

Senedd Cymru | Welsh Parliament

[Pwyllgor Newid Hinsawdd, yr Amgylchedd a Seilwaith](#) | [Climate Change, Environment and Infrastructure Committee](#)

[Gwefru cerbydau trydan](#) | [Electric vehicle charging](#)

Ymateb gan Cymdeithas Cerbydau Trydan Cymru | Evidence from Electric Vehicle Association (EVA) Cymru

1. What are your views on the Action Plan?

Electric Vehicle Association (EVA) Cymru is Wales' national representative body for Electric Vehicle owners and drivers. EVA Cymru has three overarching objectives:

To represent the interest of EV owners and drivers in Wales

To promote the uptake of EVs in Wales

To work with other stakeholders to achieve these aims

Along with our partner associations EVA England, EVA Scotland, and EVA Northern Ireland we work with governments and private sector partners to ensure the voice of all Electric Vehicle owners and drivers is shared as widely as possible.

The Welsh Government's 2021 Electric Vehicle Charging Strategy set out a positive statement of intent which supports the uptake of Electric Vehicles across Wales, and recognises the vital role that Electric Cars and Vans will play in the decarbonisation of transport. EVA Cymru welcomed the strategy and the recognition of the different approaches to Electric Vehicle Charging required to achieve a transition away from fossil fuels.

The Action Plan sets out a number of priorities which reflect the breadth of that strategy and we feel having an Action Plan is a vital element of ensuring delivery. However it is important to recognise that many elements of the Strategy itself, and the actions in the Action Plan, are closely linked to - or dependent upon - UK-level decisions (for example, the Welsh Quality Standards).

Whilst recognising the need to also ensure interoperability, we feel the Action Plan could focus attention - and resource - on the areas where the Welsh Government can make the most impact. Specifically Charging Infrastructure, Enhanced Rapid Charging Provision, Partnership and Collaboration, Increasing Public Awareness, Encouraging Investment Opportunity and Innovation, and Creating Synergies.

We feel that the KPIs within the Action Plan should be revisited to ensure they reflect the rate of growth of Electric Vehicles and the urgency of transport decarbonisation required to meet Wales' Net Zero aspirations. The number of Electric Vehicles registered in Wales is increasing by 10-15% each quarter and this exponential growth is placing increased demands on the existing infrastructure.

With even faster growth elsewhere in the UK, the demands of visitors are also increasing and each tourist season sees unprecedented peaks in demand as people move away from fossil fuel vehicles. In short, the overall levels of provision aspired to are now clearly inadequate for both quantity and patterns of usage and we would welcome the opportunity to support Welsh Government in revisiting these targets to better reflect the reality of the rate of EV uptake in Wales.

We also feel that the Action Plan would benefit from developing more detailed KPIs (or intermediate targets) for many of the outcomes where they do not currently exist. The current action plan does not include specific KPI data or even a baseline against which the Action Plan will be monitored.

Finally, we would suggest that the Action Plan offers the opportunity for a broader framework for communicating on progress outside of Welsh Government and would encourage increased communication and collaboration around the delivery of the objectives of the strategy.

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

This action point reflects a key area for delivery against the strategy, most particularly to ensure that the transition from fossil fuel vehicles to Electric Vehicles is supported across all individuals, regardless of their individual situation.

The vast majority of journeys made in any vehicle are currently short enough that an EV would not need to be charged and so, for those who have private off-street parking, the barriers presented by the current public charging infrastructure are far less impactful. The same cannot be said for those without off-street parking and therefore the use of the ULEVTF, alongside other schemes such as the UK Government's On-Street Residential Chargepoint Scheme (ORCS), is a vital component in achieving the strategy's objective that "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."

We are aware of a range of positive projects funded under the ULEVTF such as the delivery of small numbers of chargers across car parks in Swansea (both the city centre and in 'community hubs'). However Local Authority investment is still sporadic and uneven with a broad lack of community engagement. The focus has tended towards Local Authority owned car parks, where charging is best suited to visitors, rather than towards facilities which will support residents to access charging facilities in locations where they would normally park for extended periods (i.e. over nights).

