

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


14 March 2025

As set out in 'A Network Fit For The Future', we welcome the ambition of having a well-designed, comprehensive, convenient network which is accessible for all, especially disabled users of EV charging infrastructure. We do not have an opinion on the level of private sector investment required to grow and sustain the electric vehicle (EV) charging network in Scotland. But we understand that significant private sector investment is required to enable this growth. This would be utilised alongside public funding, with the latter supporting those areas where private investment is not viable.

It would be important here to ensure that there is an equitable provision of charging infrastructure and charging tariffs. Otherwise, there could be a risk that reliance on a 'for profit' model leads to investment surging towards profitable locations. At worst, this could leave behind and neglect less economically attractive areas, which are crucial to be supported and invested in, if there is to be a fair transition to Net Zero. For example, in consumer research commissioned by Consumer Scotland, qualitative research with EV drivers found that many rural drivers avoided public charging completely due to the cost (and variation of cost) in public charging (YouGov, 2024).

Fuelling an EV costs more, on average, than the petrol or diesel equivalent. Recent research from the AA indicates that those reliant on public chargepoints have to absorb costs which are two-to-three times the price (on average) of home charging (AA, 2024). The current affordability of operating an EV is a particular issue for some disabled people in Scotland as well as the rest of the UK.

There are around 1.5 million people in Scotland living with a disability (DWP, 2024a). And at the UK level, there are as many as one in four people with a disability. Research we have funded estimates there will be 2.7 million disabled drivers in the UK in 2035. Of these 2.7 million, it is estimated up to 1.35 million, or 50 percent, will be at least wholly or partially reliant on public charging infrastructure, meaning they will need to charge their vehicle away from their home (Ricardo, 2020). This has negative financial implications for disabled people.



In general, disabled people and their families face additional costs to maintain the same quality of life as non-disabled people. In terms of household costs, Scope's latest Disability Price Tag data, indicates that disabled households need on average an additional £1,010 to maintain the same living standards as non-disabled households (Scope, 2024). A household with a disabled member is more likely to be low income in comparison to a non-disabled household (Transport Scotland, 2023 & DWP, 2024b). Whilst the median household disposable income is £34,500 (ONS, 2024), our data indicates that more than half of Motability Scheme customers live on an income of less than £30,000 per annum.

In consideration of vehicle running costs, there will be at least 1.35 million disabled people in the UK who will be reliant on the public charging network. And they will need to pay 20 per cent VAT to charge their vehicles, compared with five per cent VAT for home charging. On the issue of VAT, we do not have a position on this ourselves, but we note there have been significant calls from the manufacturing sector for the UK Government to cut VAT on public EV charging to help make owning an EV fairer and more attractive.

Disabled people are less likely to own their own home and are more likely to be renting (through social housing, for instance). And off-street parking availability is typically more limited in this arrangement, meaning that having a domestic, residential chargepoint is less likely (Ricardo, 2020). Therefore, some disabled people face an unavoidable cost penalty.

Motability Scheme customers can have a home chargepoint installation included as part of their lease (if they have access to off-street parking). But almost half of our customers throughout the UK (circa 400,000) cannot have a home chargepoint installed. They are completely dependent on the public charging network. To make it easier for customers, Motability Operations introduced Motability Go Charge. This provides access to over 50,000 chargepoints from over 20 operators in one mobile app. Nonetheless, disabled users are more likely to be negatively financially affected by the costs for on-street charging.

Further evidence on costs is provided from data on Motability Scheme customers' use of public EV chargepoints in Scotland. For our customers, fuelling their vehicle is the only direct cost they have to bear. The other direct costs (servicing and maintenance) are met by the Scheme as part of the universal, comprehensive offer provided by Motability Operations. Where servicing and maintenance for an EV is expected to be


less expensive than for a petrol/diesel vehicle, the costs savings are used to reduce the typically higher advanced payments that EVs require.

Having only the cost of fuel to factor in enables our Scheme users to directly compare the cost per mile for charging with the cost per mile for fuel. This can be a disincentive to customers to transition to EVs. See table below. Data from Motability Scheme drivers' usage of public EV chargepoints in Scotland (in 2024) shows that, across over 160,000 charging sessions, the average for all speeds of charge was significantly higher than petrol or diesel which is 78p kWh. This is the equivalent to over £2 per litre according to research cited by Consumer Scotland (2024).

Connector Speed	Total Sessions	Average Cost per Charge (inc. VAT)	Average Tariff	Average Charge kWh	Average Charge Time (mins)
Rapid	65,954	£21.03	£0.78	26.84	44
Ultra Rapid	52,297	£23.81	£0.78	30.46	37
Fast	32,654	£12.73	£0.57	22.31	162
Slow	9,351	£14.40	£0.57	25.48	283
Total	160,256	£19.86	£0.74	27.02	80
Source: Motability Operations – 2024 data on public EV charging usage					

Because public charging has a higher cost per mile than petrol/diesel fuel, it is a commonly stated reason for Motability Scheme customers to resist making the transition to an EV on their lease renewal. For example, in a survey of Scheme customers in October 2024, who were coming to the end of their lease (i.e. with four months remaining), 60 per cent stated they would not choose an EV when renewing (N=1,1584).

We have a concern that making the personal shift to choosing an EV could be unattractive for drivers because of fuel costs, potentially prolonging the transition. Other issues, such as range anxiety and the lack of accessible chargepoints, compound this for disabled drivers. In a worst case scenario, EV charging prices could



make motoring unaffordable for those in low income households, especially those who do not have the benefit of off-street parking.

