

Cynulliad Cenedlaethol Cymru / National Assembly for Wales
Pwyllgor yr Economi, Seilwaith a Sgiliau / Economy, Infrastructure and
Skills Committee
Gwefru cerbydau trydan yng Nghymru / Electric vehicle charging in Wales
Datblygiadau Egni Gwledig (DEG)

Wednesday, 20 March 2019

To: Economy, Infrastructure and Skills Committee

RE: Electric Vehicle Charging Infrastructure – Draft Report

DEG welcome the opportunity to provide input to the above draft report.

DEG is an award-winning social enterprise supporting community led action across northwest Wales to increase our area's ability to cope with the rising cost of fossil fuels and improve our natural environment.

We have worked with over 50 communities helping them to become more sustainable environmentally, economically, socially and culturally.

Much of our work is in community energy and over the past year the communities we work with have become increasingly interested in the transition to electric vehicles and ownership of charging infrastructure. Our input is based on this work and our vision and values as stated on our website here: www.deg.cymru.

It is clear to us at DEG that rural communities are being failed by a reliance on 'the market' to deliver equitable services such as broadband, mobile phone coverage, public transport, and electricity grids. We are adamant that the market will also fail rural Wales if the Welsh Government does not intervene in the development of electric vehicle (EV) infrastructure.

We have structured our response to the Commission's draft report following that of the report itself. Replying to each emerging conclusion and discussion point in turn below.

Thank you for the opportunity to comment on your report, Please turn over for our contribution.

Yn Gywir,

Grant Peisley

On behalf of Datblygiadau Egni Gwledig (DEG)

Emerging Conclusion 1

We would argue that this conclusion does not go far enough in its critique of the current situation in Wales. Not only would 'current infrastructure struggle to cope with a significant increase...' but 'current infrastructure is not coping with existing demand'. For EV owners outside of the M4 channel, infrastructure is virtually non-existent. Furthermore, it is the lack of infrastructure for north and rural Wales that is holding back the decarbonisation of transport and limiting options for residents and businesses that wish to invest in EVs and reduce their carbon emissions.

We have reservations about the wording of the last sentence as it is leading towards the commissioning of further reports which will lead to further delays at a time when clear and decisive action is required. We agree with Neil Lewis' concerns that none of the recommendation of previous reports have been implemented. If feasibility studies are required, they should be prioritised and provided on a tight timeline to ensure that Wales does not lose the opportunities that presently available.

Regarding the Welsh Government and Local Authorities roles in co-ordinating roll out of EV charging, it is our position that there is presently a market failure in Wales in this sector which provides an opportunity for local, community, and municipal ownership of EV charging infrastructure that would ensure the full benefits of this infrastructure are retained in Wales whilst the interests of Wales and its residents are at the forefront of infrastructure development, instead of the profit motives of distant organisations.

A Wales-based not for private profit company could be set-up to work with the Welsh Government and local authorities to facilitate a fair and just roll out of EV charging infrastructure throughout Wales. It is unclear to us if TfW fit such a description. However, we understand a new organisation (TrydaNi) is in planning and encourage the Welsh Government to engage with this organisation.

Emerging Conclusion 2

Leadership and action from the Welsh Government has been lacking when it comes to EVs. The lack of action following the report of the LCESG in 2015 is a prime example but also the lack of activity following the £2m investment in rapid charging and the lack of investment in EVs in the Government fleet shows that there is still little commitment.

We have grave concerns that the Government will attempt to give the lead to industry, to limit the Government's need to take responsibility and act now. We would warn against the recommendation for an industry-led governance body is set-up. Such bodies have repeatedly been seen to have primary concern over industry interests and achieving easy wins, almost always leaving rural areas of Wales underserved and in infrastructure poverty, while removing money from our local economies.

Grid infrastructure will be a further limiting factor for rural Wales. The Welsh Government must not let this slow progress and use their powers and leadership as we are in critical need for action to safeguard our environment and make the most of the economic benefits EV infrastructure can provide. Further delays now will have significant impacts on our ability to decarbonise by 2030.

Emerging Conclusion 3

With rising fossil fuel costs, the transition to active and electric transport is will help to limit an increase in fuel poverty, especially in rural wales such as the Llyn Peninsula where fuel costs are the highest and wages lowest. People in this area must travel further for work and have limited public

transport options. Investment from the Welsh Government in such deep rural and impoverished areas could have transformative impacts.

Emerging Conclusion 4

We agree with this conclusion but warn against engagement being used as a means to stall real action.

Emerging Conclusion 5

There is concern with rural areas such as those we work in that EV infrastructure will not reach out of the City regions and urban areas. These areas are more likely to benefit from active travel and improved public transport whilst those in rural areas have greater need for car ownership and cover more miles per annum than most urban and city residents.

Emerging Conclusion 6

We have repeatedly made the point that rural areas must not be forgotten or left to wait while other better off areas of Wales receive support. Poor people can benefit from EV infrastructure via local ownership providing benefit back to these areas, as seen with community energy. Community transport initiatives can take advantage of improved charging opportunities and local authorities can use charging infrastructure in areas of greater need.

