

MAYOR & CABINET		
Report Title	Low Emission Vehicle Charging Strategy 2019 (LEVCS)	
Key Decision	Yes	Item No
Ward	All	
Contributors	Executive Director for Customer Services	
Class	Part 1	Date: 10 July 2019

1. Summary

- 1.1. Lewisham Council has been developing a dedicated ‘Low Emissions Vehicle Charging strategy’ (Appendix 1) for the Borough in direct response to the growing appetite for electric and hybrid vehicles in both the private and commercial communities. It is also in response to the strategy objectives set out in the Mayors Transport Strategy, London Plan, recently adopted Lewisham Transport Strategy & Local Implementation Plan and Lewisham Air Quality Action Plan (Background Documents 1-4).
- 1.2. The Strategy has been developed between council officers with direction from the Cabinet Members for Environment and Transport (Cllr Dacres and Cllr McGeevor), the Council’s Air Quality Champion (Cllr Krupski) and members of the Sustainable Development Select Committee. Project Centre were commissioned to write the strategy.
- 1.3. The strategy sets out a clear vision;

“To ensure that all of Lewisham’s residents, businesses and visitors are within 500m of an electric charging point by 2021, with a range of options available, that remain fit for purpose and encourage further uptake of low emission vehicles”.

The four key strategy objectives are:

- 1) To support the following types of charging through provision of appropriate infrastructure in the right locations:
 - a) Charging points in residential areas

- b) Charging points in town centres, workplaces and other key destinations
- c) Charging points for car club vehicles
- d) Charging points for freight and servicing
- e) Charging points for taxis

2) To make use of funding opportunities in order to provide and maintain EVCPs

3) To ensure the charging network remains fit for purpose, can cater for expansion and is adaptable to emerging technologies

4) To encourage more sustainable travel, including electric vehicles for any essential car trips, through supporting policy, initiatives and public engagement exercises, drawing on best practice from around the UK and beyond.

1.4. The draft strategy has been developed over 2018-2019 and has seen several revisions due to the fast paced nature in the development of the technology involved in this emerging industry. The strategy needed to be updated in terms of data and information in order to ensure its relevance for the initial life span of the document which is 2019 to 2022.

1.5. On the 29th June 2018, the draft “Low Emission Vehicle Charging Strategy” went to public consultation for a period of 45 days closing on the 13th August 2018. There was a total of 122 respondents to the consultation. A full breakdown of responses can be found in the Consultation report (Appendix 2) However a summary of the headline results are set out below:

- **84%** Supported or strongly supported the LEVCS overall vision.
- Between **72% -88%** dependant on specific objective agreed or strongly agreed with them as they were set out in the strategy.
- **66%** agreed or strongly agreed that the targets set out in the strategy were sufficiently ambitious.

1.6. There were several recommendation as a result of the consultation which have been incorporated in the Draft strategy presented with this report.

2. Purpose of the Report

2.1 The purpose of this report is to detail the aims and objectives of the strategy, present the results of the public consultation including highlighting changes made to the document. The report seeks approval from the Mayor to adopt the strategy..

3. Recommendations

3.1 The Mayor is recommended to:

- note the consultation responses
- note the changes to made to the draft Strategy following consideration of consultation responses
- approve the adoption of the 'Low Emission Vehicle Strategy' as council policy;

4. Policy Context.

4.1 The LEVCS will become Council policy, and it is consistent with other policy. It aligns and supports the priorities of the Borough's Corporate Strategy 2018-2022 especially priorities 1, 4 and 6 below;

- **Open Lewisham**, Lewisham is a welcoming place of safety for all, where we celebrate the diversity that strengthens us.
- **Building an inclusive local economy**, everyone can access high-quality job opportunities, with decent pay and security in our thriving and inclusive local economy.
- **Making Lewisham greener**, everyone enjoys our green spaces, and benefits from a healthy environment as we work to protect and improve our local environment.

