

Draft Implementation Plan: Vision for Scotland's public electric vehicle charging network

Consultation Identifier Questions

Q1. Do you think we have correctly considered the role of the private sector in delivering future public EV charging infrastructure?

More information

As of November 2024, Scotland met its target for 6,000 public EV charge points through a combination of public funding and private investment.

To achieve our commitment to deliver approximately 24,000 additional public EV charge points by 2030, the Implementation Plan outlines how the private sector will take on a leading role in funding public EV chargers for cars and vans, scaling up deployment and using the right charge points in the right locations to ensure a sustainable, effective and accessible public charging network that serves all of Scotland.

- Yes
 No

If not, what else should we consider?

Private investment to date varies nationally and HITRANS believe this needs to be reflected in the plan. Figures from SFT (source not recorded) said national private funding is approximately 50%. Across the HITRANS EVIF region (Argyll and Bute, Western Isles, Orkney and Shetland) that private funding is just 9%. On a technology adoption curve that puts the region far behind the private sector taking a leading role in public EV charging installations. Islands also cannot offer a joint network portfolio in the same way mainland LAs can to spread costs.

Q2. The public EV charging infrastructure must scale up rapidly to meet future EV demand and can do so with private sector investment. Do you agree with this assessment of public EV charging infrastructure as it exists in Scotland today?

More information

Research suggests that by 2030, Scotland will need between 22,000 and 30,000 public charge points. To achieve this, we will need to accelerate the growth of the network at pace to meet demand, along with investment to fund it. It is now unsustainable for the levels of investment required to be provided through public funding. Delivering approximately 24,000 additional public charge points by 2030 will necessitate an 8 fold increase in the level of private sector investment over the next 5 years.

The private sector invested approximately £25 to £35 million in expanding public EV charging infrastructure in Scotland in 2023 and is expected to have invested between £40 million and £55 million this year. While plans for future investment remain confidential, consultation suggests considerable levels of investment is planned for future years.

- Agree
 Disagree

If not, why not?

HITRANS agree, private sector funding has a key role to play in scaling up national infrastructure. However, whilst it's acknowledged that this won't be evenly distributed, transparent & measurable support needs to be **planned** for remote, rural and island regions that do not have the commercial viability of more populated areas, to give them more certainty over the future of their charging networks and to enable the required collaboration that has been identified. There is currently an expectation that some areas of the market are not commercially viable, and whilst mitigation is addressed in the draft plan, contingency in the case of failure is not addressed.

Q3. How would you approach the challenge of encouraging public charge point operators to invest in more marginal, lower traffic locations such as rural

Support cross-sector collaboration for sharing infrastructure or even parts of it, from private to third sector, fleets to residents, motorbikes to eHGVs.

Facilitate confidential market expressions of interest on LA proposed EV chargepoint locations

Support local servicing and maintenance, as recognized in the holistic place-based approach part of the integrated impact assessments. The scope of that needs defining with any given CPO due to commercial confidentiality. From trialed experience, this means a quicker fault response time is possible, increasing uptime and user confidence, and reducing public complaints to the Council. It also supports local businesses, subject to procurement. Local maintenance can save costs on sending CPO staff to site too, and aids PCPR compliance

As the draft plan identifies, focus on place-based energy transition and not just on transport decarbonisation. That widens the scope for new revenue streams and business models that might be more suited to rural and island areas. I.e. microgrids, battery storage, temporary charging, mobile chargers,

HITRANS feel it needs to be acknowledged that these routes to delivery are more extensive than those planned for more urban and affluent areas that fit existing business models. Change and collaboration both require **time** to work well and **deliver quality solutions** and whilst some of these actions are included in the draft implementation plan, there is not mention of the additional time and flexibility funding programmes require to achieve these mitigations, particularly for medium term energy actions.

and island communities and lower income neighbourhoods in urban areas?

