

Economy, Infrastructure and Skills Committee

National Assembly for Wales

Cardiff Bay

CF99 1NA

To whom it may concern,

Energy Saving Trust is pleased to respond to the request for comments on the draft report on Electric Vehicle Charging Infrastructure from the Economy, Infrastructure and Skills Committee of the National Assembly of Wales.

Unfortunately, due to recent staff changes, we were not able to respond to your original inquiry. We are therefore submitting a response to your draft report, with views on the emerging conclusions. Given that we have not engaged with the Committee before, we also provide some context explaining EST's work in Wales and in the area of sustainable transport, which we hope you will find useful.

### **Energy Saving Trust**

The Energy Saving Trust (EST) is the leading sustainable energy organisation, working to change the way people use energy in homes, communities and transport. We work across the UK, delivering programmes for Welsh, Scottish, Northern Irish and UK governments, as well as for private and public organisations. Our UK-wide programme is supplemented by an extensive programme of research and policy collaborations at European level.

EST is delivering a number of programmes on home energy (notably the Arbed programme) and local/community energy (the Welsh Government Energy Service), on behalf of Welsh Government.

On transport we deliver very extensive programmes for the UK Government Department for Transport (DfT), the Office of Low Emissions Vehicles (OLEV), and the Joint Air Quality Unit (JAQU); EST plays an important part in delivering the Road to Zero Strategy. We also run a major programme for Transport Scotland, an agency of the Scottish Government.

Whilst we do not deliver a dedicated transport programme for the Welsh Government, we do periodically deliver contracted transport work in Wales or are involved in activity that arises from our DfT funded transport work, for example: on behalf of OLEV, EST administers the On-street Residential Chargepoint Scheme (ORCS) which provides funds to local authorities across the UK to install chargepoints for residents without access to off-street parking. Through this programme in 2018/19, Cardiff City Council was awarded £134,000 from OLEV and similar-sized proposals for 2019/20 have been received from two further Welsh local authorities which may be supported by additional funding from the Welsh Government.

EST is involved a much wider range of transport programmes in England and Scotland than we are in Wales, which reflects the – to-date – generally lower level of activity in Wales in regard to the promotion of ultra-low emission vehicles (ULEVs). The programmes we deliver in Scotland and England include:

- **Electric vehicle charging infrastructure planning in Scotland<sup>1</sup>**- Through Switched on Towns and Cities in Scotland and similar projects, on behalf of Transport Scotland, we assist local authorities to identify the quantity, specification and locations for electric vehicle charging infrastructure, taking into account forecast levels of demand, installation costs and user convenience.
- **Local Government Support in England<sup>2</sup>** – in response to the need for greater coordination between authorities and central government and highly varied levels of local authority officer expertise, EST is funded by DfT to provide a dedicated team offering independent, tailored support to local authorities in England to secure air quality improvements, including facilitating charging infrastructure delivery.
- **Business Fleet advice<sup>3</sup>** – Based on detailed data analysis of fleet vehicles and performance, on behalf of DfT, in England, EST provides business and public sectors fleets with detailed recommendations to reduce emissions and costs, including on the adoption of ULEVs.

## Comments on the draft report on Electric Vehicle Charging Infrastructure

### ***What role should Transport for Wales play in the development of EV charging infrastructure across Wales?***

*Last year we supplied a map of chargepoint infrastructure to the UK Government BEIS Select Committee – this is based on 2016 official data. The map indicates a lower density of chargepoint infrastructure in Wales than in rest of GB and is reproduced at Annex 1 attached with our letter, below.*

To encourage investment, it would be helpful for the Welsh Government to demonstrate its commitment to the electrification of transport through an EV or charging infrastructure strategy that aligns with the UK Government's Road to Zero ambition to end the sale of conventional petrol and diesel cars by 2040, it could also explore adopting an earlier target, for example the Scottish Government has adopted a 2032.

The Welsh Government should also explore the potential for offering financial support to catalyse investment by the private sector and Welsh local authorities in charging infrastructure and ULEVs would also be directly beneficial, especially in the short-term. Transport for Wales may wish to consider:

- Targeted capital funding for strategic or workplace charging infrastructure, in addition to the £2m already committed for measures such as the electrification of licenced taxis and private hire vehicles.
- Continue match-funding applications made by local authorities for OLEV grants, such as ORCS. The requirement for local authorities to 25% of the upfront costs can potentially be a barrier.

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<sup>1</sup> <https://www.energysavingtrust.org.uk/scotland/businesses-organisations/transport/switched-towns-and-cities>

<sup>2</sup> <https://www.energysavingtrust.org.uk/transport/local-authorities/local-government-support-programme>

<sup>3</sup> <https://www.energysavingtrust.org.uk/transport/fleet-support>

***What is the role of the Welsh Government in co-ordinating roll out of EV charging across Wales? Should the Welsh Government and local authorities be engaging with private charging companies about their plans for developing EV infrastructure? And if so, how?***

As set out the Road to Zero strategy, OLEV see an important role for private sector investment to enable the delivery and operation of a “self-sustaining public network”. Government support would then target specific areas of market failure, such as accessible and remote rural areas. At present, coordination mainly occurs locally through informal, direct conversations between officers and charge point providers, if ‘Requests for information’ are issued ahead of tenders, or if a regional EV strategy is put to consultation.