There are further internal and external policy documents that influence or are influenced by the LEVCS. A detailed analysis of the policies can be found in chapter 1 of the LEVCS but below is an outline of the policies that the LEVCS aligns with or takes direction from.

- **The Climate Change Act 2008** – This Act saw the UK tasked with reducing emissions by at least 80% by 2050, with London being set a target to reduce annual emissions of CO₂ by 60% in the same time frame. The responsibility was placed on all sectors; however, the Mayor's Climate Change Mitigation and Energy Strategy (CCMES) suggested the transport sector should contribute to the wider target by making a 48% reduction in transport CO₂ emissions.
- **The Government's Clean Air strategy**- This strategy was published in January 2019, setting out plans to meet ambitious legally binding international targets to reduce emissions of the 5 most damaging air pollutants by 2020 and 2030. This strategy outlines the government's ambitions relating to reducing air pollution, making air healthier to breathe, protecting nature and boosting the economy. The strategy sets out a clear direction for future air quality policies and goals. Emissions from road transport have been in the spotlight because of their impact on

local air quality, but the government is committed to cutting air pollution from all forms of transport.

- **The London Plan** - states that all new developments must provide 20% active provision of parking spaces with electric vehicle chargers and an additional 40% of passive spaces which have the cabling prepared so that chargers can be added when demand increases in the future. Installing passive ducts and cabling greatly reduces the time, cost and disruption of installing additional bays in the future.
- **Mayors Transport Strategy (MTS)** - The MTS introduces the concept of healthy streets and suggests that streets make up 80% of the city's public space. There are 10 components of the healthy streets agenda, two of which directly relate to electric vehicles; improving air quality and reducing traffic noise. Electric vehicles would contribute to achieving both of these goals within Lewisham and across the city.

A key action within the MTS was the implementation of the Ultra Low Emission Zone (ULEZ), which came into force in 2019 and covers London's current congestion zone area for vehicles failing to meet the Euro 6 emissions standard for diesel, and Euro 4 for petrol (Euro 3 for motorcycles). An expansion in the ULEZ area is programmed for October 2021 and this new area will include all parts inside the north and south circular which covers approximately 50% of Lewisham.

- **Lewisham Air Quality Action Plan (AQAP) 2016 -2021** - This AQAP has been produced as part of the council's duty to London Local Air Quality Management. It outlines the action we will take to improve air quality in the London Borough of Lewisham between 2016–2021. It includes an action to increase the number of electric vehicle charging points across the borough.
- **Lewisham Transport Strategy & Local Implementation Plan 2019-2041 (LIP3)** – The LIP sets out how the borough is going to achieve the targets set out in the MTS. Several LIP objectives and programmes focus on reducing traffic and improving air quality. It recognises that whilst the overall aim is to encourage a shift to more sustainable modes of transport, there will always be a certain proportion of trips that need to be made by motorised vehicle. The borough has a role in facilitating the transition to electric vehicles for these trips, and the LIP includes a contribution towards the implementation of electric vehicle charging points.

5. Background context.

- 5.1 Improving local air quality by reducing emissions from road traffic is a priority for Lewisham. In February 2019, Lewisham Council became the second London