More information

To ensure that everyone who drives cars and vans has access to the right type of public charger in the right geographical location to suit their needs, future private sector investment will need to incorporate less commercially appealing charge point infrastructure locations than have so far been developed.

Ways to improve commercial viability already identified include: addressing the increases in standing charges for grid connections, reducing network connection costs, the inclusion of renewable electricity in the UK Government's Renewable Transport Fuel Obligation and the use of multi-modal and multi-energy locations to combine modes of travel or different types of energy generation on one site.

Please use the box below to provide us with your views

Q4. Are there specific barriers or opportunities related to the rollout of public EV charging across Scotland you would like to highlight that haven't been covered in the Vision Implementation Plan?

Please use the box below to provide us with your views

Consumer Scotland's research suggests that access to home charging is a key factor supporting EV adoption. On island locations, there is a significant barrier with getting organisations to fit the smart chargers required for this. Bulk organisation facilitates that work but again, takes time.

Cost and time to repair vehicles on islands is not mentioned. Distance to garages, recalls costs and ferry policy on carrying EVs with faults all impact this.

Maintenance SLAs do not currently work well in remote, rural and island settings. As identified in the holistic place-based IIA, maintenance needs further consideration.

Q5. Do you agree or disagree with the actions in this draft Implementation Plan and the key stakeholders they are attributed to?

- Agree
- Disagree

More information

The plan includes 15 short and medium term actions which are aligned to the five themes of the public charging Vision. Key roles for stakeholders are set out in the following areas:

- Public charge point operators must continue to invest in public EV charging, powered by renewables, to meet the needs of a growing number of users.
- Electricity Distribution Network Operators must support growth in public charging and enable the use of clean renewable energy.

The actions are welcome but in addition we'd like to see these addressed:

Statutory duties don't include the provision of EV charging and when the network is loss making, resourcing it and for example analysing open source data is not a sustainable activity for Councils without support. This impacts the planning refusal for loss of paid parking in order to make room for EV charging bays too. Perhaps quantifying this loss would highlight the problem. Action 2 and 3 HITRANS suggest should also name Scottish Government as responsible partners too.

Concession contracts do not work for loss making sites, so the plan should not rely on this type of contract.

Collaboration, increasing shared data, new business models and mapping of multi-modal, multi-energy locations required for rural and remote charging means change and takes time and flexibility. This needs to be reflected in the funding conditions for those regions.

Reliability figures across the CPS network does not reflect the experiences of remote rural and island locations, this needs regional analysis, perhaps through the IIA

PCPR Reliability exemptions and the reporting requirements for them need clarifying and widely publicising

Location based data- it would be good to reference the progress made here ie Lenza tool, SSE tools, Field Dynamics ownership data on NEVIS,

PAS 1899 is not Europe wide so a quality that goes beyond UK regulations might enable more chargepoint manufacturers to comply

There is due to be a maintenance skills shortage and this will particularly impact remote, rural and island areas. Promotion and financial support for ESP would be welcome

Clearer guidance on the integration of local energy into EV charging- policy, barriers, opportunities etc

More transparency on how the EVIF fund is targeting support for remote and rural areas, as per previous answer

Transport Scotland

- to enable investment in public EV charging infrastructure.
- The UK Government will use reserved powers on vehicles, energy and EV charging to support the continued the development of EV charging and a wider sustainable transport system.
- The National Electricity System Operator, Ofgem and Consumer Scotland also have important roles to play.

Alongside these partners, the Scottish Government will continue to convene stakeholders to monitor the market, enable private investment, confirm the use of clean renewable energy and ensure EVs and infrastructure support a wider sustainable transport system.

Please provide additional information

Q6. Are there any key stakeholders in the delivery of public EV charging that you believe should have greater prominence in the Implementation Plan?