Disabled people who choose to use the Motability Scheme are paving the way for the mass adoption of EVs and are some of the first people in Scotland to adopt EVs. Over 7,000 Motability Scheme customers in Scotland have already made the transition to EV, but it must work for everyone across the country, especially those with mobility needs. We want to ensure that they and other disabled people are not left behind in the transition to EVs. Therefore, it is important that the Scottish Government creates a supportive environment where public and private sectors can work together to enable a smooth transition to a zero carbon transport future.

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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?

In principle, we believe that it is possible to scale up rapidly with a combination of public and private sector investment to meet the minimum target of 26,000 chargepoints by 2030. We note the role which Scottish public investment plays already, such as the recent £10 million follow-on investment provided by the Scottish National Investment Bank to FOR EV, Scotland's only private EV chargepoint operator (SNIB, 2024). Enabling the creation of over 1,700 EV chargepoints across the UK it builds on a joint venture between FOR EV and the South of Scotland Enterprise (SOSE). It illustrates the types of partnerships which can be made between public and private sectors to grow and sustain a public EV charging network at scale, and at pace, to meet the needs of the growing number of EVs in Scotland.

Whatever investment approach is taken to achieve this, it will be important to ensure there is a strategic overview on where investments are made so that the benefits of driving EVs can be had by all. Through the Draft Implementation Plan, we understand that local authorities' EV infrastructure Strategy and Expansion Plans will be the basis of identifying current local and future EV infrastructure requirements. But as Transport Scotland's vision acknowledges, a "one-size fits all" approach is not appropriate for Scotland's public charging network.

For example, some people will have a greater dependence on car use in different places, like rural areas, which comprise 98 per cent of Scotland's landmass with around 17 per cent of the population living there (Scottish Government, 2023). Disabled people also have a dependence on cars. It is their most popular form of transport because it is typically the most accessible transport mode for them (Transport Scotland, 2021 & ncat, 2024). As we have explained elsewhere in this submission (see Question 7), this is due to current transport provision (in both public and private modes) inadequately catering for the needs of disabled people.

We have also explained (see Question 1) that disabled people's socio-economic circumstances mean they are more likely to live in low income households compared to non-disabled people (Transport Scotland, 2023). So, there is a possibility that



unfettered reliance on private sector investment could reduce or exclude the installation of infrastructure in places where disabled people live and want to travel.

This is in acknowledgement that Charge Point Operators (CPOs) are private businesses who require their investments to be profitable enough for them to install chargepoints. Irrespective of whether infrastructure investment is made from private or public sources, it will be important that it is spread appropriately to include low income areas and rural areas where disabled people live and/or want to travel to. It will also be important to target this investment at those low income areas where Motability Scheme users tend to be more heavily concentrated. 56 per cent of Scheme customers live in bottom 4 deciles of income (with only 10 per cent in the top two deciles for income) according to the Scottish Index of Multiple Deprivation (SIMD).

Due to the three year maximum vehicle age in the Scheme, lower income Motability Scheme users are expected to need to transition to EVs earlier than lower income non-Motability Scheme drivers. We need installation of charging capacity in those lower income areas faster than an outside commercial analysis may suggest. Ideally, such investment would be prioritised within the next three years to support Scheme lease renewals in 2028. Furthermore, chargepoints need to be accessible to all so that the UK's transition to Net Zero emissions is fully inclusive.


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Q3. How would you approach the challenge of encouraging public charge point operators to invest in more marginal, lower traffic locations such as rural and island communities and lower income neighbourhoods in urban areas?

The Draft Implementation Plan recognises the importance of ensuring that areas which could be commercially unattractive, such as low-income neighbourhoods, rural and remote locations and islands, do not miss out on the installation of EV charging infrastructure required to make Scotland's public charging network accessible to all.

A challenge for those delivering the Plan will be securing the optimal amount and mix of public charging infrastructure. But this will require a focus not just on coverage, but also on ensuring that infrastructure is accessible to all drivers, including disabled people. Disabled drivers live and travel across all areas of Scotland, including routes and locations where journey distances can be longer, and access to essential services depends on reliable transport. If accessible charging is not built-in from the outset, disabled drivers are likely to be disproportionately affected, reinforcing transport inequalities.

In lower-income urban areas, disabled people, who are more likely to face financial challenges in their households, must have equitable access to EV adoption. Disabled people are more likely to have to depend on on-street charging, and even public car park chargepoints. So, they need to have charging options that work for them. For example, over half (55 per cent) of Motability Scheme customers do not have the ability to charge off-street at their homes (Motability Operations, 2025). And, as explained elsewhere in our submission (see Question 1), those disabled people reliant on public charging face a financial penalty every time they charge their EV because of the disparity between public and home charging VAT rates.

Currently, the lack of accessible chargepoints is a major barrier for disabled drivers, with standard charging bays often unsuitable for wheelchair users or those requiring additional space to enter and exit their vehicles. Incorporating dedicated, accessible EV bays into chargepoint rollout strategies would not only improve provision for disabled people but could also support overall network expansion by increasing chargepoint utilisation in these areas.



Where public funding is used to support the establishment of chargepoint infrastructure, clear accessibility requirements, aligned with PAS 1899, have been established by the Scottish Government, which we welcome. It is our view that every chargepoint should be accessible by 2030 so that the transition to Net Zero emissions is fully inclusive. Furthermore, accessibility improvements, such as ensuring that Blue Badge bays are equipped with chargepoints, can help drive investment by broadening the user base. This can help ensure that disabled drivers (who are more likely to rely on public charging) are not excluded from the transition to EVs.

