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Consultation Response Form

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This strategy sets out a vision for electric vehicle charging in Wales.

It provides a strategic framework for how charging infrastructure will be installed in order to facilitate the uptake of electric vehicles, supporting Wales' transition to net zero, whilst embedding the Well-being of Future Generations Act to ensure that charging is provided equitably. We would like to hear from you to shape the charging infrastructure system needed across Wales.

It is clear that the need for electric charging infrastructure will rapidly increase. The decisions we make now will shape Wales' energy and transport system for the future.

A Vision for Charging in Wales

By 2025, all users of electric cars and vans in Wales are confident that they can access electric vehicle charging infrastructure when and where they need it.

Q1: To what extent do you agree with the vision?

| | | | | | |
|----------------|-------------------------------------|-------------------|--------------------------|----------------------------|--------------------------|
| Strongly agree | <input checked="" type="checkbox"/> | Agree | <input type="checkbox"/> | Neither agree nor disagree | <input type="checkbox"/> |
| Disagree | <input type="checkbox"/> | Strongly disagree | <input type="checkbox"/> | Don't know/ no opinion | <input type="checkbox"/> |

Please provide your comments:

We are supportive of this ambitious vision of an equitable distribution of EV chargepoints across Wales. Meeting this vision will require comprehensive investment within the next few critical years if we are to effectively address the climate emergency. Section 5 of the consultation document recognises the fact that high numbers of new chargepoints will need to be installed at pace. We would like to see more targets put in place to track the delivery of this vision transparently.

The focus on improving the confidence of all users rather than simply increasing the number of chargepoints is welcome. Confidence in access and a high quality, reliable user experience underpins the ability and willingness to switch to EVs¹. Recent research undertaken by the Behavioural Insights Team (BIT) and the Transport Research Laboratory (TRL), '*Driving and accelerating the adoption of electric vehicles in the UK*'², found that while access to adequate infrastructure played a crucial role in promoting the adoption of EVs, awareness raising, access to accurate information, and affordability were fundamental prerequisites.

Underpinning this strategy should be the provision of impartial and expert advice to support households to make informed decisions regarding the purchase of EVs. As a first step, the Welsh Government could broaden its pre-existing home energy and local authority advice service to include advice on EVs and chargepoints. This is an approach already underway in Scotland

¹ This has been recognised by the Competition and Markets Authority who are in the process of undertaking a market study to address issues around accessibility and the user experience of the EV charging network. See here: <https://www.gov.uk/cma-cases/electric-vehicle-charging-market-study>
²https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/914111/driving-and-accelerating-the-adoption-of-electric-vehicles-in-the-uk.pdf

through the Home Energy Scotland (HES) advice service³ which Energy Saving Trust manages on behalf of the Scottish Government. HES is a world-leading service and with the relatively recent addition of sustainable transport advice alongside the well-established home energy focus, callers can now get more holistic energy saving advice. HES advisors can direct clients to support services such as the Transport Scotland new and used Electric Vehicle Loans⁴. Around 90% of callers who contacted HES to speak about transport found the advice useful while nearly 70% felt that the advice provided had helped in making decisions about how to travel more sustainably. When asked whether the advice had influenced them to take transport related actions around 10% of callers who got in touch to speak about transport had been influenced to purchase an EV.

Our view is that to capitalise on the growing interest in electric vehicles a priority area in the next five years must be the creation of effective incentives for EV uptake, whether through loans, scrappage schemes, grants, EV car clubs or other mechanisms.

Addressing the first two major barriers to EV adoption identified through the BIT and TRL research (ie knowledge and affordability) can help to create a virtuous cycle where growing charging demand caused by informed and supported citizens purchasing more EVs improves chargepoint profitability and private sector investment.

Some groups will prove more challenging to engage with and may have additional barriers to EV uptake. We support the reference to this within the consultation document and believe consideration must be given now to how the full range of communities and businesses can be supported in an equitable and fair way to benefit from the positive transition to widespread EV usage.

Q2: Users of electric vehicles access charging through charge points provided by private sector operators. What actions should the public sector take to ensure that sufficient chargepoints are deployed, in the right locations, across Wales to meet the demand described in this strategy?