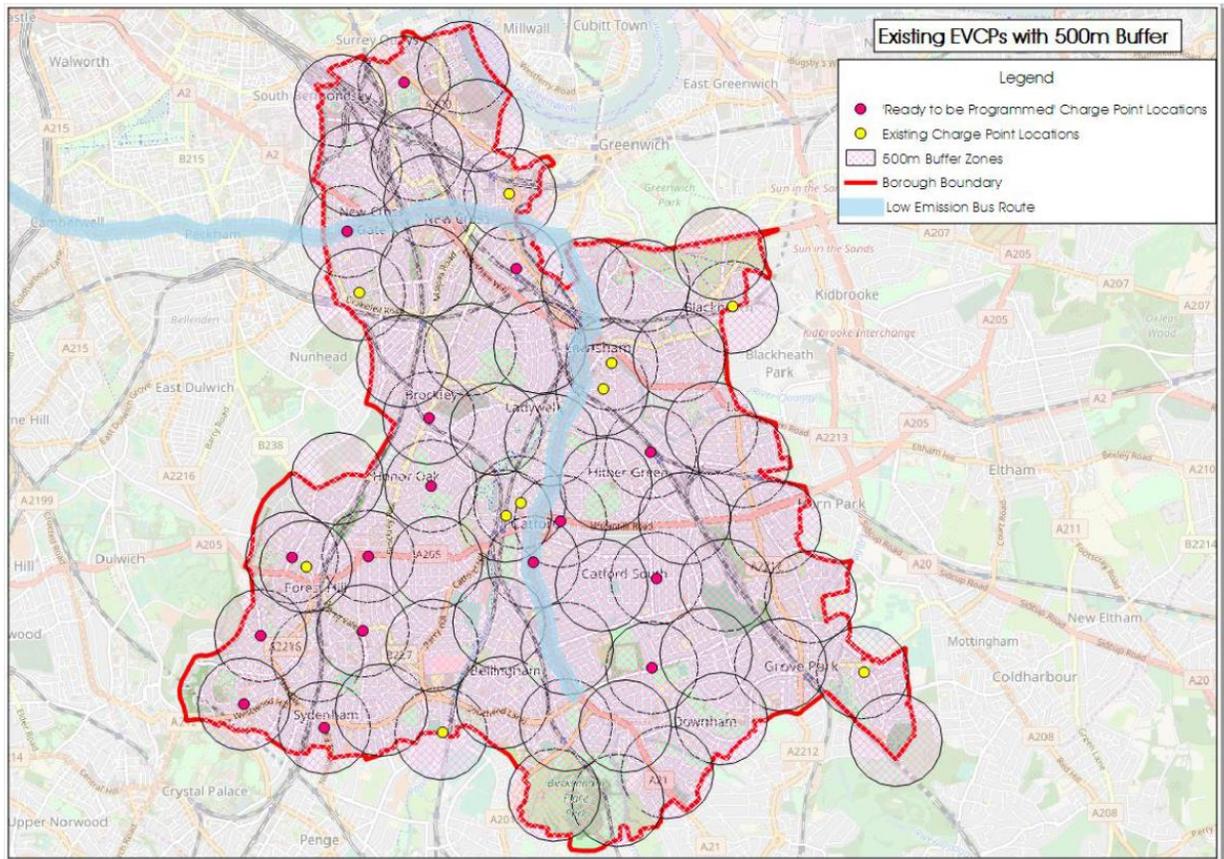
borough to declare a climate emergency and began working towards prioritising the delivery of a carbon neutral borough by 2030.

- 5.2 Providing an accessible network of electric vehicle charging points will play a vital role in facilitating the uptake of electric vehicles, which is a necessity to deliver air quality improvements and achieve the Mayor of London's target for a zero-emission transport network by 2050.
- 5.3 Whilst electric vehicles are likely to play a significant role in improving air quality in the medium term; they should be considered as part of the mix when moving towards healthier and more sustainable modes of transport, rather than a wholesale solution. As supported by the Lewisham Transport Strategy and LIP 2019-2041 and Lewisham's Cycling Strategy 2017 documents, enabling more people to travel actively and reducing car-dependency would have a more lasting and holistic impact on health and air quality in Lewisham.
- 5.4 Electric vehicle ownership in Lewisham is forecast to rise rapidly in the next eight years with an estimated 1,398 plus electric vehicles registered to Lewisham residents and businesses by 2025 (TfL ULEV Delivery Plan). This represents a huge rise in ownership levels in the borough from just 280 electric vehicles registered at the start of 2018.

The four key objectives of this strategy are to:

- Support the following types of charging through provision of appropriate infrastructure in the right locations:
 - Charging points in residential areas
 - Charging points in town centres, workplaces and at other key destinations
 - Charging points for car club vehicles
 - Charging points for freight and servicing vehicles
 - Charging points for taxis
- To make use of funding opportunities in order to provide and maintain EVCPs
- Ensure the charging network remains fit for purpose, can cater for future expansion and is adaptable to emerging technologies;
- Encourage more sustainable travel, including electric vehicles for any essential car trips, through supporting policy, initiatives, and public engagement exercises, drawing on best practice from around the UK and beyond.

