available to consumers from £350 to £700, in line with the early days of the Electric Vehicle Homecharge Scheme, to reflect updated data on the actual costs to the consumer of installing cross-pavement solutions.**

- **Update its guidance to encourage the development and uptake of all types of cross-pavement technologies, and**

other innovative technologies that allow ZEV drivers to remotely access their home energy tariffs.

Increase access to workplace charging

Among drivers surveyed by EVA England in our 2025 flash survey, 35% of those who do not have access to a private driveway indicated they would make regular use of workplace charging if their employer had such facilities installed.

Anecdotal evidence suggests the costs of installing multiple chargepoints are still unaffordable for many small and medium-sized companies, despite provision of grants through the Government's Workplace Charging Scheme. The success of the Government's grant scheme for state-funded educational institutions demonstrates that the demand for employee charging, and the willingness for employers to meet that demand, is there when the right funding structures are available.

An EVA England member:

"My workplace also offered free EV charging and free parking for EVs in local council car parks, so that was another incentive."

Recommendation 10:

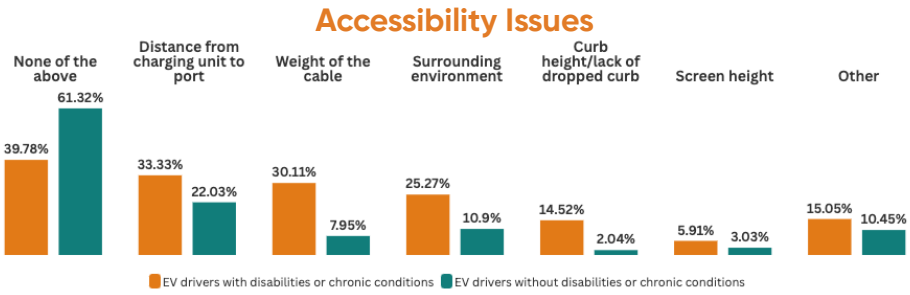
The Government should review the structure of the workplace charging scheme and:

- **Extend its provision for state-funded institutions to a wider set, including NHS sites, state-sponsored leisure facilities and park and recreation grounds.**
- **Consider a restructuring of the funds available to businesses to provide an upfront grant coupled with a guarantee mechanism that allows businesses to pay back the full costs of installation over a longer period.**

Improving access to charging

Availability of charging infrastructure, and a perception that it is too difficult to use, are still prevailing concerns amongst drivers who have not yet made the switch to electric.

Of drivers surveyed in 2024 by EVA England[14], 60% of respondents who identified as having a disability reported encountering at least one issue when using a public charger:



A clear timetable and process for delivery of PAS 1899

The **PAS 1899 guidelines**, produced by the British Standards Institution and co-sponsored by the Motability Foundation and the Office for Zero Emission Vehicles (OZEV), provide minimum specifications for common accessibility concerns, such as the placement of a charge point display, minimum bay size, and the height and weight of the charging cable.

However, whilst the accessibility of public charging points has generally improved, anecdotal evidence suggests that no single charging point has yet met all of the PAS 1899 requirements. Evidence from the industry suggests this is largely due to an insufficient supply of the required components. However, as chargepoints are being installed at an ever-increasing pace, it is paramount that people with disabilities are able to operate these new chargepoints.

Respondent, EVA England Flash Survey

When a respondent who owned a hybrid was asked why they did not choose a ZEV, they said it was due to accessibility issues, specifically with public charge points:

"Accessible charging is difficult. No space between bays, trip hazards, gravel around charger, chargers in areas that don't feel safe, fight in a charging queue. Final straw was injuring myself trying to connect a heavy and rigid charging cable leaving me in a lot of pain requiring cancelling the holiday we were going on, hospital treatment and months of restricted movement during recovery."

14 EVA England, 2024. The Great EV Charging Report 2024

Recommendation 11: **The Government should:**

- **Require the development of an interim minimum standard, through PAS 1899, that can be implemented within the next year and included as a condition of receipt of Government chargepoint grants, so that by the end of March 2026, all new chargepoints being rolled out can meet this minimum standard.**
- **Set out a timetable for the development and implementation of a final standard that will ensure chargepoints can meet the needs of all users with disabilities.**
- **Designate a decision point within that timetable whereby it will move to mandate the standard if it is not being implemented on a voluntary basis by all chargepoint manufacturers and providers.**

Providing UK Tenants with a Right to Charge

There are 8.6 million households in rented accommodation in the UK, yet tenants have no guarantee of having permission to install a charger in their home. EVA England hears too many anecdotes of tenants being refused permission to install a chargepoint by their landlords.

This barrier is exacerbated for the 10-15% of households living in multi-unit dwellings with shared parking. The Government has mandated that new build and major renovation projects involving properties with existing parking spaces provide ZEV charging points for residents. However, regulations for existing residential dwellings, and particularly multi-unit dwellings, are less concrete, and the UK is falling behind its European counterparts in providing tenants with a right to charge[15].

Recommendation 12: **The Government should move to legislate to grant tenants an automatic right to install a chargepoint in dwellings with off-street parking and legislate for a minimum number of chargepoints per number of spaces to be installed in car parks for multi-unit dwellings.**

15 Transport and Energy, 2025. Right to Plug

Signage

According to Instavolt, despite there being over 73,000 electric vehicle charging points across over 37,000 locations, only 25 motorway locations have official road signs to indicate their presence[16]. There is evidence that current Government guidelines are presenting a barrier to greater rollout of chargepoint signage, restricting their location and forcing competition for space with other required signage. While ZEV drivers typically rely on apps to locate public chargers, road signs are essential to raising awareness among non-ZEV drivers, helping to highlight the growing availability of ZEV charging points in a way that is comparable to petrol and diesel re-fuelling signs.

An EVA England member:

"Lack of signage in car parks can be an issue. When entering a service station, passengers are normally on 'spot the charger' duty!"

Recommendation 13:

The Government should:

- **Publish a strategy setting out plans for removing barriers to rolling out ZEV signage at chargepoint locations across the UK;**
- **Include provision of adequate signage as a condition for receipt of its chargepoint funds through LEVI and the RCF.**

Payment systems for chargepoints below 8 kW

The Public Chargepoint Regulations 2023 require that CPOs must offer roaming at all their public charge points by connecting to at least one third-party roaming provider, to allow consumers to pay for their charging using a single app or RFID card.

Anecdotes from consumers and the outputs from EVA England's workshops suggest that many drivers still need to download multiple apps or use multiple RFID cards to access chargepoints below 8kW. Drivers cite Transport Scotland's Chargeplace RFID card as a best practice example whereby they can access any chargepoint in Scotland with a single card, and are calling for a similar scheme across the UK, or for all chargepoints to have a contactless function.

16 The Times, 2025. Why you never see road signs for EV charge points

Marie H., EVA England member:

"With more chargers came more confusion, especially with the different providers and payment methods. It has improved with most of them accepting contactless now, but there's still a myriad of apps to contend with if you want to try and find the best deals."

Recommendation 14:

The Government should monitor and report on the provision of roaming facilities across the industry, and set out further steps for ensuring access to chargepoints below 8kW using a single payment card, including consideration of contactless payments for these chargepoints.

EVA England

Electric Vehicle Association England

Registered Address:
Southgate Chambers
37-39 Southgate Street
Winchester SO23 9EH

0203 822 0811
info@evaengland.org.uk
evaengland.org.uk

Electric Vehicle Association England
Registered non-profit Community Interest Company (England) no. 12649115