The rollout of public chargepoint infrastructure across Scotland and the wider UK is accelerating rapidly. According to ChargeUK, a new public chargepoint is installed every 25 minutes (2024). While this progress is essential for meeting Scotland's target of 26,000 chargepoints by 2030, it also presents a critical challenge. If accessibility is not prioritised now, a significant proportion of chargepoints could be installed without meeting the needs of disabled drivers. Retrofitting inaccessible infrastructure is costly and inefficient. Embedding accessibility requirements, such as those set out in PAS 1899, from the outset is the only way to ensure an inclusive, future-proofed charging network that works for everyone.

The Plan highlights the need for investment in lower-traffic locations, but this must be balanced with meeting the needs of all potential EV users, including disabled people. Without a concerted focus on accessibility, there is a risk that disabled people in lower-traffic areas will be disproportionately disadvantaged in Scotland's EV transition. An accessible EV charging network is a long-term investment. The transition to EVs must work for all drivers, and a failure to provide accessible chargepoints could create new barriers to transport equity.

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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 this document?


As Scotland moves towards a low-carbon future, ensuring that the transition to electric vehicles (EVs) is accessible to all must be a priority. The rollout of public EV charging infrastructure presents both challenges and opportunities, especially for disabled drivers. Without a strong focus on accessibility, significant numbers of disabled people risk being excluded from this transformational shift in transport.

Public chargepoints must not only be available but also be functional and usable for all drivers, including those with disability impairments and accessibility needs. While the introduction of the UK's accessible charging standard (PAS 1899) has been a step forward, ongoing research and engagement with disabled drivers highlights persistent infrastructure challenges which must be overcome. In tandem, high-quality data and transparent information are essential to empower disabled people to make informed choices about EV adoption and charging options. These are further illustrated below.

The accessibility of chargepoint infrastructure

As the Draft Implementation Plan states, "parking bays and the EV chargepoints located at those parking bays need to be designed for use by disabled users". And despite the introduction of an accessible public charging standard for the UK in 2022 (PAS 1899), a significant barrier to chargepoint infrastructure for disabled people remains its general accessibility. This is an issue which is an inhibitor to EV adoption. For example, in a survey of Motability Scheme customers in May 2024, a quarter (26 per cent) stated that a better public charging network would be needed before they could commit to leasing an EV (N=1,129).

To understand the barriers disabled people face when using EV chargepoints we have conducted and commissioned extensive research. Barriers include built environment issues such as kerb height, particularly the lack of dropped kerbs around chargepoints. General unsuitable parking arrangements also cause a problem for disabled people. When charging their vehicles, there are difficulties for disabled people around the height, weight and manoeuvrability of charging cables. The force required to attach the connector to the vehicle is also an issue. Moreover, the poor visibility of information screens and instructions are also inhibitors (RiDC, 2020).



Our most recent research on this issue was conducted in July last year. Disabled people with experience using public chargepoints, took part in an online survey about EV charging (Motability Foundation, 2024). Whilst the sample was relatively small (N=150), its findings continue to reflect barriers repeatedly raised by disabled drivers.

- Overall, half (49 per cent) of those who charged their vehicles at a public chargepoint rated their experience negatively (with 23 per cent stating it was ‘very poor’ and 26 per cent stating it was ‘somewhat poor’).
- Conversely, over a third (36 per cent) had a positive experience (with 10 per cent stating it was ‘very good’ and 26 per cent ‘somewhat good’).
- A further 13 per cent stated their experience was ‘neither good nor poor’ and two per cent responded, ‘don’t know’.

The top three issues for respondents were space around the vehicle, movement and plugging in of charging cables, and the payment process.

Space around the vehicle

60 per cent of all EV users said that they experienced challenges related to space around the vehicle. For wheelchair users this was a particular issue. One said, “Most EV charging parking spots are not disabled bays, so [they are] not wide enough to use my wheelchair”.


Another issue was not having enough space to fully open a car door, which can limit or prevent disabled people accessing their vehicles: “There is virtually no space between bays so accessing and getting out of car is very difficult if another vehicle is parked”.

Movement and plugging in of charging cables

38 per cent of all EV users stated they had experienced challenges related to the movement and plugging in of charging cables. This included the weight of cables presenting physical challenges, “The cables are very heavy, and they hurt my joints. Lifting it out the car is too difficult.” Conversely, cable lengths can also be too short.

Payment process

29 per cent of all EV users had experienced challenges related to the payment process. This included having to have multiple apps on their phones to make chargepoint payments. Different apps could be needed in different locations. Besides this, there were challenges around making payments in different conditions (such as



adverse weather), including when there was inadequate phone signal. Functionality and the fragmentation of the payments system were also raised.

To address these accessibility challenges, the PAS 1899:2022 Accessible Public Charging Standard (PAS 1899) is currently undergoing a review, which has been jointly sponsored by the Motability Foundation and the UK Government, through the Office for Zero Emission Vehicles (OZEV). To do this a technical working group has been convened by the British Standards Institution (BSI). As well as disability groups a key member of the group is the Scottish Government.

The minimum requirements of PAS 1899 will be updated and will tackle issues such as cable weights, particularly of higher speed chargers, and the connection forces required to initiate charging. The review will also address on-street charging whose quality can be highly variable due to differences in the built environment, as well as the different charging methods applied.


Also, the technical working group is working on challenges related to chargepoint manufacturing standards. Most Charge Point Operators (CPOs) do not manufacture their own hardware. And of those that do, they will have to procure components globally. This means there is considerable reliance on supply chains which source and provide charging infrastructure components from all over the world. The consequences are that CPOs find it very difficult to ensure that their chargepoint hardware (for example, the height of payment terminals and screens) and software meet all the minimum requirements of PAS 1899. The group is expected to publish revised guidance for PAS 1899 in the latter half of 2025.