Please provide your comments:

³ <https://www.homeenergyscotland.org/make-greener-choices-at-home-on-the-go/>

⁴ <https://energysavingtrust.org.uk/grants-and-loans/electric-vehicle-loan/>

As landowners, highway authorities and local area experts, local authorities (LAs) will play a pivotal role in the rollout of EV chargepoints in Wales. This will be especially true for households without off-street parking as these chargepoints are most likely to be on public land and tend to be the least attractive to the private sector. This is due to the relatively low profit margin on chargepoint tariffs which is held at a few pence per kWh to keep it close to domestic electricity rates (which is good for affordability and fairness). This, coupled with lower customer turnover, means that these chargepoints tend to not be as attractive to private developers. LAs will need the skills and capacity to meet the challenge of rolling out large numbers of chargepoints in a relatively short time period.

Building the provision of impartial, tailored support for each authority to develop a strategic solution, appropriate for their area and the resources available would be a valuable approach. LAs can collaborate with private sector actors enabling them to procure with confidence and deliver high quality infrastructure. A recently announced project being undertaken by UK Power Networks⁵ and local councils could offer useful lessons for Welsh LAs seeking public-private partnerships.

Welsh LAs do receive some support through the On-street Residential Chargepoint Scheme (ORCS) managed by Energy Saving Trust on behalf of the UK Government. The Welsh Government could strengthen this approach through greater promotion of the scheme in Wales. Transport for Scotland offer a top-up grant to ORCS to support LAs further, improving the business case for chargepoint investment.

The Welsh Government could also draw on two existing models in creating a support programme tailored to Welsh LA needs. These are:

- The Local Government Support Programme⁶ (England) – funded by the Department for Transport and managed by Energy Saving Trust. This provides tailored one-to-one support to upskill officers so they can develop effective EV strategies. A strong focus of the scheme is improving the understanding of chargepoint network business models and procurement options, helping to establish successful, strategic private

⁵ UKPN project with LAs which seeks to identify 'blackspots' in chargepoint provision and organise competitive tenders to supply these needs. See more here: <https://www.current-news.co.uk/news/ukpn-partners-local-councils-in-bid-to-identify-and-incentivise-priority-ev-chargepoint-deployment>

⁶ <https://energysavingtrust.org.uk/service/local-government-support-programme/>

sector partnerships. This is seen as a key LA support programme in England and is, we believe, a model that would be equally beneficial if adapted to a Welsh context.

- Switched on Towns and Cities Challenge Fund⁷ (Scotland) – funded by Transport Scotland and managed by Energy Saving Trust. This provides in-depth feasibility studies, assesses chargepoint requirements based on likely demand and identifies suitable sites. It has enabled LAs to access a dedicated funding pot over several years. We recognise that this work is also underway through the WGES with grant money being offered, though at a relatively small scale at this stage.

We support the suggested actions listed on p.34 on “Potential measures to be outlined in the Action Plan include providing a framework for public sector procurement, use of public land, sharing best practice and support to building the capabilities required.” We look forward to seeing the detail of these proposals. The decision to implement the Energy Performance of Buildings Directive for new builds in Wales is also welcome.

We would welcome the public sector fleet decarbonisation support already provided through the WGES being built upon and enhanced. Through our experience delivering successful fleet support programmes⁸ over several decades we have seen how investing in closer engagement with Welsh fleet managers on decarbonisation can deliver results quickly. The Welsh Government should prioritise the delivery of tailored, impartial advice for fleet managers to give them the confidence they need to make new business cases and ultimately make the switch to electric. This will help to ensure adequate depot charging for fleet vehicles. The electrification of fleets strengthens the second hand EV market and demystifies EVs for the general public.

Q3: What barriers do you foresee to the roll out of sufficient charging points across Wales to meet the predicted demand for charging over the next ten years described in this strategy?

Please provide your comments:

⁷ <https://energysavingtrust.org.uk/service/switched-on-towns-and-cities/>

⁸ <https://energysavingtrust.org.uk/service/fleet-support/>

A lack of understanding and awareness of chargepoint technologies and which technologies will be best suited to a given context will hinder investment and the roll-out, whether by LAs, businesses or consumers.

