



Draft New London Plan: Response from LEVC

ABOUT LEVC

LEVC (formerly LTC) manufactures the world's only purpose-built, mass-market range extended electric taxi. The electric taxi draws on decades of automotive heritage, having built the iconic London taxi in Coventry for almost 70 years.

LEVC's electric taxi is manufactured at a new facility at Ansty, near Coventry, purpose-built with a £325m investment by LEVC's parent company Geely. Ansty is the first new car plant to be built in the UK in over 10 years, the only car plant in the UK dedicated to electric vehicles (EVs) and will also house Geely's global research and development (R&D) hub for EV technology, exporting innovation worldwide.

LEVC's taxi is built on an adaptable platform which will pave the way for it to manufacture other electric commercial vehicles following the taxi's UK launch. The electric taxi will also be sold in cities across Europe and beyond, meeting the global demand for safe, clean, accessible taxis and demonstrating UK leadership and advantage in the commercial vehicle segment.

ABOUT THE NEW ELECTRIC TAXI

LEVC's electric taxi is called TX. TX uses eCity technology which combines a small petrol generator (known as a range-extender) with a class leading battery and proven electric powertrain. eCity technology gives drivers a zero emissions range of more than 80 miles on pure electric, and a combined range of 377 miles with its small petrol generator.

TX is purpose-built and designed as a taxi from the ground up. It is not a van which has been converted for use as a taxi. As such it provides the optimal driver and passenger experience along with the iconic design heritage associated with the famous London Black Cab. It has a 25ft turning circle to handle urban streets with ease.

TX is instantly recognisable and easy to identify as genuine and therefore a safe licensed taxi. It is a high-quality, modern vehicle, reflecting the image of the UK cities where it operates. It is reliable, dependable and has a long lifespan of 15 years, reducing end of life waste and rate of replacement.

The cab also retains its renowned accessibility features. It has a new retractable integrated ramp making it quicker and easier for passengers in wheelchairs to travel in a forward facing position. Other accessibility features include induction loops for hearing aids as well as contrasting grab handles and seat edges for the partially sighted. The passenger cabin carries 6 rather than 5 passengers.



EXECUTIVE SUMMARY

LEVC welcomes the opportunity to comment on the Mayor's Draft New London Plan.

For the London Plan to anticipate future transport needs and demands, LEVC believes it is essential to prepare for a rapid uptake of electric vehicles, especially taxis and commercial vehicles.

Transport for London's own targets state that there will be 9000 electric taxis on the streets by 2020 and that all London taxis will be electric by 2033. These vehicles will all need adequate and timely access to 50kW+ rapid electric vehicle chargepoints.

The vans that currently deliver goods and support London's service economy are also beginning to transition to electric variants. In order for these fleets to be able to carry out their role they will also need access to 50kW+ rapid electric vehicle chargepoints.

And all drivers of electric taxis and commercial vehicles who live in London will need to be able to charge their vehicles at home on 7kW+ on-street electric vehicle chargepoints, even if they do not have access to off-street parking.

Given these requirements, necessary for the uptake of electric taxis and commercial vehicles, LEVC would encourage the London Plan to be more ambitious in its targets retrofitting the existing car park estate and highways with electric car charging infrastructure, and on the requirements for new roads and parking spaces. The Mayor may wish to consider using, exercising or gaining powers to deploy a more strategic London-wide electric vehicle chargepoint network.

Finally, LEVC asks the Mayor to urgently withdraw his definition of "active provision for electric vehicles" and "passive provision for electric vehicles" and replace it with a better-understood definition that developers and electric vehicle equipment installers understand.

The definition "actual socket" is extremely unhelpful and does not give developers or installers any guidelines as to what they should install. It risks them bearing additional cost that they will then have to re-install correct infrastructure.

LEVC suggests consulting with the Office for Low Emissions Vehicles' guidance on electric vehicle charging infrastructure or UK EVSE, but would prefer a definition such as 'at least a 7kW Type 2 or J1772 AC wall-mounted or floor-mounted chargepoint'.

CONSULTATION QUESTIONS

LEVC has commented on the relevant draft definitions, KPIs and policy proposals below.



Definitions:

- The Mayor should urgently refine his definitions of “active provision for electric vehicles” and “passive provision for electric vehicles”.
- The phrase “actual socket” is extremely unhelpful and does not give developers or installers any guidelines as to what electric vehicle charging point they should install.
- It risks them bearing additional cost that they will then have to re-install correct or up to date infrastructure.
- LEVC suggests consulting with the Office for Low Emissions Vehicles’ guidance on electric vehicle charging infrastructure or UK EVSE to seek an agreed definition of electric vehicle charging point for the purposes of the New London Plan.
- LEVC would suggest a definition such as ‘at least a 7kW Type 2 or J1772 AC wall-mounted or ground-mounted chargepoint’.

KPIs:

- LEVC is disappointed to see that when measuring modal share and the shift towards public transport to 80% by 2041, the measures will exclude taxis.
- Taxis are for many Londoners and visitors with mobility impairment are the only safe and reliable means of reaching their destination in London.
- LEVC would like to see taxis considered as public transport for the purposes of the Mayor’s 2041 target.