Without action to address the challenges and barriers to EV chargepoint accessibility, significant numbers of disabled drivers risk being excluded from this generational shift in transportation. And the transition to EVs will only be successful if it works for disabled people.

Using data and information to improve accessibility

The Plan raises several challenges concerning data with accompanying actions. These include actions to monitor the rollout of public EV charging across Scotland (STA 15) and also to review local public EV charging provision via open-source data (MTA 3).

To support these actions Motability Operations is willing to assist by providing anonymised location data, which is open source, for all Motability Scheme drivers, to



Scottish local authorities and Transport Scotland. The supply of Motability Scheme driver data (inclusive of those leasing internal combustion engine vehicles and also electric vehicles) is something which has been previously provided and funded by Motability Operations via the Cenex NEVIS platform. Whilst Motability Operations will continue to provide driver data to Cenex, the agreement for local authorities to have access to this expires in March 2025. Nevertheless, we are open to providing the same data to an alternative Open Data platform, should this be requested.


We also believe that there should be focus regarding the provision of accessible information to disabled drivers themselves. As more chargepoints are installed, it is crucial there is open, high-quality data on charger availability, operational status, pricing and accessibility for disabled people to be able to make informed decisions about their charging options. For this to happen, it is acknowledged that there needs to be widespread adoption of PAS 1899's minimum requirements as a starting point. Showing disabled people where they can find accessible chargepoints is vital to their adoption of EVs. Once they can be made aware of which chargepoints meet PAS 1899, the next step is the provision of open, accessible, comprehensive chargepoint data which increases choice.

The Motability Foundation has called for the UK Government to consider how the open data standard, the Open Charge Point Interface (OPCI), could be improved by requesting CPOs to provide certain kinds of accessibility information to consumers with accessibility needs. The availability of information, like this, could help drivers match their needs and preferences to the infrastructure in their vicinity. For example, is the charging space suitable for a wheelchair accessible vehicle? Is the height of the information/operation screen suitable for someone using a wheelchair?

Motability Operations is beginning to make such information available to Scheme users via its new Go Charge app.¹ As well as finding chargepoints and managing charging and payment, the app includes crowd sourced reviews. These user generated reviews, based on the real-world experiences of disabled drivers, enable them to share firsthand knowledge about how accessible a chargepoint is with their peers. Such user feedback can provide useful accessibility insights and tips.

Building user data like this can help inform policy, as well as operational issues and Motability Operations would be willing it share its user research with Transport Scotland. This would primarily be of benefit to disabled drivers who are not Motability

¹ For further information on Motability Go Charge see: <https://news.motability.co.uk/scheme-news/public-charging-motability-go-charge/>




Scheme users. But it would not just benefit disabled people, it could benefit everyone. For example, older people and those travelling with young children can also struggle with charging their vehicles because of heavy cabling and/or the limitations of space around a vehicle. This is why we believe that every chargepoint should be accessible by 2030 so that the transition to Net Zero emissions is fully inclusive.

References

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


We agree with the actions, as set out in the Draft Implementation Plan, and agree with the key stakeholders earmarked for their delivery. The Plan outlines a clear, structured approach to expanding and improving Scotland's public electric vehicle (EV) charging network to enable the widespread adoption of EVs, thereby supporting progression towards Scotland's net-zero targets.

Ensuring this is based on high-quality, accessible infrastructure must be a priority if this transition is to be equitable for everyone. In particular, improving quality standards for EV chargepoints, especially in relation to accessibility, is right to be underpinning the Plan's implementation. While progress has been made, such as through the development of PAS 1899:2022, further action is needed to ensure that disabled drivers are not left behind. Strengthening the role of accessibility standards, engaging with expert stakeholders, and driving the adoption of best practice will be key to delivering a charging network that is fit for all.

Quality standards for EV infrastructure

We strongly support the principle of developing and agreeing quality standards which go beyond UK regulations (STA 5), such as the Public Charge Point Regulations 2023. As well as public chargepoint owners and operators, and local authorities, we feel it would be important that the Motability Foundation also be engaged to support in this work.

As co-sponsor of the PAS 1899:2022 Accessible Public Charging Standard (PAS 1899), along with the UK Government's Office for Zero Emission Vehicles (OZEV), we have supported the establishment of the first dedicated standard for accessible public chargepoint infrastructure in the world. Developed by the British Standards Institution (BSI) and published in October 2022, PAS 1899 provides the charging infrastructure industry with a clear specification of the minimum accessibility requirements for chargepoints of different speeds and in different environments. Designed to apply to all chargepoints, it provides a specification of chargepoint features including: kerb height, bollard spacing, the weight of equipment, the height of connectors and the space around the chargepoint.




Since PAS 1899 was launched there are indications that stakeholders are beginning to take a more proactive approach to accessibility. Despite the industry remaining fragmented, consumers are beginning to have greater choice and Charge Point Operators (CPOs) are becoming more focused on the user experience of their chargepoints. Nonetheless, whilst the reception from the industry has been positive, it is now approaching the third year since PAS 1899's launch and there are still no chargepoints in the UK which are fully PAS 1899 compliant.

It is important to stress that PAS 1899 was fast-tracked to provide a minimum accessible standard for all types of chargepoint and was created in the context of an industry which needed urgent guidance. In contrast, a full British Standard takes double or triple the time to develop and would require all stakeholders to pay to access it. Due to sponsorship from the Motability Foundation and OZEV, PAS 1899 is free to access.

As is often the case with new standards developed rapidly, its implementation in practice over the past two years has revealed practical challenges and unforeseen barriers that need to be addressed to ensure its requirements can be fully met. One particular challenge has been that some minimum requirements (such as heights of payment terminals and screens, cable weights, the requirement for dropped kerbs and so on) are very difficult to meet for CPOs.