On public charging installation, the biggest challenges will be addressing the LA skill and resource gap (dedicated staff and capital) to create and implement charging plans. LAs need this resource and best practice sharing network in place to be able to find solutions to barriers such as local parking pressures, grid constraints, local political support, street clutter etc, drawing on lessons learnt elsewhere. Leveraging this local knowledge will be essential to deliver a chargepoint network that works for all.

On home charging and chargepoints for businesses (arguably the most important sectors for widespread EV adoption in the 2020s), the critical barrier is a lack of knowledge and understanding. The provision of impartial and expert advice will be essential if this first barrier is to be addressed. This is a conclusion drawn in several recent pieces of research investigating barriers to private rollout^{9,10}. The provision of expert and impartial advice for consumers (perhaps drawing on the successful model adopted by HES) and for businesses (through a continuation of fleet support services) would be a cost-effective approach to increasing EV uptake and chargepoint rollout in homes and businesses.

The congested nature of the grid in some parts of Wales may also prove a challenge, particularly as many of these regions (ie mid-Wales) are rural locations¹¹ where reliance on personal vehicles is highest and will continue to be high even after electrification. The Welsh Government should, together with the UK Government, work with the relevant distribution and transmission companies (Western Power Distribution, Scottish Power Energy Networks, National Grid Transmission, National Grid System Operator) and Ofgem to identify and tackle constraints in Wales. We think that particularly constrained areas and areas of strategic importance should be prioritised. Taking a flexibility first

⁹ Recent Department for Transport consultation into the provision of smart charging. Accessible at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/914111/driving-and-accelerating-the-adoption-of-electric-vehicles-in-the-uk.pdf










¹⁰ TLR research undertaken on behalf of Citizen's Advice to investigate consumer attitudes towards charging. Accessible at:

[https://www.citizensadvice.org.uk/Global/CitizensAdvice/Energy/Smart%20EV%20charging%20-%20What%20do%20drivers%20and%20businesses%20find%20acceptable%20-%20Final%20Report%20for%20Citizens%20Advice%20\(1\).pdf](https://www.citizensadvice.org.uk/Global/CitizensAdvice/Energy/Smart%20EV%20charging%20-%20What%20do%20drivers%20and%20businesses%20find%20acceptable%20-%20Final%20Report%20for%20Citizens%20Advice%20(1).pdf)

¹¹ <https://gov.wales/sites/default/files/publications/2019-10/energy-generation-in-wales-2018.pdf>, p.29

approach should reduce the need to reinforce the grid, which will lower costs for consumers.

Q4: Electric vehicle users are able to charge vehicles at varying speeds as set out in the graphic on page six of the strategy summarised in the table below.

| |  Rapid/Ultra Rapid Kilowatt: 43-350kW Charge time: 15-45 mins |  Fast Kilowatt: 7-22kW Charge time: 1.5-5 hrs |  Slow Kilowatt: <7kW Charge time: 8-12 hrs |
|---------------|--|---|---|
| Home | | |  |
| Workplace | |  | |
| On-street | |  | |
| Destination | |  | |
| On-route |  | | |
| Charging hubs |  | | |

The use of such charging methods is dictated by the users' circumstance. As set out in the Strategy it is expected that charging could occur at home at slow speed assuming access to off street parking otherwise at destinations such as workplaces, car parks, destinations (supermarkets, leisure facilities, public locations, etc.) and on-street if practicable. Rapid/ultra rapid charging would be expected to be used predominantly by those on long distance journeys.

Q4a: Do you have access to off street parking?

Yes No

Q4b: Please estimate your annual mileage

Less than 10,000 miles per year

10,000 to 20,000 miles per year

More than 20,000 miles per year

Q4c: The need for fast charging is expected to quickly increase over the next five to ten years. It is especially important for people who are unable to charge at home (for example due to lack of parking).

Please rate in order of importance (1 to 6) your preferred location to charge an Electric Vehicle should you have access to one now or in the future? If you answered No to Q4a Home charging will rank as 6.

