

Evidence submission to Public Committee for the Planning and Infrastructure Bill 2025
Motability Foundation, EVA England, New Automotive, REA
April 2025

This submission outlines the case to amend the Planning and Infrastructure Bill to provide essential provisions to give electric vehicle (EV) drivers with disabilities the right to access public charging infrastructure that meets minimum accessibility standards.

Summary

A 2024 survey by Vauxhall has estimated just 2.3% of EV public charging points in the UK are deemed appropriate for use by EV drivers with disabilities. This is due, in part, to the fact there are no mandated requirements for new charging infrastructure being installed. Anecdotal evidence collected by EVA England suggests that lack of accessible charging infrastructure is preventing users with disabilities from switching to electric, and in some instances, forcing existing electric car users to turn back to petrol or diesel cars. **By 2035, 1.35 million drivers with disabilities are expected to be partially or wholly reliant on the public charging network. This means that without such requirements, many of these drivers will not be able to charge their vehicle safely or reliably, and may not be able to choose electric.**

This is an especially timely issue given the Government's current push to accelerate the rollout of national charging infrastructure: with a new charger being installed every 29 minutes, failure to enforce minimum accessibility standards now means more complex and costlier changes to existing infrastructure in the future, as the scale of unsuitable charging infrastructure becomes more apparent.

The British Standards Institution guidance on accessible charging (PAS 1899), introduced in 2022, provides good practice guidance for making chargepoints accessible, but these standards are not currently mandatory for charge point operators (CPOs). **Not a single chargepoint installed since the guidance was put in place is compliant with the standard.** Government is currently working with industry and disability groups to review the standard, but has not yet announced any timescale nor plans for roll out of the standard, reviewing compliance with the current or revised standard, or taking powers to make the standard mandatory if needed.

The Planning and Infrastructure Bill presents a unique opportunity to guarantee future public charging infrastructure meets minimum accessibility requirements. The amendments proposed in this submission, outlined in full below, would provide the following intended benefits:

1. Definitive Government powers to progressively enforce the mandating of the accessibility requirements contained within the PAS 1899 standard.
2. Granting relevant public authorities the necessary powers to monitor compliance with this standard.
3. Require charging point operators to gather and regularly report data on the compatibility of individual charge points with key accessibility benchmarks such as bay size, cable weight and display height.

The following document outlines the policy background and its underlying evidence from expert bodies and drivers for the proposed amendments, as well as suggested wording and placement for the amendments themselves.

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1. The issue: PAS 1899 standard and current accessibility concerns

The BSI 1899 standard was published in October 2022, co-developed by the Motability Foundation and the UK Government, and hosted by the British Standards Institution (BSI). Its aim was to provide a workable, minimum standard by which charge point operators (CPOs) can ensure EV drivers with accessibility needs are able to reliably and safely use public charging infrastructure, addressing common accessibility concerns such as placement of a charge point, minimum bay size, and the height and weight of the charging cable.

Anecdotal evidence from The Motability Foundation has found that, overall, the accessibility of public charging points has improved, but that no single charging point has yet met all PAS 1899 requirements allowing them to be granted this minimum certification. As chargepoints are being installed at an ever-increasing pace, it is paramount that people with disabilities are able to access and operate these new charge points.

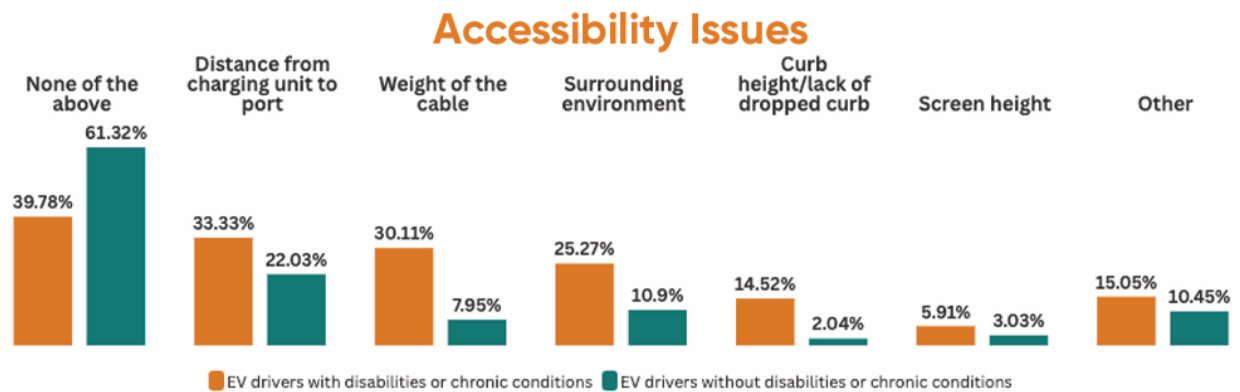
One of the primary challenges to adopting PAS 1899 is the difficulty many Charge Point Operators (CPOs) face in meeting its minimum requirements due to hardware limitations and global supply chain dependencies. Most CPOs do not produce their own charging equipment and must rely on international suppliers, which makes it challenging to meet standards related to equipment design, such as screen height, cable weight, and kerb access. These technical and logistical barriers often lead operators to forgo PAS 1899 assessments entirely.