One of the reasons for this is because they are dependent on supply chains which source and provide charging infrastructure components from all over the world. And these may not be compatible with PAS 1899 requirements. Another challenge is due to some CPOs and local authorities not understanding or misinterpreting various aspects of PAS 1899, such as treating it as the very highest level of accessibility rather than the minimum standard.

To address the various issues raised and ease the path to widespread adoption, the Foundation and OZEV have jointly sponsored a review of PAS 1899 and its implementation since 2022, with the aim of updating its minimum requirements. This is being taken forward via a technical working group convened by BSI. As well as the Scottish Government, the working group includes representation from disabled people's organisations (DPOs) and charities, the UK Government, national transport bodies, the chargepoint infrastructure industry, local authorities and accessible design experts. On the basis of this work, PAS 1899 is anticipated to be re-published in the latter half of 2025.



We are acutely aware that PAS 1899 provides a minimum standard of accessibility – and a voluntary one at that. The current reality is that a PAS 1899 compliant chargepoint may not be usable by all disabled people, particularly those who use wheelchairs. Whilst there will be an improved, updated version of the standard publicly available later this year, we are also calling on the UK Government to mandate CPOs to conform with the minimum requirements of PAS 1899. To do this, we support a phased approach towards mandation: to achieve 20 percent of public chargepoints being PAS 1899 compliant by 2027; then rising to 50 percent by 2030; and then 70 percent by 2035.

In the context of this, we welcome the Scottish Government’s position on requiring that a reasonable proportion of existing, off-street public chargepoint sites must comply with PAS 1899. Nonetheless, it is important to clarify what a ‘reasonable proportion’ is, in practical terms. We look forward to understanding more about this.

Also, we welcome that all charge points at new, off-street public sites must be in compliance with the standard. And again, we welcome the requirement that grantees of Scottish Government funding have to demonstrate that they will meet the requirements of PAS 1899.

Given the looming 2030 phase out date for the sale of new vehicles with pure, internal combustion engines, it is crucial that accessible charging infrastructure is available for disabled people. Without action to improve EV chargepoint accessibility, significant numbers of disabled drivers risk being excluded from this epoch-defining shift in transportation. And the transition to EVs will only be successful if it works for disabled people. This is not only a matter of fairness but of societal progress — our transition to a net zero future must be inclusive of all.




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

We agree with Transport Scotland, regarding those organisations identified as responsible stakeholders, for all the short-term and medium-term actions under the Draft Implementation Plan's five themes. The focus here is on those who will be central to developing the public charging network in Scotland. But we would also like to take this opportunity to reinforce how important it is to ensure that stakeholders, especially those who will rely on EV infrastructure, are engaged and involved throughout the delivery of the Plan where it is appropriate. This will be fundamental to its successful delivery.

Our vision is to build a future where all disabled people have the transport options to make the journeys they choose and the Motability Scheme is the main way we provide access to transport for disabled people. In Scotland, 84,000 people benefit from the opportunity to lease a new car or Wheelchair Accessible Vehicle (WAV) from the Motability Scheme. And of these, over 7,000 have already made the leap to EVs. Their lived experiences provide essential insights. This includes exposing real-world barriers, which could render public charging infrastructure inaccessible, if not properly addressed from the outset. To build a truly inclusive public EV charging network, disabled people should be engaged at all stages of policy development, infrastructure design, and implementation. Otherwise, there is a risk that accessibility will be treated as an afterthought rather than a core design principle.

This can be achieved through sustained collaboration with disability charities such as the Motability Foundation, as well as Disabled People's Organisations (DPOs), which offer crucial expertise rooted in direct experience. However, engagement must extend beyond consultation. It should be a structured, ongoing partnership that informs decision-making at every level. Such an approach will not only help policymakers anticipate challenges before they arise but will also ensure that Scotland's charging infrastructure is fit for purpose for the widest possible range of users.

Beyond these practical benefits, embedding accessibility into EV infrastructure from the outset will drive wider improvements in usability and convenience for all drivers in Scotland. Disabled people have diverse needs, all of which need to be accounted for in infrastructure planning. But a charging network that works for disabled drivers will, by extension, be more user-friendly for everyone, whether it is parents with pushchairs,



older drivers, or those with impairments and conditions which are not long lasting. The transition to EVs represents a once-in-a-generation opportunity to design an inclusive transport system. Missing this would not only disadvantage disabled drivers but could also undermine the broader goal of making EV adoption accessible to all.



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


The consumer experience of public electric vehicle (EV) charging is critical to ensuring a smooth and equitable transition to EVs, particularly for disabled drivers who can face unique challenges in accessing charging infrastructure. This response highlights two key aspects that warrant greater prominence: improving the overall consumer experience and cross-pavement charging. These are short term actions under the Draft Implementation Plan where the Motability Foundation and Motability Operations could provide Transport Scotland with expertise, guidance and advice in support of their aims. Below we illustrate our understanding and expertise of each.

Improving the overall consumer experience

We welcome the intention of the Scottish Government and Consumer Scotland to convene key stakeholders to identify measures to continue to improve the consumer experience of EVs and the infrastructure which supports them (STA 7), with the aim of improving consumer confidence as Scotland progresses towards the mass adoption of EVs now and through to the 2030s.

We understand this initiative will bring together organisations to share evidence and insight on consumer behaviour and experience. Our view is that it would be beneficial to have representation not only from consumer groups but also from industry and disability organisations too. Including these perspectives will provide a more holistic understanding of the consumer experience, ensuring that insights reflect not just user needs and preferences but also the practicalities of product design, infrastructure development, and accessibility considerations.