We welcome Welsh and Local Governments' focus on town centre regeneration, however feel that a lack of understanding of 'real world' charge patterns may be encouraging a false perception that greater slow ('destination') charging in City Centres will increase visits and dwell time. Rather, we anticipate that as charging becomes increasingly less frequent, this infrastructure may be left unused and un-maintained, undermining confidence in transitioning to Electric Vehicles.

We would also suggest that the lack of information sharing, both by Welsh Government when distributing funding or Local Authorities when receiving the funding, is undermining Action 7: Increase Public Awareness. A clear forward plan of where infrastructure will be deployed (ideally based on local community engagement to assess and encourage demand) would dramatically increase confidence for prospective and existing drivers and we would encourage Welsh Government to look to adding an objective to publish the locations and timescales for new public infrastructure funded through ULEVTF (alongside planned deployments from any other investment programmes if possible).

We would encourage Welsh Government to see the varying types of charging locations as part of a single ecosystem and encourage the development of Charging Strategies (as seen in Ceredigion) where public sector-driven charging, destination charging (including private sector destinations such as hotels, private car parks and visitor attractions), and on-street charging are planned together where possible to avoid creating 'cold spots' for EV uptake.

We would suggest that Welsh Government might consider an action in the next iteration of the Action Plan to provide guidance to Local Authorities on encouraging private sector to take a role supporting this objective, including how the planning system can encourage and enforce the delivery of charging alongside other appropriate developments (such as hotels, visitor attractions and fueling stations).

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

Broader energy infrastructure is a key enabler, and barrier, for the growth of EV charging infrastructure and there have been a wide range of examples across Wales of Charge Point Operators being unable to invest due to a lack of grid capacity or where installations have remained un-commissioned for extended periods of time due to delays in DNO infrastructure upgrades. In contrast, where grid capability exists and demand is clear, the market has been able to invest in significant levels of charging infrastructure leading to a very uneven distribution of charging capacity across Wales with a 'charging desert' through the middle of the country.

Whilst this action point is closely linked to UK Government and UK-level regulator activity, there are opportunities for Wales to move forward within the broader context of network investment. Critically, it is clear that the increase demand for Electric Vehicle charging has outpaced the speed at which energy infrastructure can be expanded.

Whilst the longer term systemic issues need to be addressed we would encourage Welsh Government to explore opportunities to continue to progress this action through more localised interventions - working with community energy groups, independent filling stations, and similar groups - such as supporting the deployment of battery-augmented charging in key rural locations on major routes, and incentivising charging hubs alongside renewable energy generation projects.

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

Rapid charging on key routes across Wales continues to represent the biggest barrier to the uptake of Electric Vehicles. Since the strategy's launch, we have seen just 53 new Rapid Chargers in key locations across Wales. Whilst this rate of growth is the highest in the UK (33% in comparison to 22% in England, for example) it is from a very low base and is reflective of historic under-investment. Rapid Charging infrastructure remains far lower in Wales than the rest of the UK (1 per 15,000 people in Wales versus 1 per 11,000 people at the UK level).

These new rapid chargers have continued to be clustered together (although not generally co-located) and no new rapid chargers at all have been deployed during the period in 7 local authority areas. This is the result of Charge Point Operators naturally investing at high-potential locations where the cost of deployment (e.g. Grid Connectivity) is also low.

The result is that Wales has only 6 locations which would meet a minimum definition of 'Trunk Road Standard' charging hubs (at least 5 rapid chargers at a single location). Excluding Tesla sites (some of which are not open to all) reduces this number to 3 of which only one - on the A5 at Corwen - is north of the M4. In contrast to most of the rest of the UK road network, Welsh EV drivers are condemned to hope and queue at a wide range of single-charger sites, often in inconvenient locations.