DEG has participated in study visits to our European neighbours, particularly Holland and Belgium, where we have seen models of EV car sharing that allow local government to rent their cars to residents at evenings and weekends, when the cars would otherwise be unused. This model brings an income back to the local government and provides opportunities for low income families to use EVs.

We are not convinced that pursuing private investment will facilitate the greatest benefit for Wales. We are convinced that private investment will support the most advantageous sites for infrastructure whilst leaving the harder to service areas barren. A not for private profit approach would allow those sites with a greater return to subsidise harder to serve areas and we again urge the Committee to recommend swift action by the Welsh Government to make such practice possible.

All public bodies throughout Wales should already be replacing their internal combustion vehicles (ICV) with EVs. No more ICVs should be purchased by public bodies without justification, such as if there is no EV available for the work required (e.g. large heavy vehicles). All cars and light vehicles should be replaced over the next three years.

The Welsh Government must use its powers and leadership to ensure local authorities act swiftly and in the best interests of local people. Where LA's are unwilling or unable to act the opportunities should be opened to community organisations to ensure that Wales does not have the same situation of missed opportunities that we have with renewable energy potential on local authority land.

Community energy groups have often not received permission from LAs to develop viable schemes on LA owned land only for those opportunities to go undeveloped by the LAs themselves.

As we have argued above, the market will not provide coverage for all of Wales and will only serve the most beneficial areas that provide the greatest profit. Government and communities can take a more holistic approach that allows for more profitable sites to subsidise less profitable sites. Without immediate and decisive action, the opportunity to provide greater equality of opportunities across Wales will be lost as these best sites are taken up by the market. Again, this has been shown with renewable energy where communities could have developed many more sites and provided far greater local benefits if the market had not first banked all most beneficial sites in Wales. The market

almost always serves to remove economic benefits from Wales, thus reinforcing our economic difficulties.

Emerging Conclusion 7

Range anxiety has been a significantly negative impacting factor on the uptake of EVs, however the newest EVs are providing far greater range than early models thus reducing range anxiety. This does not reduce the need for a network of EV chargers across the entire country, but it does suggest that the term 'range anxiety' should no longer be used as an excuse for not transitioning to EVs.

Emerging Conclusion 8

Scottish Power Energy Networks are delivering a funded project to help understand and pilot innovative models for EV charging that do not impact negatively on local grids. It is recommended that the Committee seeks input from SPEN to compare with submissions quoted from WPD. We are aware that communities in north west Wales are concerned that SPEN are using this project as a means for banking the most effective EV sites for their vertically integrated business partners. The Welsh Government should act to ensure that this is not the case and that findings from the SPEN project are shared with the Government and local communities to facilitate a partnership approach and local/public ownership of the infrastructure.

We must not lose sight of the fact that DNO's are commercial organisations striving to maximise profits via increased income and decreased costs. The pressures they have to maximise profits do not make them best placed to act in the interests of the people of Wales. It is the Welsh Governments job to intervene and ensure that both the National Grid and DNOs are developing the grid appropriately.

Co-locating renewable energy and EV charging is the preferred the option and attention should be given to the ownership of the renewable energy being used. Community energy groups are well placed to contribute to this aim and should be included in the first instance.

A greater use of EVs by public bodies will increase awareness of their advantages. The only role for the Government here is to create policy that forces Public Bodies to act now.

Locating charging points is already available by several online websites and apps. There is no need for the Government to duplicate these services.

Emerging Conclusion 9

Having partaken in study visits to Holland and Belgium in the last 6 months it is clear that the built environment in Wales is not fit for the future and that our existing policies do not go far enough for us to keep up with our European neighbours. Our housing must be far more energy efficient, brighter and better planned to include electricity connections that allow for prosumers to generate, store, export, and charge. Again, the Welsh Government needs to be far more ambitious in its policies.

Emerging Conclusion 10

We agree with this conclusion and suggest supermarkets should also be included.

Emerging Conclusion 11

As with all technology, development is happening fast but we must not let fear of new technologies emerging in the future stop us from acting today.



Rapid charging infrastructure will allow those without off-street parking to charge to 80% in approximately 20 minutes. Therefore, there is a need for strategically placed rapid charging hubs to provide this service.

The Welsh Government must recognise that expertise exists within our communities, not just in their offices or those of universities. As your consultation has shown, there are experts available and willing to contribute.

Emerging Conclusion 12

As our previous points have made clear, we hold concerns over the equity of EV infrastructure development. These concerns are increased if a market-led, or an industry-led approach are implemented. We are pleased to see the National Grid sharing our concerns.

We firmly believe that the only way equitable services can be provided in rural areas is via Welsh Government intervention. The Welsh Government should not waste more time pursuing a market-led approach to rural EV infrastructure. They should instead pursue a community or public owned approach, as we've advocated above, that provides greater equity between rural and urban areas.