Both the Motability Foundation and Motability Operations have considerable expertise to offer here. We oversee and operate the largest EV fleet not only in Scotland but also the UK. From this we have a wealth of quantitative (such as user data) and qualitative (such as customer feedback) which can be explored to provide insight. We also produce valuable consumer insight and understanding of disabled peoples' experiences due to the ongoing research, monitoring and evaluation we conduct and commission. We support others, including Disabled People's Organisations (DPOs), charities, community and other third sector groups, to conduct research via direct commissioning and grant funding to understand the challenges disabled people face



in transportation. The evidence generated supports the development of innovative solutions to improve accessibility.


Furthermore, the Motability Foundation has developed and realised the concept of an Evidence Centre focusing on disability and transport strategy. Launched in 2023, ncat (National Centre for Accessible transport) is funded by the Motability Foundation but is fully independent. Its aim is to make transport accessible for all. ncat works directly with disabled people, disability organisations, as well as transport providers and policy makers, to develop accessibility solutions derived from applied research.

We continue to raise awareness amongst disabled drivers and their families about the benefits of switching to EVs. For example, in September 2024, Motability Operations hosted several free motoring events, including the 'Big Event' in Edinburgh, to help disabled people learn more about EVs. Held over two days it provided thousands of visitors with opportunities to test drive EVs, learn about EV charging, as well as understand what the Motability Scheme has to offer. Through our research, we illustrate some of the challenges faced by disabled EV users in regard to infrastructure and also automotive vehicles.

Improving the accessibility of electric vehicle infrastructure for disabled people

As well as the Motability Scheme enabling access to affordable electric vehicles for disabled people, we are driving progress to ensure the infrastructure supporting EVs is equally accessible. The number of public chargepoints required to be installed by 2030 is a minimum of 26,000 in Scotland. The Foundation believes that every chargepoint should be accessible by 2030 so that the UK's transition to Net Zero emissions is fully inclusive.

However, recently published research, which Motability Operations supported, illustrates disabled drivers' current consumer experience of EV charging. Euan's Guide, a Scottish-based charity which aims to improve accessibility for disabled people, conducted the largest access survey in the UK of disabled people (N=6,665). When asking those, who had experience of public EV chargepoints about their experience, the majority (58 per cent) gave negative responses (either 'bad' or 'very bad'). Those who had a positive experience ('satisfactory', 'good' or very good')



amounted to 41 per cent. And a quarter (26 per cent) of those selecting a positive response option only had a 'satisfactory' experience (Euan's Guide, 2025).²

The National Audit Office's recent report on public chargepoints for EVs (December 2024), which the Motability Foundation contributed evidence to, stated that "rollout of public chargepoints to date has not met the needs of drivers with disabilities". What is more, "there is a risk that their needs will remain unaddressed as chargepoint numbers increase."


We have conducted and commissioned extensive research to understand the barriers disabled people face. For example, research conducted by Motability Operations has revealed that 72 per cent of customers on the Scheme lack confidence about public charging, and more than 3 have range anxiety. The Motability Foundation has identified that when charging their vehicles, disabled people can have difficulties around the height, weight and manoeuvrability of charging cables and the force required to attach the connector to the vehicle. The poor visibility of information screens and instructions are also inhibitors. For example, these may not be viewable and/or usable for those in wheelchairs. There are also challenges associated with the built environment. Unsuitable parking arrangements also cause a problem for disabled people, as do kerb heights and the lack of dropped kerbs around chargepoints (RiDC, 2020). See our response to Q4 for further information about these issues.

Improving the accessibility of electric vehicles for disabled people

Journeying by car is the most popular mode of transport for disabled and non-disabled people in Scotland (Transport Scotland, 2023). But, for many disabled people, car travel is a necessity. For example, 67 per cent of Motability customers rely on their vehicle as the only car in their household. This is because disabled people are far less likely to be able to rely on public transport than people without disabilities.

Research conducted by the Motability Foundation has identified a 'transport accessibility gap' for disabled people (Motability 2022). This is due to a significant disparity in transport patterns and frequencies they experience compared to non-disabled people. A key reason for this gap is because current transport provision (in both public and private modes) does not adequately cater for the needs of disabled

² The following findings are based on responses from those who provided a positive or negative rating and excludes the 66 per cent who selected 'Not Applicable.' Consequently, percentages have been rebased to reflect only the valid responses.



people. For many disabled people, car travel, including the ability to independently refuel and recharge, is an essential part of daily life.


As so many disabled people and their families are reliant on car travel to support their independence, freedom and well-being, it is imperative to understand and explore the challenges faced by disabled drivers and passengers using private transport. This is especially the case given that we are on the cusp of technological transformations which will reshape the transport landscape, not least the transition to EVs. This transition needs to consider and 'design-in' accessibility from the outset to ensure that disabled people benefit from the shift to greener modes of transport. The Motability Foundation has and is exploring accessible vehicle design for electric vehicles and also, looking further ahead, autonomous vehicles.

On accessible vehicle design, we have funded the Energy Savings Trust (EST), an independent organisation working to address the climate emergency, and separately Designability, a charity specialising in the field of human centred design, to explore the challenges in designing EVs for disabled consumers, including wheelchair accessible vehicle (WAV) users.

EST's (2023) research identified specific EV design challenges around battery placement and charging socket positioning. The conversion and adaptation of EVs face common problems as battery placement, which is usually under the floor of the vehicle, restricts space to convert or adapt, sometimes to the extent that this is not possible for vehicles. EST also found that, in general, disabled consumers' requirements are not considered sufficiently enough in the production of mass-produced vehicles.

Designability (2024) has taken this forward by exploring how vehicle design could be improved to make cars more accessible and inclusive for all. This involves testing concepts with disabled people and industry with the aim of creating feasible solutions which meet disabled people's needs using the principles of person centred design.