Additionally, many stakeholders - including CPOs and local authorities - struggle with understanding and correctly interpreting PAS 1899, sometimes viewed as the ultimate standard rather than the baseline. There is also a lack of clarity regarding who holds ultimate responsibility for compliance, given that multiple parties (for example landlords, local councils, manufacturers, and installers) play roles in the deployment and operation of chargepoints. This fragmented accountability leads to confusion and inconsistent implementation.

Consistent data is also an ongoing concern given the current lack of reporting duties on accessibility for CPOs. Crucial accessibility data for disabled users remains unavailable, hindering informed decision-making. To address this, government intervention could help clarify responsibilities and ensure open data initiatives like the Open Charge Point Interface (OCPI) improve transparency over the accessibility of the EV charging network.

2. Evidence from drivers

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



Respondents, EVA England January 2025 Flash Survey

When asked about their overall driving experience, one respondent commented on the accessibility challenges of public chargers:

“Some public charge points are difficult to use. Space is often very small and location of charge port on car can make getting into the space very difficult, as well as getting around the car to get cables in with other cars to close to manoeuvre easily- I’m fit and able-bodied too, the number of public chargers I’ve been to that would be unusable if disabled is far too high. This infrastructure needs to go in properly thought-out now with regulations on accessibility before we end up with thousands of chargers that some people just can’t use.”

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.”

3. Solutions

Encouraging the widespread adoption of PAS 1899 is the fastest and most efficient way of ensuring public charging infrastructure is reliably and safely accessible for EV drivers with disabilities.

The Government is currently working with the Motability Foundation, BSI, EVA England, disability groups and the industry to review the current standard with the aim of updating its minimum requirements, with re-publication expected in mid-2025.

We have seen with the provisions for public charging held within the Automated and Electric Vehicles (AEV) Act 2018 – where regulations have now been brought forward to enforce reliability, payment, pricing transparency and open data on chargepoints across the sector¹ – that Government intervention is needed to ensure compliance with consumer needs across the chargepoint sector. Without similar provision to enforce a minimum accessibility

¹ <https://www.gov.uk/government/publications/the-public-charge-point-regulations-2023-guidance/public-charge-point-regulations-2023-guidance>

standard, there is a risk public charging infrastructure could remain unsuitable for use by drivers with disabilities.

EVA England and Motability Foundation have already called for the Government to require that compliance with PAS 1899 is a condition of receipt of Government chargepoint grants. But users with disabilities have a right to be able to access any chargepoint, anywhere in order to refuel their EVs, and stronger intervention may well be needed to fulfil that right.

We therefore also recommend that the Government seeks to extend the consumer provisions within the AEV Act 2018 to cover accessibility requirements as well. This would ensure that Government has the necessary powers for collection of data on whether chargepoints are accessibility compliant, for subsequent monitoring of industry compliance with these requirements over time, and for moving to mandate the requirements should they not be delivered on a voluntary basis by all chargepoint manufacturers and providers.

The Planning and Infrastructure Bill provides a unique and timely opportunity to take forward that recommendation.

4. Where the Planning and Infrastructure Bill fits in

The inclusion of specific legal powers, allowing Government scrutiny and control over new charging installations and their appropriateness for disabled drivers, is the fastest and safest way to ensure future charging infrastructure is suitable for use by all drivers fairly and equally. Without such action, accessibility of the public charging network will continue to be impeded at a crucial time in its development.

Primary legislation containing sections relevant to this area of critical national infrastructure is rare. Failing to act now could therefore potentially lead to years of further installations that fail to meet minimum accessibility requirements, and costlier post-installation adaptations further down the line once the number of EV drivers with disabilities who are wholly or mostly dependent on the public network visibly increases.