Charging locations

Rank in order 1 to 6 with 1 being most preferable

| | 1 | 2 | 3 | 4 | 5 | 6 |
|--|---|---|---|---|---|---|
| Home charging | | | | | | |
| Fast charging at supermarkets, leisure facilities etc. | | | | | | |
| Charging at the workplace | | | | | | |
| On-street charging | | | | | | |
| Charging at visitor attractions or destinations | | | | | | |

| | | | | | | |
|--|--|--|--|--|--|--|
| Car parks / hub locations e.g. park and ride | | | | | | |
|--|--|--|--|--|--|--|

Q4d: In respect of rapid/ultra rapid charging locations these are influenced by availability of power and land but in general where would you prefer to see these located? Please select most preferable.

In an urban environment

On or as close as possible to the strategic road network

On or as close as possible to the strategic road network with co-located local services if appropriate

Q4e: Do you have any other views in respect of convenient locations for slow, fast or rapid/ultra rapid charging infrastructure?

Regarding slow chargepoints, we would emphasise the need to provide convenient, affordable charging close to homes, especially in places where on-street charging is unviable due to pavement widths, parking pressures or grid constraints etc. This could take the form of new charging hubs or appropriate LA car parks. The majority of charging will continue to happen at home or work and likely through slow charging at these locations for some time to come.

Skewing heavily towards fast chargepoints in all locations may result in the promotion of a charging model that doesn't match people's current behaviours. Fast chargers should be prioritised in locations where people already park their cars for long periods (ie at work, in front of their home). Robust monitoring of chargepoint usage and driver behaviour patterns would be worthwhile as it would give the Welsh Government and LAs the ability to be flexible and adapt the strategy depending on the outcomes of this monitoring.

When making cost comparisons between different types of chargepoint, the vehicle turnover rate must be kept in mind. There is also a point at which the cumulative energy and space requirements of fast chargepoints mean that

fast chargepoints are no longer a cost effective choice for a particular location, and a single rapid chargepoint would be a better option.

It is also worth considering where we are likely to be in ten years. By 2030 we will likely see an increasing number of chargepoints that operate at over 50kW, leading to a service station pattern of EV chargepoint use mirroring how people fill up their ICE vehicles today – though those with home chargepoints will rarely need to make use of this, apart from on longer journeys.

Q5: The strategy (at section 8) identifies 31 key outcomes for future charging in Wales, these are grouped into 4 themes. Do you agree with the key outcomes of each theme identified in Section 8?

1. Total charging provision

Strongly agree Agree Neither agree nor disagree
Disagree Strongly disagree Don't know/ no opinion

2. Quality outcomes

Strongly agree Agree Neither agree nor disagree
Disagree Strongly disagree Don't know/ no opinion

3. Sustainable outcomes

Strongly agree Agree Neither agree nor disagree
Disagree Strongly disagree Don't know/ no opinion

4. Localised benefits

Strongly agree Agree Neither agree nor disagree

Disagree

Strongly disagree

Don't know/ no opinion

Please provide any comments you may have in respect of the 4 themes:

Total Charging Provision

We support the proposed outcomes for slow charging particularly around the need for “education and awareness raising”. Education and awareness raising will be crucial for behavioural change and in providing the confidence to switch to EVs, particularly as most slow chargepoints will be in people’s homes or workplaces. We would welcome an implementation date for the proposal that “All new homes with an associated car parking space will have electric vehicle charging”.

We also support the outcomes related to fast charging but would reiterate the need for local authorities to be supported in helping to efficiently and equitably deploy these chargepoints. We welcome the actions mentioned on p.34 of the consultation document which refers to public sector procurement and sharing best practice (see Question 2). The Action Plan described within the consultation document needs to offer tangible, practical support for businesses and destinations so they understand their options and so capital investment is well-allocated, especially while charging demand might be relatively low in the near-term. Some examples of business and destination-focused support programmes and research are:

- ChargePlace Scotland grants for businesses and,
- SSENs E-Tourism Study in Scotland which sought to predict future EV chargepoint usage at tourist destinations.

We welcomed the recent extension of the UK Department for Transport-funded Workplace Charging Scheme. A Welsh Government top-up of the scheme could help the rollout of fast chargepoints at many smaller businesses across Wales.