Figure 1 - Map showing an indicative map of locations required to fulfil the LEVCS Vision



- 5.5 The map in Figure 1 shows that at least a further 47 charging point locations (with multiple points per location) are required over the next 2 years to fulfil the strategy’s vision.
- 5.6 A range of electric vehicle charging infrastructure will be required to meet the varied needs of residents and commercial electric vehicle users. These will be located in appropriate locations in residential streets, car parks and popular destinations such as high streets, shopping and leisure centres. They will consist of a mix of types of charger: trickle (3kw), standard (7kW) and rapid (50kw) to cater for different residential and commercial needs. This will be achieved by working in partnership with a number of charging point providers, thereby providing an element of competition and helping to keep prices down for the user.
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- 5.8 This will be achieved by working in partnership with a number of charging point providers, thereby providing an element of competition and helping to keep prices down for the user. The Council will enter into agreements with such providers in accordance with the Council’s procurement guidelines.

6. LEVCS Consultation results

6.1 The Draft Low Emission Vehicle charging Strategy went to public consultation between the 29th June and the 13th of August 2019. The full consultation report is appended to this report (Appendix 2). Below is a summary of results and a breakdown of each question in the form of bar graphs.

6.2 Overall, there were 122 responses to the consultation recorded. The majority of respondents were residents of LBL, but 2 respondents lived elsewhere. The survey focused on two key areas. Firstly, what were resident's thoughts on the proposed Low Emission Vehicle Strategy Vision. Secondly, the survey examined respondents travel habits and opinions on the use of electric vehicles.

6.3 Responses to the Low Emission Vehicle Strategy Vision:

Question 1: Support for the Strategy

The majority (84%) of respondents support the proposed 'Low Emission Vehicle Strategy Vision'. The share of respondents in favour of the strategy was higher among those with access to EVs (94%), while 83% of those without access supported the strategy.

Question 2: Should charging infrastructure be installed

Overall, 84% of respondents support Objective 1 of the strategy, and 7% are in opposition. A number of issues were raised in the comments, these included: charge points obstructing the footway, the need to prevent vehicles that are not charging parking in EV spaces, and the importance of minimising the walking distance to chargers. Respondents who expressed views opposing the strategy and the objective were largely concerned about the council promoting EV as a 'stop-gap' measure, where the resources could be better utilised in promoting fully sustainable and long-term methods of transport.

Question 3: Should EVCPs remain cost neutral to the council?

72% of respondents either support or strong support this Objective 2. A relatively high 18% stated they 'neither support nor oppose' and a number of comments stated that there was insufficient information to answer the question. Several comments highlighted the importance that charging remain cheaper than traditional fuels.

Question 4: Should the charging network be made future proof?

The majority of respondents (88%) either support or strongly support Objective 3, and most of the comments also reflect support for the concept. There were several recommendations for the use of lamp column or pop up chargers.

Question 5: Should the council support the uptake of low emissions vehicles

82% of respondents were in favour of the objective 4, to support the uptake of low emissions vehicles. Many commenters hoped the council would prioritise sustainable modes of transport over electric vehicles. Some were still in favour of electric vehicles as an improvement over traditional vehicles. Others opposed the objective as it could divert resources away from sustainable modes or encourage the use of motor vehicles. Some commenters raised concerns that the cost of electric vehicles means they are not accessible to all.

Question 7: Are the targets suitably ambitious?

Overall, 66% of respondents agreed that the targets set in the strategy are suitably ambitious, yet realistic. 34% disagreed with the statement with 10 comments stated that the strategy could be more ambitious, and 8 comments requesting faster implementation targets.

Question 6: Is anything missing from the strategy, which will ensure its success?