The amendments we are proposing to the Planning and Infrastructure Bill build on the current EV section of the Bill: EV measures currently presented in the Bill aim to speed up the rollout of public charging infrastructure by easing the planning process for new installations; whilst the proposed amendments in this submission aim to provide essential protections that such new installations meet real world driver needs.

Crucially, we are asking that the Committee consider the merits of expanding the existing consumer provisions within the AEV Act 2018 to include a *provision* to mandate the accessibility requirements contained within PAS 1899 standard. The provision would only be brought forward should industry fail to comply with the standard on a voluntary basis. We argue this would provide Government with the following benefits:

1. The ability to respond early to consumer needs in such a way that minimises additional costs to an emerging industry

With a view to future mandation of the accessibility requirements within the PAS 1899 standard within a clear timeframe, such powers would incentivise CPOs to ensure new installations are up to standard on a progressive and planned basis. Lead times for industry to secure new hardware are 12-24 months. Providing sufficient notice of the intention to mandate, and the point at which government would take a decision to bring forward those powers to mandate, would minimise additional supply chain costs that might be incurred from forcing compliance to accelerated timescales.

2. Improving data gathering and ability to monitor compliance

No bodies, public or private, currently have an accurate picture of accessibility levels within the current public charging infrastructure. The Open Charge Point Regulations 2023², which fully came into force in November 2024, were a major turning point forcing location and pricing data of all public charging points, amongst other data, to be made publicly accessible live. Via this essential piece of legislation, Government and other bodies are able to monitor the public charging landscape and form an accurate assessment of current gaps and pricing discrepancies. Amending the Planning and Infrastructure Bill to provide similar monitoring powers for accessibility measures would grant Government and stakeholders similarly essential powers to gain a fuller understanding of the current suitability of public charging infrastructure for drivers with disabilities.

By including provisions for accessibility rights in this Bill the CPOs, who would benefit from the easing of planning requirements for new installations, as proposed in the current version of the Bill, would also face Government scrutiny over:

- Ensuring their installations are adequately suitable for use by drivers with disability requirements.
- Reporting up-to-date data on the current accessibility status of their charging infrastructure.

5. Suggested inclusion in the current legislature

Clause 43, page 55, line 5, at end insert-

(1) The Automated and Electric Vehicles Act 2018 is amended as follows.

(2) In section 10 (Public charging or refuelling points: access, standards and connection)

(a) in subsection (1), after subsection (b) add -

"(ba) the accessibility of public charging or refuelling points", and

(b) after subsection (3) add -

"(3A) Regulations under subsection (1)(ba) may, for example, require the operator of a public charging or refuelling point to ensure that the point complies with minimum specifications for placement of a charge point display, bay size, and the height and weight of the charging cable."

(3) In section 14 (Transmission of data relating to charge points) in subsection (2) after "energy consumption" add "accessibility".

² <https://www.evaengland.org.uk/2024/11/29/more-public-charge-point-regulations-in-effect/>

About our organisations



The Motability Foundation is a national charity set up with all party parliamentary support in 1977 and incorporated by Royal Charter. We fund, support, research and innovate so that all disabled people can make the journeys they choose. We oversee and support the Motability Scheme, award grants to other charities and organisations working to make transport accessible and carry out ongoing research to inspire innovation.

Harry Fisher, Innovation Manager, Motability Foundation

harry.fisher@motabilityfoundation.org.uk



[EVA England](#) is a membership organisation supporting existing and prospective EV drivers, and championing policies that accelerate EV adoption. Our mission is to make England a better place for EV drivers by advocating on their behalf to the Government, local authorities, industry and media.

Dr Vicky Edmonds, Chief Executive, EVA England,

vicky.edmonds@evaengland.org.uk



[New AutoMotive](#) is a think tank and data consultancy which works to increase the pace of the clean energy transition in road transport. We use analysis to inform the public and influence policy development, publishing regular data and research on the switch to electric and what government needs to do to make this happen.

Ben Nelmes, Chief Executive, New AutoMotive,

ben@newautomotive.org.



[The REA](#) is a not-for-profit trade association, established in 2001. It is a coalition built to be the voice for renewable energy and clean technology in the UK. We are the largest renewable energy and associated clean technology body in the UK, with around 500 member organisations representing every type of renewable energy.

Matt Adams, Head of Transport and Innovation,

madams@r-e-a.net