

Template for written evidence – Electric vehicle charging:

Background

Purpose of the consultation

The [Climate Change, Environment and Infrastructure Committee](#) is considering the Welsh Government's [electric vehicle charging strategy](#).

In particular, the Committee is keen to hear your views on progress against each of the nine actions included in the [action plan](#) that was published in October 2021.

The closing date for submissions is **14 December 2022**.

Providing Written Evidence

The Senedd has two official languages, Welsh and English.

In line with the Senedd's [Official Languages Scheme](#) the Committee requests that documents or written responses to consultations intended for publication or use in Senedd proceedings are submitted bilingually. When documents or written responses are not submitted bilingually, we will publish in the language submitted, stating that it has been received in that language only.

We expect other organisations to implement their own standards or schemes and to comply with their statutory obligation

Please see [guidance for those providing evidence for committees](#).

Disclosure of information

Please ensure that you have considered the [Senedd's policy on disclosure of information](#) before submitting information to the Committee.

This template is available for you to draft your responses should you wish to think on your answers prior to submitting your response. All responses should be submitted via the [online consultation form](#) and not be submitted via email.

Your opinion

The Committee would welcome your views on any or all of the following:

Some helpful things to be aware of before you start answering the consultation questions:

- You do not need to answer every question, only those on which you wish to share information or have a view.
- If you provide any information that you feel is not suitable for public disclosure, please indicate which parts should not be published and give your reasons for this.

1. What are your views on the Action Plan?

The Action Plan set out a fairly ambitious list of targets, with KPIs, to try and bring greater co-ordination to the roll out of EV charging points which was happening in an ad hoc way, driven by commercial considerations. Considerable progress has been made against several of these as outlined below, with actions taking place at local and regional levels as well as national. However, there is still much to be done.

2. What are your views on progress made against Action 1: Charging infrastructure?

The Action Plan KPI for charging infrastructure was to have one public charge point for every 7 to 11 EVs by 2025. According to Zap Map data quoted by Welsh Government (WG), there are currently approximately 1 charge point for every 9 EVs. Therefore, progress appears to be well on course.

During 2022 WG and TfW worked closely with WLGA to promote funding available to councils via the UK Government's On-Street Residential Charging Scheme (ORCS). WG helped bids from several successful councils by meeting the 25% match funding requirement. Consultants were brought in to provide software that helped identify potential, eligible locations and then councils used local knowledge to select specific sites. In the case of Cardiff Capital Region, the councils worked on a collaborative bid. Projects funded under ORCS will now be implemented during 2022/23.

3. What are your views on progress made against Action 2: Optimisation of energy provision?

The KPI for Action 2 was to establish a Connections group. It is understood that such a group is not yet formed but it is still WG's intention to set one up. In the meantime, WG and TfW have been working with the DNOs to reinforce key parts of the electricity network. Councils would not necessarily be on the Connections group but are engaging as and when required with DNOs over grid capacity and other local issues affecting charge point installation.

4. What are your views on progress made against Action 3: Enhanced rapid charging provision?

The KPI here was to have a network of charging forecourts across Wales at approximately every 20 miles of the strategic road network by 2025. WG and TfW have been working to help plug gaps in the network that would not be filled by commercial operators. It is understood that as a result of the work undertaken the KPI should be achieved some two years ahead of the target date, early in 2023. Councils have been involved as the local planning authorities for the sites.

There have been some delays, however, in the planned roll out of rapid charging points, associated with problems relating to grid constraints, supply chain issues, planning permissions and legal agreements (such as leases and wayleaves).

5. What are your views on progress made against Action 4: Welsh quality standards?

The KPI for this action was to have a National Quality Standard in place to be used in public sector procurement by the end of 2021. Whilst it is understood the work has been commissioned, it is not available online at the time of writing. The standard will be useful in providing general guidance but there will still be locally specific issues that will need to be taken into account. Without those standards issues over compatibility of equipment and different payment systems will continue to cause problems/driver anxiety.

6. What are your views on progress made against Action 5: Regulatory facilitation?

A review of policy and building regulations to support EV take-up was to have been undertaken by 2022, according to the KPI for this action. It is understood that a consultation on draft amendments is now planned by WG in the first half of 2023.