There were 59 answers recorded which largely mirrored the previous comments, particularly the need to prioritise sustainable modes of transport. Suggestions included; subsidies to assist people with switching to electric vehicles, enforcement to ensure only EVs use EV bays and mandatory chargers on new developments.

6.4 Travel habits and opinions on EVs:

Question 8: Access to a motor vehicle

70% of respondents had access to a motor vehicle. Of these only 12% used that vehicle more than 6 times a week, suggesting they do not use it to commute. 46% only used it once or twice a week.

Question 9: Would you use an EV for your business

Of the business owners surveyed 66% would consider using an electric vehicle but again the number of charge points was a concern.

Question 10: Do you own an EV and if not, would you consider buying one?

An average of 38% are not considering purchasing a full electric or hybrid vehicle. A proportion of which commented that they do not require a vehicle at all. 24% are thinking of buying an EV. 66% of those who do not currently own an electric vehicle stated that they would consider purchasing one if more charge points were available in the borough.

Question 11: Any other comments

Again, the answers recorded largely mirrored the previous comments. Two respondents raised concerns of if and how the strategy will be integrated with policies of other London boroughs.

Summary of Results

- 6.5 In summary, the majority of residents who responded to the consultation were in favour of LBL's proposed Low Emission Vehicle Strategy Vision overall (84%). They are also in agreement with the four individual objectives, including the installation of more electric vehicle charging infrastructure (between 72 and 88% in favour). 66% of respondents agreed that the targets set in the strategy are suitably ambitious, yet realistic, with a small number asking for more ambitious targets.
- 6.6 The majority of respondents own a traditional diesel or petrol vehicle, and many would consider switching to a full electric or hybrid in the future if more charging infrastructure was provided in the borough. Of the business owners surveyed 66% would consider using an electric vehicle but again the number of charge points was a concern.

7. Key changes made to the Draft LEVCS as a result of the consultation

- 7.1 Following the analysis of the consultation responses, the list below highlights the main changes that have been made to Lewisham's draft EVCP Strategy document:
- **Objective 2** – has been simplified to the following wording: “To make use of funding opportunities in order to provide and maintain EVCPs”
 - The strategy emphasise the importance of walking and cycling too, in combination with EVs. Lewisham's Cycling Strategies should also be referred to. Objective 4 has therefore been reworded to reflect our overarching LIP objective of supporting more sustainable modes of travel “Encourage more sustainable travel, including electric vehicles for any essential car trips, through supporting policy, initiatives, and public engagement exercises, drawing on best practice from around the UK and beyond”.
 - Lewisham's desirable footway width has been included within the strategy, along with any other criteria the borough uses to locate potential EVCP locations. The strategy also states that Lewisham would not discount installing charging units on the carriageway, where it may be suitable to do so.
 - Reference has been made to the sections of Lewisham's LIP which mention sustainable freight transport.
 - The target to achieve 500m coverage has been updated, to be achieved by 2021 instead of 2020, in line with the expansion of the ULEZ.
 - A number of updates have been made to reflect recent policy developments, funding sources and data. For instance, reference to Lewisham's Parking Policy Review has been included and also the newly implemented ULEZ. The

maps, and EVCP uptake graphs included within the draft EVCP Strategy have been updated to align with 2018 data and information.

- The strategy includes the potential to electrify the Council fleet.
- The strategy reflects on the challenges regarding enforcement of EVCPs.
- Reference has been made to Zap-Map, which is the most up to date database for information on EVCPs.
- The section on trickle/residential chargers in the draft EVCP Strategy has been updated to prioritise the bollard solution over the lamp column solution (include trip hazard, placing of lamp columns and earthing issues associated with lamp columns).

8. Financial implications

8.1 Funding to develop the LEVCS was identified in the Local Implementation Plan (LIP) Annual spending submissions for 2017/18, a further allocation was identified in the 2018/19 to complete the consultation report and make amendments to the strategy.

8.2 Financial resources are required in order to develop projects identified by the strategy. Where new projects and funding gaps are identified, the need for such resources will be considered as part of the strategy. Below are the current funding streams identified at the time of this report.

