



NFCC
National Fire
Chiefs Council

The professional voice of the
UK Fire & Rescue Service

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Department for Transport
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Sent to: streetmanager@dft.gov.uk

11 April 2024

Dear Street Works Team,

National Fire Chiefs Council (NFCC) response to Street works access: electric vehicle chargepoint operators consultation

NFCC welcomes the opportunity to respond to this consultation which seeks views on changing legal access for street works carried out by electric vehicle (EV) chargepoint operators (CPOs).

NFCC is the professional voice of UK fire and rescue services (FRS) and is comprised of a council of UK Chief Fire Officers. This response was drafted by NFCC's Strategy and Policy Team in consultation with NFCC subject-matter experts.

NFCC supports UK ambitions to meet net-zero greenhouse gas emissions by 2050 and the need to ensure that adequate infrastructure is in place to support the growing uptake of EVs.

We understand the benefits of granting EV CPOs the right to carry out street works using a permit rather than a licence. However, as the consultation identifies, EV CPOs are not currently regulated in the same way as permit qualifying statutory undertakers currently are. This could have implications for ensuring fire safety risks are taken into account when EV CPOs are installed.

NFCC therefore welcome the proposal made in the consultation that new guidance is produced to support EV CPOs and Highways Authorities (HAs) in street works operations, to complement existing regulations and guidance.¹

In the production of any new supporting guidance for EV CPOs and HAs, we recommend the following fire safety risks are considered:

1. **Location of chargepoints:** Chargepoints should not be positioned near a fire hydrant, and must not hinder FRS access to buildings and essential facilities such as rising main inlets.

¹ [Regulations: electric vehicle smart charge points - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/regulations-electric-vehicle-smart-charge-points) and [Covered car parks: fire safety guidance for electric vehicles - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/covered-car-parks-fire-safety-guidance-for-electric-vehicles)

2. **Fire water drainage:** EVs are powered by lithium-ion batteries which can cause severe and explosive fires when they become faulty, damaged or are exposed to extreme heat. Thermal runaway creates dense smoke and toxic vapours and gases such as carbon monoxide. EV fires present new challenges for FRS as extinguishing an EV fire requires large amounts of water and the fire can reignite hours or sometimes days later. Fire water that is contaminated with chemicals from battery fires is dangerous to the environment; polluting a water source is an offence under the Water Resources Act 1991 and polluting a sewer is an offence under the Water Industry Act 1991. As such, appropriate fire water drainage systems must also be in place for contaminated fire water in the event of an EV fire.
3. **Quality of materials and installation:** This will include the quality of the materials used in the installation, as well as the installation of the chargepoint itself, and any related junction boxes. FRS have responded to several incidents where a junction box has exploded and caught fire.² A regular inspection/quality assurance mechanism for EV chargepoint installations should be in place to ensure public safety.
4. **Safety information for the public:** There should be clear public information regarding EV chargepoint fault reporting. EV chargepoints should also provide information about the warning signs of an EV fire and what to do if an EV fire is suspected or happening.
5. **Safety incident planning:** Plans need to be in place to ensure that EV chargepoints can be isolated and safely disconnected in the event of an incident, such as a collision or an adverse weather event which results in harsh environmental conditions which could compromise chargepoint safety.

We welcome the opportunity to respond to this consultation and would welcome further engagement from Government officials as policy and associated guidance continues to be developed.

Yours sincerely,



Dan Daly
Director of Continuous Improvement
National Fire Chiefs Council

² [Regent Street: Shoppers flee electrical fire beneath pavement - BBC News](#)
['Exploding' pavement shocks shoppers with 'black debris and smoke' coming from manhole | UK | News | Express.co.uk](#)