For England only, the 2021 edition of Part S of the Building Regulations 2010 have already set out requirements for infrastructure for EV charging: [Infrastructure for charging electric vehicles: Approved Document S - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/94444/infrastructure_for_charging_electric_vehicles_approved_document_s_-_gov.uk.pdf).

7. What are your views on progress made against Action 6: Partnership and collaboration?

The KPI for this action was to establish a charge point operator working group in 2021. It is understood that WG has undertaken market engagement with charge point operators to discuss their plans, but a group has yet to be formed. WG has stated it hopes to have such a group in place by mid-2023.

TfW is planning to develop an EV service desk that would be available to offer support to all bodies concerned. This is potentially a very useful step that will help with co-ordination and consistency across Wales.

8. What are your views on progress made against Action 7: Increase public awareness?

For Action 7 the KPI is to achieve enhanced public confidence in EV charging. Whilst there is increasing evidence of charge points around Wales, there has not been a great deal of publicity. There is online information and Apps are available for EV drivers to identify the nearest charging points. However, there has also been some negative publicity about delays waiting for access or points not working. Channel 4, for example, found that 5.2% of 26,000 public EV chargers they investigated were not working ([Why Are So Many Electric Vehicle Chargers Broken? | The Eco Experts](#)). This is a particular issue for rural areas where there may not be another charge point for some distance, adding to 'range anxiety' associated with EVs.

9. What are your views on progress made against Action 8: Encourage investment opportunity and innovation?

The KPIs for Action 8 were to complete a supply chain and opportunities review by the end of 2021 and to establish a programme to realise opportunities for innovation and investment. It is not known if these specific actions have been completed. However, WG is understood to be developing a procurement framework for use by the public sector, with the aim of maximising supply chain opportunities. It remains to be seen if this will encourage local investment and help to grow local supply chains. At present much of the equipment needed appears to be brought in from wherever it can be sourced as opposed to seeing local companies springing up to meet demand in an area. There may be cost implications in specifying more locally sourced items, which will be a consideration.

10. What are your views on progress made against Action 9: Create synergies?

The KPI here is for charging infrastructure to be considered in all relevant new and emerging local and regional development plans. However, more importantly there was a focus on spatial planning to look for opportunities to co-locate charge points with renewable energy generation. This is a key issue, as ensuring EVs run on clean energy is vitally important to the decarbonisation agenda. If electricity used to power EVs is from 'brown' sources, then the benefits are far more limited. There is still much more work needed in this area.

11. What are your views on the strategy ?

The strategy was useful in pulling together available information on the situation regarding EV charging and what was needed to improve the situation and reduce emissions associated with car journeys.

There have been some significant changes since the strategy was issued. First, UK Government has reduced some of the incentives for purchasing EVs (e.g. restricting eligibility for grant support for the purchase of EVs; ending grants for home charger installation). Secondly, the dramatic increase in electricity costs means that the original advantage of lower running / lifetime costs has been reduced. Thirdly, technology has continued to advance for example, with ever faster chargers available

Whilst equality issues are mentioned in the strategy they are not explored to any great extent. However, EVs are likely to remain out of reach of many households until the second-hand market grows. Where an EV is purchased, home-charging is most cost effective. However, this tends to benefit higher income households with their own driveways and garages (and, potentially, solar panels). Those (often lower income) households dependent on using fast chargers in public locations will end up paying more for their electricity, creating an inverse relationship between cost and the ability to pay. 'Early adopters' of EVs are also more likely to 'get in early' in terms of installing home chargers before grid capacity in an area is reached. This may mean that, even where home charging is a possibility, by the time some households are in a position to buy an EV they may have to wait until network capacity is upgraded.

There is also a tension between the promotion of EVs and the key goal of Llwybr Newydd to encourage active travel. The sustainable transport hierarchy is clear in favouring walking, cycling and public transport over ultra-low emissions vehicles. However, in providing charging points for EVs there is a risk that individuals will continue to choose the car and not really change their behaviour. If the electricity used is provided by green sources it would still result in an improvement in terms of decarbonisation and air quality, but potential gains in terms of activity/health, reduced congestion and improved road safety may not be realised. Unless we see the modal shift desired, the number of public

charge points required as ICE cars are phased out will continue to grow and/or queues to use them will lengthen.

12. Do you have any other points you wish to raise within the scope of this inquiry?

No further comments.