Regarding rapid chargepoint rollout, taxis and private hire vehicles are a unique user group and need targeted engagement and dedicated chargepoint provision. This particular need has been identified as part of the Local Government Support Programme in England. We welcomed the particular focus given to taxis and private hire vehicles in Llwybr Newydd where there is a dedicated mini-plan. A similar granular approach to supporting sufficient rapid EV chargepoint access

for the sector in this strategy would be beneficial. Any provision should be linked with changes to local taxi licencing to encourage and then require the transition to EVs.

Quality Outcomes

We support any actions which seek to simplify the charging experience and improve reliability and roaming, without hindering private sector innovation.

We think that LAs would benefit significantly from clear guidance on an appropriate, up-to-date minimum technical standard as part of the procurement process.

Sustainable Outcomes

We are supportive of these outcomes. Once these are agreed upon it must be a priority to ensure that information and appropriate advice is given to stakeholders and the new national standards are effectively disseminated and implemented. The Power Purchase Agreement approach taken as part of Egni Coop's community business model, supported by WGES, should be drawn upon when supplying "All fast and rapid/ultrarapid charging points... by renewable energy (either through tariff/purchasing agreements or local zero carbon solutions".

Localised Benefits

We are supportive of these outcomes, particularly as they lend themselves to supporting community energy projects in line with the Welsh Government Local Ownership of Energy Generation policy statement. In terms of local skills, there could be an opportunity to promote the training/retraining of EV technicians to meet the future demand for EV maintenance. The Institute of the Motor Industry (IMI) qualifications are fast becoming the industry standard in this area.

Q6: What actions do you think would help create a charging experience that is equitable and accessible for people in Wales?

It will be important to recognise the different contexts people in Wales will be using EV chargepoints in, both now and into the future (eg rural vs. urban use, access to off-street charging or not etc). The strategy does discuss these issues but they must remain at the forefront of thinking, particularly when it comes to public investment. This is a point we will also be making in our response to the recently published DfT and OZEV consultation into the consumer experience of

public chargepoints¹² which covers the whole UK.

Awareness raising and the provision of impartial advice among consumers, businesses, and within LAs about EVs and charging must be a priority (see Question 1). Part of ensuring an “equitable and accessible” transition is offering all drivers access to jargon-free, impartial advice to understand what type of chargepoint is suitable for their home or business, and linked information on energy tariffs etc. For example, through:

- o the online and phone support offered by Home Energy Scotland
- o publicity campaigns and public outreach (eg EV experience centre¹³)
- o SME Fleet reviews – to support with determining depot charging requirements

To help ensure equity of provision and a fair transition targeted support for particular groups (eg low income households, those reliant on personal vehicles for work) and regions (eg rural communities reliant on personal vehicles, areas with constrained grid access such as Mid-Wales) should also be delivered.

More broadly, try before you buy schemes¹⁴ and EV car clubs¹⁵ can help to build confidence in EVs and charging infrastructure before drivers commit to an EV purchase.

The consultation document recognises that relying entirely on the market to provide chargepoints equitably for everyone in Wales is unlikely to be successful. We agree, there is a need for public investment in chargepoints in situations where private companies are less likely to invest. We think that this needs to be LA-led where possible so that local knowledge can be leveraged in the delivery of programmes. From the outset, LAs need impartial support with procurement and best practice sharing to help them deliver a chargepoint strategy with equity at its heart, rather than being led purely by commercial viability. We recognise that this presents a significant challenge with many dimensions.

We previously touched on the idea of Welsh Government ‘top-ups’ to existing schemes in our response to Questions 2 and 5. This could allow less profitable sites (due to high grid costs, low turnover in rural locations, or being situated in a less affluent area) to be included in the network from the beginning while still being

¹² <https://www.gov.uk/government/consultations/the-consumer-experience-at-public-electric-vehicle-chargepoints/the-consumer-experience-at-public-chargepoints>

¹³ <https://evexperiencecentre.co.uk/>

¹⁴ New £9m try before you buy scheme from Highways England managed by Energy Saving Trust. Details here: <https://www.gov.uk/government/news/leading-the-charge-on-world-ev-day>

¹⁵ www.arloesigwyneddwlledig.cymru/en/prosiectau/ceir-cymunedol-trydanol/

able to draw on private sector expertise for installations and maintenance, if this is desired by the LA. A Welsh Government top-up grant scheme could offer different levels of grant funding depending on the nature of the location and the desire for further co-benefits such as better connected communities or the promotion of tourism in a given area.