We welcome Transport for Wales' plans to add new rapid charging infrastructure in under-served locations however we are concerned that the programme is moving too slowly and is too unambitious. We would encourage the Action Plan to move away from single rapid chargers in favour of reliable and managed hubs delivered in collaboration with the Charge Point Operators. The Instavolt hub at Rhug near Corwen being an example of this approach in practice.

Of the 21 locations published by Transport for Wales as expecting new infrastructure under this action only 3 are in place. Many of the remaining locations, such as Dolgellau, represent significant 'cold spots' in the network acting as barriers for local uptake as well as to decarbonised travel to and through the area. This reflects the challenging grid environment in those areas however we would encourage efforts to speed up this rollout and to extend the number of chargers at each location to ensure resilience in rural and under-served areas.

Finally we note that there has been no action on any improvements on the A55, North Wales's most significant transport route. Unlike major roads in England and the M4 in South Wales, the A55 has been left out of a major Private Sector upgrade programme run by Gridserve Ltd which has transitioned over 130 key charging sites from older generation equipment to new charging devices and is currently moving those sites to become high-powered multiple charger 'hubs' (with 14 completed or underway). The three key locations in North Wales (A55 Service Areas) are not planned to be upgraded and both Gridserve and the site operators, Euro Garages Group, have not published information about any future plans.

The current issues on the A55 are an example of where Welsh Government could seek to intervene to ensure private sector investments made elsewhere in the UK are also made in Wales. Delivering against this action without significant public investment.

Overall we feel this action should be substantially revisited in the light of the pace of delivery of the original plan and the exponential growth in drivers transitioning to EVs. We would suggest that Welsh Government could consider whether it might achieve more by performing a convening role between Charge Point Operators and the EV driving community to ensure that substantial rapid charging hubs are delivered at key strategic sites on the Trunk Road Network in a way which supports confidence in both North-South and East-West travel in Wales.

We would value specific dialogue with the delivery team on this point

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

EVA Cymru are broadly supportive of the objective to develop a Welsh Quality Standard however we note that this was due to be published in 2021. As far as we are aware, no standard has been published and no consultation has taken place on Welsh standards.

Given the alignment required with UK-level National Quality Standards, we recognise the dependency on progress at a UK-level however we would encourage Welsh Government to progress

this action through consultation and engagement which focuses on Wales-specific requirements (including bilingual signage, customer experience, and support) which do not undermine the interoperability of systems and data or disincentivise investment in Wales.

We recognise that much of the infrastructure investment in Wales continues to be in the retrofitting of charging to existing infrastructure. This, in general, is positive in that it supports the location of charging facilities and raises awareness amongst fossil fuel vehicle drivers. However we would encourage Welsh Government to ensure that the Welsh Quality Standards account for queuing and waiting within infrastructure deployments to avoid a poor user experience at busy times.

We would also encourage Welsh Government to engage with EV Chargesafe who have developed a 60+ point inspection framework for rating charging infrastructure for safety, accessibility, and usability. This independent scheme has received strong engagement from Chargepoint Operators and may provide useful context for the Welsh Quality Standard.

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

We are not aware of any progress against this Action Point which is a vital part of achieving the objectives of the strategy and facilitating Electric Vehicle uptake. Experience to date shows that one of the major advantages of Electric Vehicles to consumers is the ability to charge that vehicle at home.

Building Regulations in Wales currently lag behind both Scotland and England in terms of requiring EV charging in both domestic and commercial properties. In Scotland, for example, a standard (7kW) charge point must be provided for each residential building with at least one parking space and a ratio of 1:10 for every non-residential building. England has in place similar requirements and these regulations also extend to substantial renovations.

Wales has not yet added EV Charging requirements to planning guidance or building regulations however and we would encourage any review to conclude quickly as to not leave Wales further behind the rest of the UK.

There are also opportunities to go further in regulating for the provision of charge points at other key locations including public car parks, hotels, fueling stations, and any residence converted to a holiday let or similar.

