

FAO: Sue Jackson
Hertfordshire County Council
By email only

Our Ref: EL/HCC/EV2022
Your Ref: LCWIP/NHDC
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12 December 2022

Dear Sue,

Re: Draft Hertfordshire County Council: EV Charging Strategy

North Herts Council (NHDC) is generally supportive of the EV Charging Strategy with the following comments and recommendations.

Climate change

1. In §3.1 (*International and National Policies*) paragraph 1 (and possibly also §1.1 (*Background*) paragraph 1), please add these government milestone commitments:
 - [68% reduction by 2030](#) (Nationally Determined Contribution, as communicated to the United Nations Framework Convention on Climate Change).
 - [78% reduction by 2035](#) (UK's Sixth Carbon Budget, enshrined in The Carbon Budget Order 2021)

Local strategies

2. Under §3.4 (*District & Borough strategies and activity to date*), please add the following:

North Herts Council (NHDC) has adopted policies in its Parking Strategy and Climate Change Strategy to increase EV chargepoint provision in its car parks, and on-street where “viable, practical and necessary.” It is also committed to “working with other public and private entities/ partners to improve provision of EV charging.”

NHDC is in the process of replacing its fleet vehicles with ULEVs and EVs, and now has five BEVs and two PHEVs. It has procured six EV chargepoints for the exclusive use of NHDC fleet vehicles.

In 2014 NHDC obtained an OLEV grant and procured twelve chargepoints (including two for council fleet vehicles) in five car parks. As of December 2022, it is inviting chargepoint operators to bid for a concession contract to supply and operate up to thirty-two chargepoints (including replacing the 2014 chargepoints) in up to eight council-owned car parks. Six of these would be for council fleet vehicles.

Core HCC strategy

3. §6.4 (including Table 6.1), §6.5 and Appendix A are the most critical components of the strategy and need to be identified more clearly as such, perhaps by summarising and referring to them in an executive summary.
4. Appendix A proposes as a “Suggested Rule” under *General location* that “No new on street electric vehicle chargepoints should be provided if public chargepoints in the vicinity (e.g. approx 5 mins walk) are available and underutilised.” This would be better proposed as guidance rather than a rule, since discretion and flexibility will be needed, at least during these early years when we are still learning how to adapt to EVs.
5. This paragraph in Appendix A is the only place where a maximum walking time to an EV chargepoint is mentioned, yet it is critically important to the strategy. More detail and evidence are needed to answer these questions:
 - a. What distance (as opposed to walking time, which varies from person to person) is an appropriate maximum, based on peer-reviewed research? (For reference, 5 minutes at 4kph = 335 metres.)
 - b. How will equality considerations be taken into account?
 - c. How will consideration be given to the (actual or perceived) safety of a walking route, and hence whether it should count when assessing the proximity of a home to an EV chargepoint?
6. Appendix A further proposes as a “Suggested Rule” under *Management of EV parking bays* that, “On Street charging points for individual residents will not be provided (with possible exemption to rule for blue badge holders with dedicated spaces).” [National guidance on eligibility for a Blue Badge](#) refers to not being able to walk more than 50 metres. Many people fall within a spectrum of need and vulnerability between qualifying for a Blue Badge and being able to walk confidently after dark or in adverse weather for five minutes. Here too, a more nuanced approach is needed.
7. The public expect local government to provide EV charging infrastructure in council car parks and in residential urban areas. Therefore, local authorities need to be prepared and resourced to deliver that infrastructure, and/or to guide private sector companies to deliver it whilst also protecting public interests.

8. The challenge is that demand for that infrastructure will grow exponentially (see points made below under *Forecasting*). That will soon require dedication of considerably more officer time and expertise than is currently available to:
 - a. Identify and assess hundreds of sites, installation arrangements and equipment specifications for suitability, based on various complex factors, including appropriate and unconflicted use of land, availability of grid capacity, equality, heritage, landscape, ecology, public health, etc.
 - b. Procure the supply of EVCPs on public land
 - c. Manage EVCP supply contracts
 - d. Manage concession and/or service contracts
 - e. Make and enforce TROs governing EV bays
9. NHDC would therefore like to see HCC make a stronger commitment to support and assist districts and boroughs by:
 - a. Leading on joint procurement exercises
 - b. Providing or assisting with the procurement of GIS tools for generating isodistance walking maps centred on locations of actual or proposed chargepoints; and for collating (automatically where possible) and analysing walking route qualities (e.g. reported crimes and collisions, local perceptions of safety, natural surveillance, lighting, inclines, steps, etc).
 - c. Sharing best practice
 - d. Providing an EVCP request portal (see below under *Data collection on EVCP demand*).
 - e. Providing relevant training
 - f. Appointing an officer or consultant to be an in-house expert for all districts and boroughs, to provide timely advice and assistance as needed
10. This accords with the objectives set out in §2.2, in particular, “To work alongside Districts and Boroughs to support the development of an EV charging network which promotes equal access to EV charging including for those in rural and more remote locations and areas of deprivation based on available evidence of EV charging need.”