It has conducted research with around 1,400 disabled drivers and passengers, with a wide range of impairments, and has identified the challenges faced by disabled people using cars and WAVs. These include difficulties getting in and/or out of cars, preparing to travel, driving, and storing luggage and mobility equipment (such as wheelchairs and walking aids). In operating vehicles, many disabled people find it difficult to use controls because they are hard to reach or locate. The user interface and/or touch screen can also be complex and confusing.



Designability continues to be grant funded by the Motability Foundation and is creating a series of accessible design principles and demonstrator prototypes, via user engagement research. Its research aims to inspire the automotive industry to design inclusive cars with accessibility and flexibility embedded as standard for disabled people.

We have also been exploring the potential of connected and autonomous vehicles to transform mobility for disabled people. TRL Limited, a leading transport research consultancy, and the Research Institute for Disabled Customers (RiDC), a national charity which provides independent research to create accessible and inclusive products and services, received grant funding from the Motability Foundation to understand the needs, perceptions, and challenges faced by disabled people in regard to the development of inclusive automated transport technologies and services.


TRL's and RiDC's joint research identified potential benefits, such as the provision of door-to-door services which could overcome some existing travel barriers for disabled people. There might also be time savings and cost reductions due to taking more direct routes and not having the labour costs of needing a driver. There are also challenges with a nascent transport mode like this, such as safety concerns. For example, without human assistance, how could a wheelchair user be secured in a vehicle's restraint system? (TRL & RiDC, 2024).

We already work closely with Consumer Scotland to share consumer insight derived from our research and also management information from the Scheme. We would welcome the opportunity to continue to work with Scotland's leading consumer advocacy body and the Scottish Government to ensure that disabled people can navigate the transition to EVs, remain mobile and retain their freedom and independence to travel when and where they want to.

Our investment and partnerships to improve transport accessibility for disabled people, reflects the strength of our resolve. We will continue to champion the voices of disabled people, innovate with purpose, and collaborate with government and industry to ensure that no one is left behind in building a truly accessible transport system for the future.

Cross pavement charging

We strongly support the development of guidance for cross-pavement charging (STA 1) and would welcome the opportunity for Motability Operations to contribute its technical expertise, advice, and guidance to the SCOTS network. We see a significant




opportunity for knowledge exchange across the UK, allowing for the cross-fertilisation of ideas and the sharing of best practices. Without this there could be a risk that guidance is developed in isolation, leading to duplication of effort, wasted resources, and potentially sub-optimal outcomes. Therefore, it will be important that there are links with local authorities in other parts of the UK. In stating this we acknowledge the pivotal role local authorities play in approving and regulating cross-pavement charging installations.

Motability Operations has considerable expertise to offer here. Operating the largest EV fleet in the UK, we understand the needs of disabled drivers in making the transition to EVs, as well the barriers they face in doing so. For an inclusive transition to EVs, accessible and unobstructive cross-pavement charging solutions must be made available. Yet current solutions raise significant accessibility challenges for disabled users, as seen below. Furthermore, these solutions can be inconvenient and hazardous for pedestrians, especially disabled pedestrians. Trailing a charging cable across a public footpath to access the benefits of home charging can cause various potential obstructions, not least from the EV cable itself.

We know that having no access to home charging is a barrier to EV adoption for disabled people leasing a vehicle through the Motability Scheme. This is a significant issue because around 55 per cent of Motability Scheme customers in Scotland do not have access to off-street parking (Motability Operations, 2025). They have to rely on the use of public chargepoints, which may not be positioned close to their homes. A lack of access to on-street, home EV charging is a considerable barrier to EV adoption among disabled drivers.

Research from a forthcoming report on cross pavement charging products by Motability Operations (2025), has highlighted various challenges with existing products. Interactive workshops with Motability Scheme customers were used to conduct product testing and a number of challenges were identified for disabled users.

- Stretching, bending and kneeling – this is particularly an issue when using products which require cable insertion at the ground level or having to reach above head height.
- Strength and dexterity - with some charging equipment heavy to use, this can cause issues, for example, when holding and managing the flex of the cable whilst charging.

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- Stamina and endurance – using some products can require extended periods of exertion. And the length of time taken to use some products can exacerbate the effects of other impairments.
 - Challenges related to wheelchair use - the positioning of cross-pavement products is particularly important to ensure access to a chargepoint.

Motability Operations is actively working to ensure there is fair access to home charging for our Scheme's customers, so they can benefit from more convenience, greater cost savings, as well as easier accessibility. In doing this we are also conscious that the accessibility of pavements must be safeguarded for all pedestrians, especially for disabled pedestrians. As well as conducting product testing, we are committed to supporting the development of solutions to address the issues we have identified.

We are seeking to make sure that disabled customers, without off-street parking, are not excluded from the transition to Net Zero. In doing this, we have engaged with local authorities, manufacturers and designers, and will continue to do so. We believe:

- that manufacturers of cross-pavement products should design products that are accessible for use by disabled people; and
- that local authorities should ensure that, once available, accessible cross-pavement products are approved for use by disabled drivers.

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

Scotland's transition to a low-carbon transport system must work for everyone. The Draft Implementation Plan provides a route map for delivering the Scottish Government's vision for an expanded and improved public electric vehicle (EV) charging infrastructure. This also aligns with the Scottish Government's strategic objective to reduce car journeys by 20 per cent. However, achieving this target will require a better understanding of the optimal amount and mix of public charging infrastructure to support communities across Scotland.