8.3 Funding.

The borough is looking to provide different types of charging infrastructure residential, destination and rapid options, detailed below are the current funding streams available to support each option.

8.4 Generic borough funding.

In the latest LIP annual spending submission 19/20 the borough has a LIP programme Noise and Air Quality with a **£185,000 allocation** (including a £90,000 carryover from the previous LIP) to facilitate the delivery of the objectives identified in the strategy. The majority of this allocation will be used to fund a position to deliver the programme and used to match fund the Go Ultra Low City Scheme (GULCS) funding identified below.

8.5 Go Ultra Low City Scheme.

The Go Ultra Low Cities scheme is part of a wider £600 million investment from the Government to encourage EV uptake in the UK. London Councils submitted a London wide bid for funding. Lewisham has successfully applied for £300k funding which requires a 25% match funding element. The funding must be used to fund residential charging infrastructure such as the bollard options identified in the LEVCS strategy. The borough is currently in the final stages of procuring a provider through the GULCS procurement framework to deliver this element of the infrastructure.

8.6 **Rapid chargers (50kW).**

TfL have publicised their rapid charging framework, offering the scheme to local authorities within London. They are proposing to identify locations across TfL, borough and private land which would be capable of hosting EV rapid charging infrastructure.

Under the scheme, chosen locations would be tendered out to five charge point operators (ESB EV Solutions, Fastned, GeniePoint, POLAR and Source London) who will bid for a concession contract to install, operate and maintain rapid charge points at their own cost. TfL will fund the installation of the power infrastructure and street furniture. TfL is working with the boroughs and investing £18million to unlock potential sites, including upgrading the power supply.

8.7 **Standard (7kw) charging point providers.**

There are several private provider of destination charging infrastructure offering differing funding models. The borough currently has a company called Source London operating a total of 28 destination charge point with a further 17 programmed for installation this year. The cost of the installation for these chargers and ongoing maintenance is covered by the provider and the council receives an annual licence fee for each charge point. The borough is currently investigating other providers to make sure the borough has a good mix of providers to promote competition.

9 Legal Implications.

9.1 The adoption of policy, strategies and plans that fall outside of the council's policy framework is a matter reserved to the mayor.

9.2 The Council has a wide general power of competence under Section 1 of the Localism Act 2011 to do anything that individuals generally may do. The existence of the general power is not limited by the existence of any other power of the Council which (to any extent) overlaps the general power. The Council can therefore rely on this power, where appropriate, to undertake the proposals contained in the Low Emission Vehicle Charging Strategy.

9.3 The Equality Act 2010 (the Act) introduced a public sector equality duty (the equality duty or the duty). It covers the following protected characteristics: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

9.4 In summary, the Council must, in the exercise of its functions, have due regard to the need to:

- eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act.
- advance equality of opportunity between people who share a protected characteristic and those who do not.
- foster good relations between people who share a protected characteristic and those who do not.

- 9.5 It is not an absolute requirement to eliminate unlawful discrimination, harassment, victimisation or other prohibited conduct, or to promote equality of opportunity or foster good relations between persons who share a protected characteristic and those who do not. It is a duty to have due regard to the need to achieve the goals listed at 10.1 above.
- 9.6 The weight to be attached to the duty will be dependent on the nature of the decision and the circumstances in which it is made. This is a matter for the Mayor, bearing in mind the issues of relevance and proportionality. The Mayor must understand the impact or likely impact of the decision on those with protected characteristics who are potentially affected by the decision. The extent of the duty will necessarily vary from case to case and due regard is such regard as is appropriate in all the circumstances.
- 9.7 The Equality and Human Rights Commission has issued Technical Guidance on the Public Sector Equality Duty and statutory guidance entitled “Equality Act 2010 Services, Public Functions & Associations Statutory Code of Practice”. The Council must have regard to the statutory code in so far as it relates to the duty and attention is drawn to Chapter 11 which deals particularly with the equality duty. The Technical Guidance also covers what public authorities should do to meet the duty. This includes steps that are legally required, as well as recommended actions. The guidance does not have statutory force but nonetheless regard should be had to it, as failure to do so without compelling reason would be of evidential value. The statutory code and the technical guidance can be found at:
<https://www.equalityhumanrights.com/en/advice-and-guidance/equality-act-codes-practice>