Q7: How do you think Wales might capture the value of investment in electric vehicle charging?

- Progressive rules around procurement and supply chains
- Continuing to prioritise local renewable generation and community projects, utilising the Power Purchase Agreement approach touched on in our response to Question 5.
- Working to upskill the supply chain and invest in training and manufacturing so that more inward investment can come to Wales.

Q8A: Our future work and action planning will be heavily informed by the predicted demand for electric vehicle charging points outlined within this strategy (i.e. increasing numbers of fast chargepoints to between 30,000 to 50,000, and increasing numbers of rapid chargepoints to up to 3,500, over the next ten years), do you agree with these figures?

We support the decision to model future usage based on the 'Leading the Way' Future Energy Scenario, this signals ambition and leadership in addressing the climate crisis. A decarbonisation pathway with this level of ambition will be required to reach net zero.

We identified a potential discrepancy in the consultation document which has made it challenging to draw more firm conclusions about the pathway out to 2035. The S-curve published on p.19 illustrates a "shift to approximately 30% electric vehicles by 2030, and **90% electric vehicles by 2035**" (across the UK as a whole). However, later on p.21 the Leading the Way Scenario is described as pointing to "over **half of all cars are battery electric vehicles by 2035**". Is this discrepancy due to the distinction between 'cars' and 'vehicles', or between hybrids and Battery Electric Vehicles, or new sales and total vehicles? We would welcome greater clarity in this area in the final strategy.

While the 'correct' ratio of rapid/ultra-rapid to fast chargepoints is challenging to predict we feel that there is some scope to increase the proportion of rapid

chargepoints being proposed. The strategy suggests a figure potentially lower than 10% of the total. In Scotland, a little under a quarter of the chargepoints are rapid which appears to be an acceptable proportion.

Robust monitoring of chargepoint usage and driver behaviour patterns would be worthwhile here as it would give the Welsh Government and LAs the ability to be flexible and adapt the strategy depending on the outcomes of this consumer research.

Q8B: Do you hold or do you know of any evidence which would predict different demand?

From EV driver feedback we know that rapid chargers tend to be favoured over fast chargers because they are quick and so don't involve long wait times while vehicles charge. Analysis we have conducted on the ChargePlace Scotland network bears this out. Of the 1200 or so chargers on the network as of the end of 2019, only around 270 of these were rapid, yet they accounted for nearly 60% of the charging sessions and energy drawn. It is likely that as we enter the mass adoption phase for EVs, driver behaviour will change and the desire for a charging experience as close as possible to refuelling an ICE vehicle will lessen. Until this time though the preference for rapid chargers over fast in public settings should be taken into account.

Q9: Any further comments?

Question A: We are under a duty to consider the effects of our policy decisions on the Welsh language, under the requirements of the Welsh Language (Wales) Measure 2011.

We would like to know your views on the effects that the strategy would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English.

What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

Question B: Please also explain how you believe the strategy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favorably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favorably than the English language.

Question C: We have a duty to consider the impact of our policies on people or groups who share protected characteristics.

Do you think this strategy will deliver positive benefits for people who share protected characteristics? If so, which are the most important?

Question D: Do you think the strategy could have a negative impact on some people or groups who share protected characteristics? If so, what are they and how can we prevent those?

Something which the Welsh Government should look to address through the strategy is the lack of guidance or best practice around the design of accessible chargepoint bays and chargepoints for disabled people. This is an issue across the sector and discourages people with disabilities from engaging with electric vehicles and the transition¹⁶. The Welsh Government could produce best practice guidance around the design of chargepoint bays and work with the Department for Transport on an innovation fund to incentivise the design of

¹⁶ <https://www.motability.org.uk/about/news/electric-vehicle-charge-points-lack-accessibility>

more accessible chargepoints.

Responses to consultations are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please tick here: