

# Consultation response: Future of Transport Regulatory Review Zero Emission Vehicles

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British Vehicle Rental and Leasing Association (BVRLA) members represent the demand-side of the automotive industry, buying around 50% of new vehicles, including over 80% of those manufactured and sold in the UK. In doing so, they support almost 500,000 jobs, add £7.6bn in tax revenues and contribute £49bn to the UK economy each year.

BVRLA members recognise they have a crucial role to play in supporting the decarbonisation of road transport. Chargepoint provision and the consumer experience of using electric vehicle charging are critical factors in driving decarbonisation. We welcome the focus of this consultation and are grateful for the opportunity to provide our thoughts on the areas where Government intervention may be required.

## Summary of BVRLA view

### **Statutory obligation to plan for and provide charging infrastructure**

The BVRLA agrees with the power being sought, which would place a duty on local authorities to plan for chargepoint provision. It is imperative that this is supported by central leadership and a national framework that ensures consistency across the country. The national framework must also promote best practice, particularly in relation to how local authorities engage with fleets to understand their needs.

### **Requirements to install chargepoints in non-residential car parks**

The BVRLA is opposed to the Government seeking a power which would apply to all non-residential buildings. A blanket policy could lead to chargepoints that are under-utilised as they are not fit for purpose. A more nuanced policy approach is required to ensure that firms are putting in chargepoints that are needed and will not become expensive white elephants.

### **New powers to support the delivery of the Rapid Charging Fund**

The BVRLA is supportive of a power that encourages greater competition at Motorway Service Areas and at major A roads if this leads to a better consumer experience. Any mandate that progressively increases the number of chargepoints needs to be developed in close collaboration with the operators to ensure that targets are realistic and that devices continue to meet the needs of consumers.

### **Requirements to improve the experience for electric vehicle consumers**

The BVRLA supports Government seeking the power to ensure consumers are protected and that they have adequate rights to redress when things go wrong when charging their vehicle. Having an independent body which can investigate where responsibility lies and take remedial action will provide much needed consumer confidence. It is also imperative that chargepoints are accessible to all users and people feel safe when using them. The BVRLA would support a mandate which ensures disabled motorists and van operators' accessibility needs are met.

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#### **British Vehicle Rental and Leasing Association**

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## **Statutory obligation to plan for and provide charging infrastructure**

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The BVRLA agrees that placing a statutory duty on local authorities will ensure better alignment between local transport planning and chargepoint rollout. The best charging outcomes will require local knowledge to meet the needs of residents, businesses and visitors. However, the BVRLA has concerns over how local authorities will meet the needs of fleet users and whether they will have the resource and specialist knowledge that will be required to fulfil this duty. The disparity in resources and skills amongst local authorities has already led to inconsistencies in chargepoint provision across the country. This has an impact on people's desire to switch to an electric vehicle and can present significant challenges for those who have made the change when they travel to areas without adequate provision of chargepoints.

We believe that placing a statutory duty on local authorities cannot be done in isolation. It must be accompanied by a national framework which ensures consistency across the country and that best practice is shared. Members have raised concern about how local authorities will engage with fleet operators and users to understand their needs. Fleet usage is extremely broad and infrastructure requirements will also differ tremendously from one use case to the next. It is essential that local authorities get sight of research and modelling work that is being undertaken to inform the type of charging that is needed and where this will be best placed. Best practise must also help local authorities understand how to best meet the needs of those who may not reside in the area but travel through it.

Local authorities will need to work with local businesses to ensure private charging also plays a role and that firms are incentivised to develop charging infrastructure which serves their needs and could be opened up for public use. This would include helping local authorities and businesses identify where there may be funding to support this.

## **Requirements to install chargepoints in non-residential car parks**

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Whilst we can see the benefits of requiring landowners to provide chargepoints and charging infrastructure at some non-residential car parks, for example those that are publicly accessible, we are not convinced that this power should apply to all non-residential car parks, particularly where there is restricted access to the public.

Government should not focus on the quantity of chargepoints installed but on the quality. The types of journey and usage of electric vehicles vary massively and their charging requirements will differ. Having a blanket requirement makes it very difficult to ensure that all users' needs are met and that there is the right type of chargepoint available in the areas where it is most needed.

Several BVRLA members will have non-residential car parks where a proportion of the car park is used to hold vehicles. These areas will not be accessible to the general public or to the majority of staff. The requirement to install chargepoints in these locations would not have any benefit to the general public or to the business's electrification. It would force the business to put chargepoints and infrastructure in places where it is not needed. Our members are working hard to meet customer demand and increasing the proportion of electric vehicles on their fleets in line, or in many cases ahead of, the phase out dates. It is imperative that they can install charging infrastructure where it is best suited to their business operations.