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

The establishment of a Charge Point Operator working group is a key mechanism for achieving the objectives of the strategy, and for delivering a viable and fit-for-purpose Electric Vehicle Charging infrastructure across Wales. Charge Point Operators have been open in confirming that capital to invest in charging infrastructure is widely available for operators to access however we have continued to see proportionately less investment in Wales.

Whilst we are not aware of whether the Welsh Government has met the KPI of establishing the Charge Point Operator working group, we would suggest that it remains imperative that Welsh Government, through this group, provide strong leadership and guidance to both commercial and

non-commercial operators (and the two Distribution Network Operators) to ensure the development of a strong and resilient charging infrastructure across Wales.

One opportunity which should be considered for the Action Plan is to encourage partners to collectively 'sign up' to supporting the Strategy and for Welsh Government to facilitate the publication of their own action plans in delivering the objectives of the Strategy.

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

To date, we have not seen any significant progress against this action point which we view as a critical part of the strategy. Whilst the charging infrastructure in Wales has developed substantially since October 2021 (with the number of rapid charging locations, for example, growing by 33%) there has been little raising of awareness of the infrastructure by Welsh Government during that time.

Transport for Wales has been allocated a key role within the delivery of the strategy and we are concerned that, to date, it has been unable to deliver against this priority either due to resourcing or strategic direction. As an illustration of this, since the launch of the strategy in October 2021 there have been 108 news stories published by Transport for Wales of which only one relates to Electric Vehicles and none relate to public Electric Vehicle Charging infrastructure or this strategy.

Similarly, there is no mention of this strategy or work undertaken by Transport for Wales to deliver the strategy in the Transport for Wales 2021/22 annual report.

The strategy states that "We will seek to raise public awareness of electric vehicle charging infrastructure across Wales. Communications will seek to provide consistent, transparent and accessible information to consumers and the wider public" however this is not reflected in communications by Transport for Wales, for example the Transport for Wales publication "Talking Transport: A toolkit for facilitators to engage the public on transport-related topics" references trains, buses, and active travel but does not highlight any aspect of Electric Vehicle charging infrastructure.

In addition, we are concerned that recent Welsh Government strategies (such as the National Transport Delivery Plan) have grouped Zero-Emission Battery Electric Vehicles with other, less environmentally friendly transport such as Hybrid-Electric Vehicles and Hydrogen Fuel Cell Vehicles under the banner of "Ultra-Low Emissions Vehicles". This risks undermining the objective of this action point (increased consumer confidence) and reduces clarity for consumers and the wider public on the Zero Emission nature of Electric Vehicles.

Whilst the lack of progress in this area may reflect the speed at which Transport for Wales' directly-managed Rapid Charging infrastructure has been deployed, we suggest that the resourcing allocated to the broader implementation of the strategy - and to this particular Action Point - may need to be revisited to ensure that the objectives of the strategy in this area are met and that Transport for Wales can perform the executive function identified in the strategy.

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

We recognise that Welsh Government has invested strongly in skills development to support decarbonisation and wider 'green skills' however the support for the supply chain to move to support EVs is less clear. In particular we would highlight three areas where you might expect to see Welsh Government intervention but where there has not been any clear activity:

Firstly support for rural petrol filling stations to transition to become hubs for Electric Vehicle rapid charging (including through the deployment of battery+charger systems and renewable energy generation technologies). These rural businesses are essential parts of many communities however they face a potential threat as fossil fuel use decreases. If, however, they are supported to become bases for (rapid) EV charging infrastructure - in contrast to deployments on public sector sites such as car parks - they can remain a viable and valuable part of transport decarbonisation.

Secondly, the investment in public sector Electric Vehicle charging infrastructure offers opportunities for large bi-directional charging infrastructure deployments which could provide Vehicle-to-Building and Vehicle-to-Grid services such as demand-smoothing and less carbon intensive uses of the grid. This is an area where Welsh Government, working with other Public Sector bodies and the Energy Service could support innovation in line with this Action.