More information

The Implementation Plan allocates primary stakeholder responsibility for the majority of the actions to either local authorities or charge point owners / operators. This reflects the importance of these organisations / businesses in the most fundamental areas of the roll out of public charging infrastructure; the planning process for installation of charge points and the right type of chargepoint in the right place with a robust operating and maintenance system to maximise customer experience.

Please use the box below to provide us with your views

RTPs , as they have a regional overview of transport.

Key renewable energy generators that can provide off grid energy

Alternative financiers ie GFI amd Community benefit experts

Scottish Government -although they are referenced throughout the plan, HITRANS would like a clear indication that this provision is like other utilities such as water, electricity, etc, and that if that EV charging network should fail temporarily or permanently in places, Scottish Government would have the ultimate responsibility to ensure people have access to provision

Q7. Are there any key aspects of the consumer experience of public EV charging that you believe should have greater prominence in this document?

More information

The availability and accessibility of charge points where people need them is critical. Due to the Scottish Government's legacy of early investment in the public EV charging infrastructure and rapidly increasing private sector investment, Scotland has one of the most comprehensive networks in the UK. We recognise that this expansion must continue across Scotland, particularly in areas where the commercial viability argument isn't as strong, such as rural and island communities as well as urban areas without access to off-street parking.

The barriers to island EV uptake are not fully understood. In particular, affordability and practicality of EV ownership needs analysis, including import costs for EVs, higher than average car use, higher than average energy bills, maintenance costs, smart meter installation support, etc

Transport Scotland

The Scottish Government worked with the British Standards Institute (BSI) in 2022 to develop the PAS 1899 (Electric Vehicles Accessible Charging Specification) standard. This industry standard provides specifications for the installers and operators of public EV charging infrastructure to ensure a more accessible and inclusive charging system across Scotland, and the UK as a whole.

The UK-wide Public Charge Point Regulations 2023 aimed at improving the consumer experience of public EV charging, came into force in November 2023 and were phased in during 2024, with the requirement that all public charge point operators maintain 99% reliability over their whole network introduced in November 2024.

Whilst at present EVs typically may have higher upfront costs, they tend to be less expensive to own than petrol and diesel vehicles, once whole life costs such as maintenance are considered. The affordability of EV charging, including public EV charging, has a significant impact on relative affordability of EV ownership.

Please use the box below to provide us with your views

Q8. Is there any other feedback you would like to provide on the draft Implementation Plan?

This is a really useful document and there has obviously been a lot of consideration of rural and remote provision, partly through the Integrated Impact Assessments. HITRANS highlight a few points below:

Need for wider sustainable transport system NTS@, Topic R15

If island stakeholders need consulting, additional time is needed on the delivery programme to understand and then cater to requirements

Holistic Place-based Approach for Energy Systems

The VIP assessment recognises that the ICIA does point out that this policy may need to include additional consideration of on-going maintenance requirements for charging points. Again, if the maintenance is not business as usual with CPOs, this requires time to work through and solve.

Affordable public charging infrastructure

There is no mention of island or rural affordability to have the EVs that require the infrastructure, which is key to a sustainable network.

Whilst other assessments identify that currently, the cost of transport on islands is much higher, relative to income, than in the rest of Scotland. Owning a car can be seen as the solution in these instances, however, for low-income families, the cost of car ownership may push them into poverty, due to maintenance costs and higher fuel prices

Additional assessment findings

Analysis of the CA9 in the ICIA finds restrictions but concludes no significant impact on islands, economic prosperity, unique social challenges, island infrastructure or natural environment and biodiversity. There needs to be more transparency on this conclusion as it seems contradictory to findings.

In summary, HITRANS find this a very useful document. However, as the EVIF fund supports the delivery of the Vision, this implementation plan would have been much more impactful if it had come whilst EVIF SEPs were developed, when there was a paradigm shift in Scottish EV charging network operations and procurement.

One of the key requests is that more time and flexibility is given to rural, remote and island areas to implement the mitigations identified, and for contingency plans to be more transparent if there were market failure.

views