An added complication is that a large number of BVRLA members' sites are leased as opposed to owned. There are several unanswered questions about where the costs of this requirement would fall and the impact that this will have on tenants. We have already heard of several cases where a tenant has left a property and been instructed to remove all the chargepoints and cabling that they had installed. There are other use cases, such as rental operators at airports, where there are significant issues around charging infrastructure deployment and responsibility that have not yet had sufficient focus in terms of strategy or fiscal support. These areas will require further support before they can be resolved and charging rolled out.

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If this power were granted and a blanket policy introduced to all non-residential car parks there is a real risk that this could become a tick-box exercise. Instead of having chargepoints that will support the uptake of electric vehicles we could see unwanted, unmaintained and underutilised devices. This would certainly be the case if the power was not supported by detailed guidance setting out responsibilities, duties and best practise.

Guidance would need to cover who would be responsible for maintaining chargepoints once installed, help the landowner determine what power of chargepoint would be best suited and set out how chargepoints must meet accessibility requirements of disabled motorists or van drivers.

The impact assessment that was conducted in 2019 now seems very outdated. We have seen rapid deployment of charging infrastructure with much better provision than just a few years ago. We now also have the 2030 phase out target with many businesses considering how they can meet this target and looking to install charging infrastructure in line with their broader fleet strategy. The initial impact assessment also only looked at certain types of non-residential car parks. We would recommend that the impact assessment is updated to assess whether there is a need for this power to exist for non-residential car parks that are not accessible to the general public.

## **New powers to support the delivery of the Rapid Charging Fund**

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The BVRLA can see the value of having greater competition at chargepoints at Motorway Service Areas and Major A roads. Any competition that leads to better outcomes for the consumer, for example around accessibility, reliability, transparency and ease of payment is welcome. Any opening up of the MSA and Major A road market should be managed to ensure these outcomes are achieved.

Mandating an increasing minimum number of chargepoints, while appealing, needs to be done in close collaboration with the operators to ensure that there are realistic targets and that the devices provided meet consumer needs.

## **Requirements to improve the experience for electric vehicle consumers**

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### **Consumer protection**

With a growing number of players involved in chargepoint provision it is imperative that there is an independent body which can investigate the cause for complaint when things go wrong and where appropriate, ensure that those responsible are held to account and that the consumer can seek redress.

The independent body could be tasked with providing a market monitoring function which would identify and resolve emerging areas of concern. For example, intervention around fair and proportionate pricing. This would be an area which a market monitoring function could identify and quickly step in to resolve.

Such a body could also be responsible for ensuring adherence to standards covering the reliability, accessibility and speed of chargepoints. Where there is non-adherence to these standards, sanctions such as fines, should be introduced. This would improve the customer experience by driving standards up and would ensure a minimum level of service across the various operators.

A dispute resolution service which can help customers resolve common issues such as duplicate payments or billing and could take action against persistent offenders may also be worthy of consideration.

### **Accessible, inclusively designed chargepoints**

We very much welcome the Government addressing areas of concern such as accessibility, appropriate signage and personal safety at chargepoints.

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Finding chargepoints at locations is a persistent problem raised by members and their customers. Having a standardised design that helps people firstly locate the chargepoint and secondly know if it is a slow, fast or rapid device would be very helpful. It could also help disabled motorists or van drivers easily identify where there are accessible chargepoints.

Safety at chargepoints is of paramount importance - they are often located in very remote areas or at the far end of car parks where there is little, if any, lighting and no means for people to call for help. This is problematic for disabled motorists but can also be extremely intimidating, especially when the charging cable is attached and there is no means of a quick escape. There would be significant benefit in ensuring there is more adequate lighting but also ensuring that isolated chargepoints have monitored CCTV cameras.

Both public and private operators should be required to uphold common standards that ensure appropriate provision of chargepoints suitable for disabled drivers. Public operators should also have to ensure accessibility for vans who risk exclusion from the public network given challenges with the size of charging bays, cable length and limited turning room. However, wider design standards are not required to apply to the private network, although this should be open to review.

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## About the BVRLA

The BVRLA represents over 970 companies engaged in vehicle rental, leasing and fleet management. Our membership is responsible for a combined fleet of four million cars, vans and trucks – one-in-ten of all vehicles on UK roads.

BVRLA members represent the demand-side of the automotive industry, buying around 50% of new vehicles, including over 80% of those manufactured and sold in the UK. In doing so, they support almost 500,000 jobs, add £7.6bn in tax revenues and contribute £49bn to the UK economy each year.

Together with our members, the association works with policymakers, public sector agencies, regulators, and other key stakeholders to ensure that road transport delivers environmental, social and economic benefits to everyone. BVRLA members are leading the charge to decarbonise road transport and are set to register 400,000 new battery electric cars and vans per year by 2025.

BVRLA membership provides customers with the reassurance that the company they are dealing with adheres to the highest standards of professionalism and fairness.

The association achieves this by reinforcing industry standards and regulatory compliance via its mandatory Codes of Conduct, inspection regime, government-approved Alternative Dispute Resolution service and an extensive range of learning and development programmes.

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