<https://www.equalityhumanrights.com/en/advice-and-guidance/equality-act-technical-guidance>
- 9.8 The Equality and Human Rights Commission (EHRC) has previously issued five guides for public authorities in England giving advice on the equality duty:
- The essential guide to the public sector equality duty
 - Meeting the equality duty in policy and decision-making
 - Engagement and the equality duty: A guide for public authorities
 - Objectives and the equality duty. A guide for public authorities
 - Equality Information and the Equality Duty: A Guide for Public Authorities
- 9.9 The essential guide provides an overview of the equality duty requirements including the general equality duty, the specific duties and who they apply to. It covers what public authorities should do to meet the duty including steps that are legally required, as well as recommended actions. The other four documents provide more detailed guidance on key areas and advice on good practice. Further information and resources are available at:

10 Crime and Disorder Implications

- 10.1 There are no direct crime and disorder implications arising from this response.

11 Equalities Implications

- 11.1 The Council's Comprehensive Equality Scheme for 2016-20 provides an overarching framework and focus for the Council's work on equalities and helps ensure compliance with the Equality Act 2010.
- 11.2 An Equalities Analysis Assessment (Supporting document 5) has been developed alongside the LIP to ensure that any potential adverse impacts were fully considered and, where necessary, appropriate changes made. The overall findings of the assessment were that the proposals within the LIP on balance do not discriminate or have significant adverse impacts on any of the protected characteristics. This includes the provision of Electric Vehicle Charging Points.
- 11.3 As acknowledged earlier in this report, the Council recognises the need to be mindful of the potential impact on available footway widths as a result of the installation of Electric Vehicle Charging points. Guidelines on minimum clearances will be adhered to and consideration given to locating charging points in parking bays where appropriate.
- 11.4 It is also recognised that, at present, new Electric Vehicles remain relatively expensive to purchase, meaning that they may be less accessible to those on lower incomes. However, a number of grants are available to help reduce the cost of ownership and the Mayor of London has plans as part of the ULEZ supporting measures to make grants available to those on lower incomes. The second hand market is also expected to increase availability of more affordable options in time.

12 Environmental Implications

- 12.1 The delivery of the strategy will help enable residents, businesses and visitors to the borough to gradually transition to electric vehicle ownership/use. This should result in improvements to air quality.

13. Human Rights Act Implications

- 13.1 The Strategy, if adopted, would not interfere with any Convention rights. Article 1 of Protocol 1, the right to peaceful enjoyment of one's property, might be triggered. However, this is not an absolute right and so may be balanced against the benefits brought about by the Strategy. Officers are of the opinion that the benefits of the Strategy would outweigh interference of this right.

14. Background Papers and originator

No	Background Documents	Location
1	Mayors Transport Strategy (MTS)	https://www.london.gov.uk/what-we-do/transport/our-vision-transport/mayors-transport-strategy
2	London Plan	https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan/draft-new-london-plan/
3	Local Implementation Plan 2019 to 2041	https://lewisham.gov.uk/documents?query=healthy%20neighbourhoods&sort=score
4	Lewisham Air Quality Action Plan	https://lewisham.gov.uk/myservices/environment/air-pollution/read-our-air-quality-action-plan-and-other-reports
5	Lewisham Local Implementation Plan - Equalities Analysis Assessment	http://councilmeetings.lewisham.gov.uk/documents/s62495/Equalities%20Impact%20Assessment.pdf

Appendices:

Appendix 1 – Draft Low Emission Vehicle Charging Strategy 2019-2022

Appendix 2 – Consultation report on Draft Low Emission Vehicle Charging Strategy 2019-2022