Increasing numbers of local authorities are delivering infrastructure jointly with the private sector through bespoke procurement frameworks or concession contracts. As these innovative contracts take time to create and there is the risk of duplicated effort between local authorities. One way of smoothing this process and avoiding duplication is the production of procurement guidelines.

However, the quite different approach taken in Scotland should also be noted: the Scottish Government has placed greater emphasis on public-sector funding and ownership. EST would be happy to provide further details about how ChargePlace Scotland<sup>4</sup> operates and in particular, how publicly funded chargepoints are integrated into a single network covering the whole of Scotland.

### **Chapter 3 – Leadership**

***What would be a realistic target for Welsh Government to convert its fleet to electric? Should there be a target for other public sector bodies?***

EST is currently assisting central government fleets in England to achieve the Government Fleet Commitment target for 25% of fleets to be electric by 2022, for example by identifying suitable vehicles which could be switched to electric and assisting fleet managers to plan replacement cycles.

Before setting a target, it is recommended that a thorough assessment of the Welsh Government’s fleet is carried out, as the ease and cost-effectiveness of conversion to electric will depend on current vehicle types, average mileages, operational requirements, ULEV model availability, charging requirements etc. EST would be happy to assist the Welsh Government as this is a core areas of our expertise.

***Should the Welsh Government be supporting the development of electric vehicle car clubs, or should this be left to the market and local communities?***

Government funding could be used as a catalyst to support car club fleet electrification, but the Welsh Government should also look at supporting electrification by working with local authorities to specify electric vehicles when tendering for car club services. In Scotland, Energy Saving Trust administers the [Plugged-In Households Grant Fund<sup>5</sup>](https://www.energysavingtrust.org.uk/scotland/grants-loans/plugged-households), on behalf of Transport Scotland, providing an opportunity for not-for-profit housing associations and co-operatives in Scotland to apply for funding to procure the services of a zero emission car club vehicle, for use by their tenants and the wider local community.

### **Chapter 5 - Planning for new infrastructure**

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<sup>4</sup> <https://chargeplacescotland.org/>

<sup>5</sup> <https://www.energysavingtrust.org.uk/scotland/grants-loans/plugged-households>

***... Does planning policy need to be revised to provide guidance for charging on residential developments too? If not, why not?***

The Welsh Government may want to consider a similar requirement in national planning policies to the Road to Zero proposal for every new home in England to have a chargepoint. As a minimum standard, the Welsh Government should be aware that EU Energy Performance in Buildings Directive requires member states to ensure that ducting is installed for new residential buildings with more than 10 spaces, to enable easier installation of chargepoints at a later date.

***What are the potential charging solutions for those people without off street parking?***

On behalf of OLEV, EST administers the On-street Residential Chargepoint Scheme and assists local authorities through each stage of the application process. In 2018/19, £1.6m was allocated to local authorities across the UK and, as described above, some Welsh local authorities have taken advantage of this scheme.

In terms of charging solutions, lamppost sockets are proving increasingly popular (appropriate where the column is on the edge of the pavement closed to the carriageway) and there is a growing range of free-standing column designs to minimise the size and visual impact of additional street furniture. Trials in cities such as Oxford are also testing new ideas, including pavement channels or retractable columns. Alternatives include locating chargepoints in 24/7 car parks in residential areas or rapid hubs (but this is likely to be more expensive per charge for residents).

***Is the expertise to develop effective, fit for purpose charging infrastructure available in Wales – for example, in local authorities, the Welsh Government, Transport for Wales?***

In EST's experience, not every local authority has the capacity to dedicate officer time to keep pace with vehicle and charging technologies and policy developments and respond accordingly.

To respond to this need, for England, on behalf of DfT EST developed the Local Government Support Programme to offer tailored, one-to-one, impartial support to local authorities on sustainable transport. It launched in Oct 2018 and is funded by the Joint Air Quality Unit, part of the Department for Transport. Demand for assistance has been strong and varied.

In Scotland, the Switched-On Towns and Cities programme produces in-depth, fully-costed charging infrastructure feasibility studies for around ten authorities per year, with the aim of enabling a step-change in charging provision and EV uptake. Few local authorities would be able to undertake this analysis in-house.

**Chapter 6. Urban/rural divide**

***How can "the market" be encouraged to invest in rural areas?***

***Where should the Welsh Government be focusing funding? Should development of EV charging in more rural areas of Wales be left to the market, or should the Welsh Government intervene?***

In the short-term, as Wales is lagging behind other parts of the UK in charging infrastructure development (see figure 1 in Annex), investment in both urban and rural areas is likely to be beneficial and worthwhile. Evidence from other parts of the UK suggest that it is likely to be difficult to encourage the market to invest in accessible and remote rural areas. The best business propositions in these locations are often for rapid chargepoint hubs located close to amenities with high footfalls to maximise potential utilisation rates and turnover.