Finally, Welsh Government will no doubt be aware that the automotive sector in Wales is currently heavily focused on the development of fossil fuelled vehicles (including engines and parts) and to date there has been a lack of engagement with this sector by Welsh Government to stimulate the transition of activity in Wales towards Zero-Emission Electric Vehicles. This year, the Welsh Automotive Forum, working with Welsh Government, began a process of mapping the supply chain for Zero Emission Vehicles (including Electric Vehicles) in Wales and we hope that this collaborative piece of work will provide new routes for supporting this sector to transition to support Electric Vehicle production, maintenance and infrastructure.

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

Within the Strategy, Welsh Government has identified benefits from co-ordinated planning and investments which encourage modal shift. We support this approach and the importance of reducing the total number of private vehicle miles in order to reduce the overall environmental and societal impact of travel.

However, actions to date have not always reflected the reality of charging patterns and Electric Vehicle usage. For example, the investment in charging infrastructure at railway stations may not be the most effective choice of location as drivers can (generally) be expected to drive the minimum distance necessary to shift to public transport and therefore be unlikely to need to take advantage of the charging facilities. In contrast, on-street and community car park infrastructure can facilitate the transition to Electric Vehicles across multiple use cases - including those that complete their journeys partly by private and partly by public transport.

It is too early to see if the strategy has been appropriately integrated into Local Development Plans however we would suggest that Welsh Government might consider collating an overview of the alignment between this strategy and draft Local Development Plans to ensure that they support charging infrastructure planning.

What are your views on the strategy ?

EVA Cymru is broadly supportive of the strategy and welcomed the range of interventions identified to deliver a cohesive charging infrastructure. However we are concerned that the level of aspiration outlined in the strategy was low at the time of publication and that the clear and growing shift to Electric Vehicles in private vehicles, company vehicles, and public sector vehicle fleets has outpaced the specific outcomes identified.

We would recommend that Welsh Government review the timelines and targets set to increase the targeted levels of infrastructure and the speed of delivery. The level of aspiration within the current strategy, and the Action Plan, no longer reflects the broader commitment by Welsh Government to the decarbonisation of transport and this lack of ambition risks further increasing the gap in Electric Vehicle uptake between Wales and the rest of the UK.

We also feel that the strategy should be reviewed to ensure it accounts for patterns of usage that have become clearer since 2021 (including the higher average battery capacity of Electric Vehicles and the demand for greater numbers of chargers in fewer (hub) locations).

We would also suggest that the strategy needs to be revisited in light of the growth in Electric Commercial Vehicles, particularly vans (which are now growing at an average of 15% every quarter in Wales), and the need to work with significant fleet owners to ensure that public charging infrastructure supports their needs without reducing the availability for other users.

Finally, whilst the Strategy does identify the role of Welsh Government in working in partnership with the private sector, we would suggest that the strong level of capital investment currently available to Charge Point Operators makes this role even more vital in avoiding disparities across Wales with over-provision (or earlier provision) in some areas and significant under-provision in others.

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

We wish to reinforce our support for the broad nature of the strategy and the actions highlighted in the Action Plan. A reliable, available, and pan-Wales Electric Vehicle Charging infrastructure is an essential part of achieving transport decarbonisation and continuing to develop that infrastructure is essential to ensuring Wales catches up with the wider UK in this area.

We would, however, encourage Welsh Government to consider a more open approach to highlighting the progress made, and planned, against the strategy and the Action Plan and to take a broader approach to engagement. We feel this will support both public confidence and a broader understanding of Welsh Government's efforts in this area. As has been seen with Broadband investments, clarity of current and future plans leads to increased confidence and therefore uptake by the public and businesses.

We would also suggest that Welsh Government should place more emphasis on their role as an enabler and strongly encourage investments by the private sector to meet the aims of the strategy, continuing to co-invest and to drive demand to improve the investment case for those businesses.