Policy SI3 Energy infrastructure:

- LEVC agrees that reliable electricity supply is essential for the functioning of any modern city and believes that energy preparedness is essential for a sharp transport modal shift towards electric vehicles.
- The Mayor has set out in his Transport Strategy that he would like to see 9000 electric taxis on the street by 2020 and for all taxis to be electric by 2033. In order for this to be achievable the Mayor will need to engage in a large-scale rolling deployment of rapid 50kW DC electric vehicle chargepoints across London, supported by a secure electricity supply.

Policy T1 Strategic approach to transport:

- LEVC is disappointed to learn that the Mayor’s strategic target of 80 per cent of all trips in London to be made by foot, cycle or public transport by 2041 will exclude taxi travel.
- Taxis are for many Londoners and visitors with mobility impairment are the only safe and reliable means of reaching their destination in London.
- LEVC would encourage any shift away from car travel to other forms of transport to consider that London’s taxis need the current and future network to support their ability to operate, specifically by being able to pick up and drop off passengers with ease.

Policy T2 Healthy Streets:

- LEVC supports the Mayor’s overall objectives to deliver healthy streets but would note that London’s taxis need the current and future road network to support their ability to operate, specifically by being able to pick up and drop off passengers with ease.



- The Plan may wish to be more ambitious in its plans for the road network, including for example, zero emission streets and zero emission taxi ranks within the Healthy Streets plan.

Policy T3 Transport capacity, connectivity and safeguarding:

- LEVC supports the Draft New London Plan's commitment to providing sufficient and suitably-located land for the development of the current and expanded public transport system to serve London's needs.
- This should specifically include space and power supply for 50kW+ rapid electric vehicle charging points and space for taxis to rank and stop.
- However LEVC would take issue with the assumption in table 10.1 that the cost of installing electric vehicle infrastructure is low.
- Even if the majority cost of the installations are borne by the private sector or local authorities the Mayor must still consider a range of installation and maintenance costs of the area around the chargepoint and the electricity connection to it as a medium cost.

Policy T5 Cycling

- LEVC asks the Mayor to consider that expansion of the cycling network, including the delivery of a London-wide network of cycle routes should be mindful of cycle lanes which inhibit the ability of passengers to enter and exit taxis from the roadside. They should be particularly mindful of taxi passengers of limited mobility of those using a wheelchair.
- Current and future cycle lanes should be built with appropriate places where it is possible for taxis to collect and drop off passengers.

Policy T6.1 Residential parking

- LEVC fully supports the commitment that all residential car parking spaces must provide infrastructure for electric vehicles, and the commitment that at least 20 per cent of spaces should have active charging facilities, with passive provision for all remaining spaces.
- Many taxi drivers are London residents who need on-street residential charging points as well as the public rapid charger network in order to charge their vehicles so they can drive in zero emissions mode.
- However, LEVC would urge the Mayor to urgently review and improve his definition of active and passive provision for charging facilities to assist developers and installers.

Policy T6.2 Office parking

- LEVC supports the commitment for all operational parking to provide infrastructure for electric or other Ultra-Low Emission vehicles, including active charging points for all taxi spaces.
- However, LEVC would urge the Mayor to urgently review and improve his definition of active charging points to assist developers and installers.

Policy T6.4 Hotel and leisure uses parking

- LEVC agrees with the provisions set out for taxis in this Policy, particularly that operational parking must provide infrastructure for electric vehicles, including active charging points for all taxi spaces.



- However, LEVC would urge the Mayor to urgently review and improve his definition of active charging points to assist developers and installers.

Policy T7 Freight and servicing

- LEVC would like to see a clearer definition of freight vehicles in this section of the draft plan – specifically to include light commercial vehicles (LCV). For the purposes of the measures set out in the plan, ‘freight’ should apply to N1 category vehicles and above.
- LEVC agrees with the Plan’s commitment to reduce emissions from freight. LEVC’s forthcoming production of a range-extended electric LCV will greatly help reduce emissions from van travel across London.
- LEVC also fully supports other measures to reduce freight emissions such as sustainable last-mile schemes and the provision of rapid electric vehicle charging points for freight vehicles, and would note that a dedicated 50kW+ rapid charging network dedicated to taxis and commercial vehicles is essential to the successful operation of these vehicles in London.
- Where possible, LEVC would encourage the Mayor to exercise powers to deploy a 50kW+ rapid charging network which is strategic and planned for current vehicle demand and future uptake of electric vehicles.

Policy T9 Funding transport infrastructure through planning

- Where possible, LEVC would encourage the Mayor to exercise powers to deploy a 50kW+ rapid charging network which is strategic and planned for current vehicle demand and future uptake of electric taxis and commercial vehicles.
- He should also specifically charge the Mayoral Community Infrastructure Levy (MCIL) to secure funding towards 50kW+ rapid electric vehicle charging infrastructure.
- Boroughs in conjunction with the Mayor and Transport for London should be obliged to provide a pathway to installing 50kW+ rapid electric vehicle charging infrastructure along highways, in car parks, and in other suitable locations.
- Boroughs in conjunction with the Mayor and Transport for London should also be obliged to provide a pathway to installing 7kW+ fast electric vehicle charging infrastructure for residents who do not have access to off-street parking, including drivers of taxis and vans, to charge their vehicles overnight.

FURTHER INFORMATION

For further detail on any of the information included in this document, please contact:

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