Chargepoints on key trunk roads are a stronger business proposition than isolated rural chargepoints and improve EV driver confidence. However, as there can be issues with limited electric grid capacities in these locations, government support to cover DNO supply upgrade costs for these sites

could encourage investment. Transport for London (TfL) took a similar approach in London. EST would be happy to share our experience working with Scottish Government to create the world's first 'electric highway' on the A9.<sup>6</sup>

## **Conclusion**

We hope that the information provided will be useful for your discussion with the Minister for Economy and Transport later this term. We would welcome further dialogue and discussion with the Welsh Assembly and government on how we can support the rollout of charging infrastructure and increased ULEV uptake, drawing on our expertise assisting DfT, OLEV, JAQU and Transport Scotland, and a range of low-carbon transport initiatives.

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<sup>6</sup> <https://www.transport.gov.scot/news/electric-future-for-a9-and-beyond/>

**Annex 1**

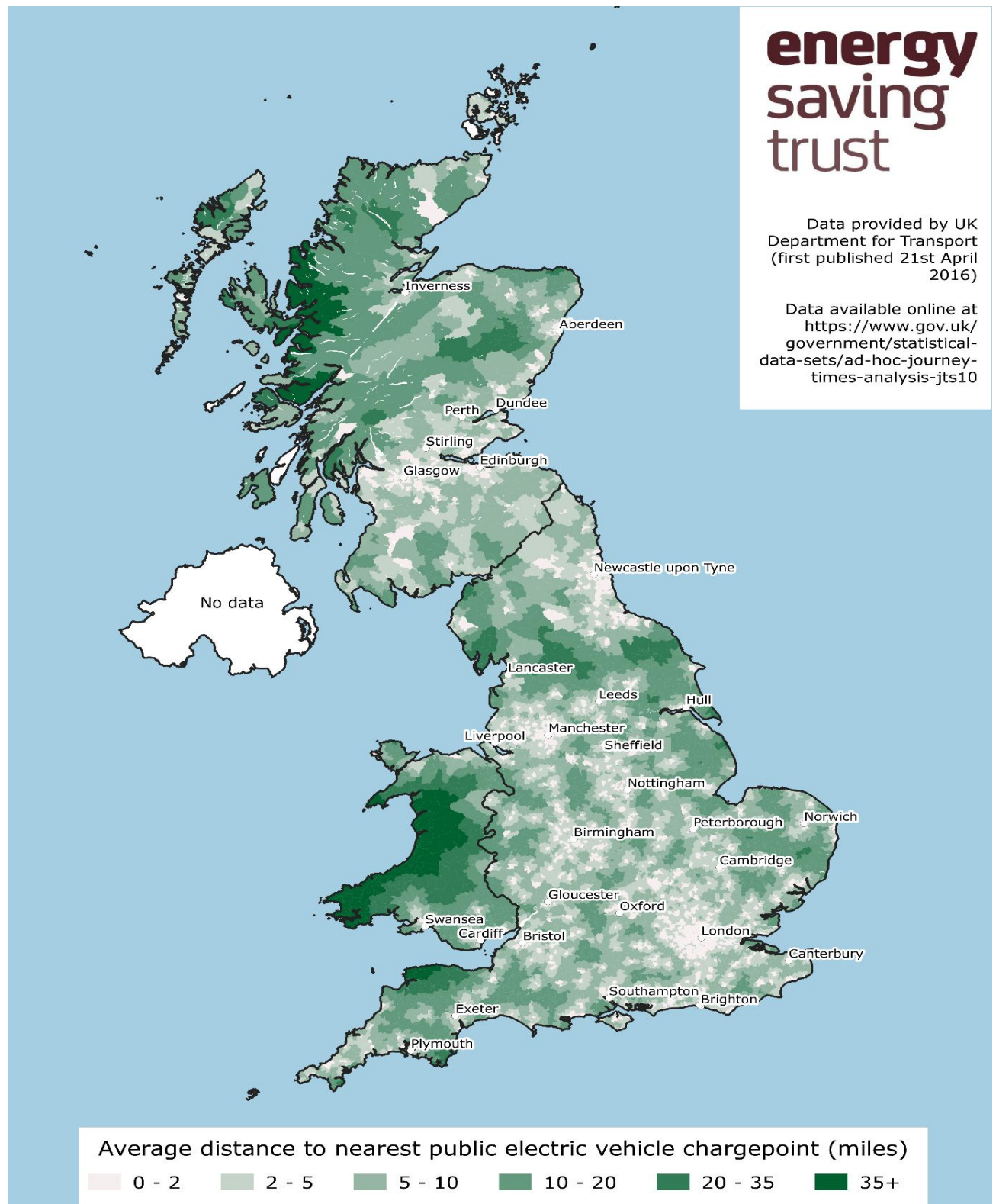


Figure 1 Geographical disparity of availability of EV chargepoints in Wales Extracted from page 26 of Electric vehicles: driving the transition, House of Commons Business, Energy and Industrial Strategy Committee, 2018