For many disabled people, cars are not a luxury but a necessity, often due to a lack of viable alternatives. While reducing car use is a priority, it is crucial to recognise that disabled drivers must have reliable, accessible EV charging infrastructure to support their mobility needs. At the same time, if sustainable alternatives like shared micromobility services are to become a realistic option for more disabled people, these services must be designed with accessibility in mind from the outset.


This response highlights the need to ensure that the enlargement of Scotland's public charging network and the shift towards shared and active travel do not inadvertently exclude disabled people. By embedding accessibility into transport policy and investment decisions, Scotland can ensure that its transition to Net Zero is both sustainable and inclusive.

Ensuring the that public chargepoints are accessible and available for disabled people

The Plan implements the vision for Scotland's public electric vehicle charging network, as set out in, 'A Network Fit For The Future'. This vision clearly sets out the importance of public charging infrastructure within Scotland's wider transport system.

It will need to support the disparate needs of EV drivers, including disabled people, living in communities, whether in bustling cities like Glasgow and Edinburgh, where dense urban environments particularly require accessible on-street charging. And it needs to support those in smaller towns, like Dumfries and Inverness, where infrastructure caters to both local residents and regional travellers.

There are also remote areas to consider, such as the Highlands and Argyll. These are places where long distances and harsh weather demand reliable charging infrastructure. The infrastructure must also support those living on or visiting



Scotland's islands, like Orkney and the Outer Hebrides, where transport links, ferry connections, and energy resilience are key considerations for daily living.

As the vision paper acknowledges, the expansion of public charging infrastructure will require a better understanding about the right composition of public charging infrastructure needed to support and connect communities across Scotland's varied landscapes. In determining this, it is crucial that the expansion of infrastructure works for disabled people.


We are aware of disabled drivers' concerns about the current driving range of EVs, compared to internal combustion engine vehicles, leading to 'range anxiety'. Research conducted by Motability Operations indicates that more than three in five Scheme drivers have a fear about not being able to reach an EV chargepoint before their car's battery depletes (Motability Operations, 2024). Coupled with a widely shared concern about the accessibility of public chargepoints, this has the potential to put a brake on disabled people making the transition to EVs. It reinforces the absolute necessity to have the right amount and mix of chargepoints, which are accessible and available for disabled people.

Increasing use of shared micromobility services

The Plan contributes towards the Scottish Government's broader intention to promote sustainable transportation as laid out in its National Transport Strategy. The Plan refers to a strategic objective to achieve a 20 per cent reduction in car kilometres by 2030. This reflects the requirement for a Sustainable Travel Hierarchy, which prioritises transport modes based on their sustainability and environmental impact. In this case, walking, wheeling, cycling, public transport, and shared transport options will be given precedence over single-occupancy private car use.

As an imminent target, reducing the reliance on cars for everyday journeys could bring some concerns for disabled people, as well as some opportunities. Regarding concerns, we have stated elsewhere in our submission (See Question 7) that disabled people have a dependence on cars – it is their most popular mode of transport – largely because current transport provision (in both public and private modes) does not adequately cater for their needs. Therefore, it could be challenging to expect some disabled people to reduce their reliance on cars and switch to active travel modes of transportation (assuming their impairment(s)/condition(s) would permit this).

There could be considerable opportunities and benefits for disabled people to use shared micromobility (SMM) modes of transport, including e-scooters and e-bikes.




This emergent transport mode is rapidly growing but still in its infancy. The potential benefits for active travel could be numerous for disabled people and include: providing a means of gaining independence to develop newfound freedom; improving health conditions through exercise opportunities and being out in the fresh air; and providing spontaneous travel opportunities compared to public transport. To understand more about the hidden potential of SMM services to improve transport for disabled people, the Motability Foundation commissioned research into the benefits and barriers experienced by disabled people using or trying to use SMM services in the UK (RiDC & CoMoUK, 2025).

It found that whilst SMM services have experienced rapid growth amongst non-disabled users, in a survey of 782 disabled people, only 10 percent (81) had used any kind of SMM vehicle. Despite this, the research also identified a latent demand for SMM services. Over half (53 percent) of survey respondents (inclusive of users and non-users) felt that SMM services could improve the lives of disabled people (n=781).

Making SMM services inclusive and viable for the large proportion of the 1.5 million disabled people in Scotland, will require a collaborative and multi-stakeholder approach working with the UK Government, Scotland's local authorities, SMM operators, regulatory bodies, and not least, disabled people themselves. It is vital that disabled people are engaged and involved from the outset.

Improving the SMM offer for disabled people will take time. Developing greater accessibility will require investment from the private sector and legislation from government. In their report, RiDC & CoMoUK suggested a first step would be to develop greater accessibility into the SMM vehicle options available. For example, seated e-scooters and three-wheeled kick scooters, could improve accessibility for disabled people. Other research indicates a considerable barrier to take-up. In a survey of 1,195 disabled people conducted by the National Centre for Accessible Transport, micromobility vehicles were rated the least accessible of any transport mode by disabled people (ncat, 2024).

We are committed to building a robust evidence base that not only informs policy and industry practice but also ensures that disabled people's voices are central to decision-making. This approach is key to identifying barriers, developing innovative solutions, and driving meaningful change in transport accessibility. As part of this commitment, the Motability Foundation is preparing to fund a pilot project to raise awareness of current, shared micromobility (SMM) services among disabled people. This initiative will provide disabled people with the opportunity to test vehicles firsthand, helping to



build confidence and unlock the benefits these services can offer. Set to launch in summer 2025 the project aims to generate valuable insights which will inform the development of more inclusive SMM options.

As experts in this field, we would welcome the opportunity to share our findings and collaborate with Transport Scotland to ensure that inclusive, shared micromobility plays a meaningful role in Scotland's sustainable and accessible transport future.

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