Electric Club cars

11. NHDC would like HCC to proactively support and work together with districts and boroughs in providing on-street chargepoints for the exclusive use of club cars, and to give them freedom to locate club car bays on-street if that is what they deem to be most appropriate (i.e. disregarding the flowchart in Figure 6.4).

12. Club cars need to be located in convenient locations to be an attractive alternative to owning a car. They also need to be in prominent locations for effective marketing of the service. In many cases that will mean providing dedicated bays on-street.
13. Electric club cars offer an attractive ‘green’ solution for people needing occasional use of a (second) car. Club cars are mainly used for relatively short trips. Users would not want to pay the hourly rental charge while their vehicle is recharged. Therefore, charging at base is the most appropriate solution.

Electric taxis

14. NHDC would like HCC to proactively support and work together with districts and boroughs in providing on-street chargepoints for the exclusive use of taxis, to give the flexibility to locate taxi charging bays on-street if that is what they deem most appropriate.
15. Districts and boroughs will need to work with their licensed taxi drivers and associations to identify the most convenient and appropriate locations for EV taxi chargepoints. Although off-street locations may often be the most appropriate location, there are some cases (e.g. in Baldock High Street – see Figure 1) where on-street (in-highway) provision could be appropriate.



Figure 1: Example from Baldock of where it may be appropriate to provide EV taxi chargepoints in the highway

Data collection on EVCP demand

16. §7.2 refers to “Resident requests for chargepoints (where known)” and Table 11.3 includes an action, “D[istricts]s and B[oroughs]s confirm if location engagement is desired. Share any resident requests or other inputs to EV mapping tool/review process, if required.”

17. The number of requests for EVCPs is going to grow over the coming years, potentially exponentially if provision lags demand from owners and users of EVs. It could become a significant administrative burden on elected members and a handful of officers to collect and collate these requests manually.
18. Therefore, NHDC would like HCC to provide a public portal where residents anywhere in the county may enter some key details to help guide HCC, districts and boroughs on where there is unmet demand.
19. This data could be fed into HCC's EV mapping tool.
20. Data that might be collected on EVCP requests could include:
 - a. partial home postcode;
 - b. month and year of acquisition of EV;
 - c. vehicle model (to ascertain battery capacity and efficiency in terms of KWh/mile);
 - d. expected monthly mileage (to ascertain likely electricity consumption);
 - e. distance/time the owner is prepared to walk to/from an EVCP.
21. The portal will require at least some basic reporting tools to enable districts and boroughs to extract data to help them plan and provide appropriately, e.g. by notifying EVCP providers with which they are working (on a procurement or concession basis).

Forecasting

22. Section 5 needs to make it much clearer that we are at the very start of an S-curve growth in EV take-up. Exponential growth (a word that appears not to be used in this strategy) is deceptively benign in the early stages. But it can rapidly become overwhelming if not adequately planned for.
23. It would be worth showing some additional graphs after Figure 5.1 to show this:
 - a. BEV versus non-BEV sales, which will provide an indication of where on the 'S'-curve we are at with BEV sales.
 - b. Proportion of all licensed vehicles that are BEVs, to make clear how small the level of demand for EV charging is now compared with what it will be when the transition of the active vehicle fleet to BEVs is completed.

Miscellaneous points

24. It is established practice to use the term "people walking or cycling" rather than "pedestrians and cyclists" to avoid appearing to create artificially distinct classes of road users.
25. In Table 4.1, in the ninth bullet point under *Challenges*, it would be helpful to provide an explanation and/or example of what are "unrealistic expectations". In other words, what expectations are realistic?

26. Please include the reference number and link when referring to the new BSI EVCP accessibility standards, [PAS 1899:2022](#).
27. There are some minor corrections that will need to be picked up in proofreading, e.g. a broken footnote link on page 22, and a missing word in the first bullet in Table 6.1 (“car [park]”).

Yours sincerely,



Edward Leigh
Senior Transport Policy Officer