

**Welsh Government consultation on an electric vehicle (EV) charging strategy for Wales
24th February 2021**

About CPT Cymru

Cyddfederasiwn Cludwyr Teithwyr Cymru/The Confederation of Passenger Transport Wales (CPTCymru) is the professional trade association of the bus and coach industry in Wales and is part of CPT UK. Its members in Wales include operators forming part of large multinational transport operators, municipally owned operators, medium sized independent operators and small family businesses. CPT Cymru members provide over 80% of all bus journeys and some 70% of all public transport journeys made across Wales. Our members are often significant local employers, especially in the rural parts of Wales, and make major contributions to their local economies. The bus and coach industry as a whole employs some 4000 people across Wales.

Introduction

CPT Cymru welcomes the opportunity to contribute to the Welsh Government's consultation on an electric vehicle charging strategy for Wales. The decarbonisation of Wales' passenger transport sector is a key contributor towards meeting the Welsh and UK Government's targets to achieve a net reduction on greenhouse gas emissions of 100% by 2050. As a sector, we understand the importance of this transition and are keen to play our part so that Wales' bus and coach fleet are able to contribute positively to this process.

We are disappointed that Welsh Government did not engage with sector prior to publication of this consultation document (or the parallel document on hydrogen). We have endeavoured to answer the questions set out in the consultation document; however these are largely focused on private car use.

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

Whilst we welcome Welsh Government's thinking in relation to electric vehicle charging, we are concerned that this strategy has too narrow a focus and serves to entrench behaviours that mitigate against modal shift. The Welsh Government's draft transport strategy – Llwybr Newydd – sets out the transport hierarchy as a means for achieving modal shift.¹ CPT Cymru is disappointed that this thinking has not been incorporated in the EV Charging Strategy.

Indeed, the bulk of the strategy rests on the premise that electric car and van usage is will be a like-for-like replacement to current car usage with further growth and that this alone will resolve the associated environmental challenges. CPT Cymru would contest that while a shift to private EV usage would address some environmental and air quality challenges, it would mitigate against the modal shift Wales needs in order to achieve a more efficient, prosperous and environmentally friendly society.

As such, we would urge the Welsh Government to consider a much broader range of issues including how such a strategy could be used to reduce the need for private transport and address issues such as congestion. Ultimately, a policy framework to grow usage of public transport, coach travel and active travel will generate revenue which, with grant assistance, will accelerate investment opportunities to "green" the fleets making Welsh Government's targets for decarbonisation easier to achieve.

We note that in chapter 7 the vision is as follows: "By 2025, all users of electric cars and vans in Wales are confident that they can access electric vehicle charging". We would suggest this is reviewed to include a prioritisation of modal shift.

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 chargers are deployed, in the right locations, across Wales to meet the demand described in this strategy?

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?

¹ <https://gov.wales/sites/default/files/consultations/2020-12/consultation-document-llwybr-newydd.pdf>

Welsh Government's existing policy – zero tail pipe emissions 2028

Before commenting on the appropriateness of the strategy for the passenger transport sector, it is important to examine Welsh Government's existing policy drivers. The Welsh Government currently has a stated policy of reducing tail pipe emissions from buses to zero by 2028. There is no similar target for the coach sector.

Whilst the ambition to deliver a zero tail pipe emission sector by 2028 is admirable, it is not at present feasible given the support landscape that exists within Wales. Indeed, the policy as currently constituted is causing confusion and has the potential to impact on investment by operators in the future.

In short, our concerns with the policy are as follows:

- The stated policy is for 2028 to be the date at which buses have zero tail pipe emissions. However, we understand that consideration is being given to instead implementing a ban on new diesel vehicles from 2028 onwards in Wales. Either policy could lead to significantly different investment outcomes from the sector's perspective.
- The usual life of a vehicle is around 16 years. As such, operators are concerned that purchasing an ultra-low emission diesel vehicle that conforms to Euro VI requirements would be impractical with a ban implemented in 2028. There is a risk of this causing an investment gap for all operators in Wales due to a lack of clarity from Welsh Government on its expectations. This may be particularly acute for UK-wide companies that may choose to invest elsewhere where the terms of investment in vehicles is clearer.
- There is concern around the appropriateness of EV technology alone to deliver the long-term transition to zero tail pipe emissions. Current models of electric is appropriate for urban, short-range applications, but may not be best suited long term for rural, long-distance and hilly topography. Further consideration needs to be given to the infrastructure required for other technology such as hydrogen as part of a broader approach to vehicles going forward.
- There is currently no dedicated grant or financial support specifically for operators in Wales to help purchase zero emission vehicles. Welsh operators and local authorities must therefore bid in to funding elsewhere in the UK. Without this support, it is uneconomical for operators of all sizes at present to purchase EVs instead of Euro VI vehicles, particularly as EV technology is still relatively immature with relatively little experience of whole life costs and performance.

In order to deal with this, we would suggest that Welsh Government in the first instance convenes a forum by which the passenger transport sector can engage with Welsh Government to shape future policy. It is vital that any future policy statements in this area are as a result of consultation with the sector and that through partnership both Welsh Government and operators can work together towards change.

CPT Cymru would recommend consideration be given to the following:

- Instigating a capital grants fund to purchase electric vehicles and the supporting infrastructure. It is particularly important to ensure that plans for vehicles and infrastructure are fully aligned - without the means to purchase EVs the infrastructure will not be utilised.
- Increase funding through BSSG and/or use additional funding to encourage low and zero emission vehicles. The UK Government's capital expenditure only funding support currently falls short of what is required to cover the full extra costs of zero emissions rollout. The Scottish Government's capital expenditure and BSOG scheme by contrast is sufficient to incentivise volume introduction. The Welsh Government needs to consider how to plug the costs difference either through capital and BSOG funding or through enhanced capital funding. This could be capped at the whole life difference between an equivalent Euro VI vehicle and an electric vehicle
- Bring together the conversation about infrastructure with an EV purchasing strategy. Welsh Government, working with operators, should draw up an EV purchasing strategy that will help clearly align future demand and the infrastructure needs associated with it.
- Ensure the approach to EVs in Wales is able to adapt to technology as it changes. This is particularly important in terms of ensuring the right zero emissions strategy overall as products develop and the technology improves.

EV infrastructure and the coach sector

CPT is currently in the process of a developing a coach strategy with operators that will set out key issues as we look to recover from covid-19 and deal with long-term challenges such as decarbonisation. The technology for long-distance electric coach travel is developing however operators have concerns around the cost and availability of

infrastructure associated with the transition to EVs. It is estimated that a charging point would cost between £20,000 and £35,000, plus associated costs depending on the site.

To overcome these barriers, consideration will need to be given towards on-route or at location charging facilities, and this could require investment by government. By doing so, the government will help to lower the barriers to uptake as the technology develops further.

Welsh Government should consider the following:

- Encouraging and funding local authorities to increase the public charging infrastructure wherever possible, such as at town centre parking for coaches.
- Review the planning requirements for new developments to ensure electric vehicle charging infrastructure is in place that supports coach operators.
- Ensure funding schemes such as those proposed in this response enable operators to upgrade their depots for EV infrastructure.
- Treat the provision of home-to-school transport separately. The mileage here is very modest and as such there are further challenges around affordability.

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.

Q4a: Do you have access to off street parking?

Whilst this question is not directly relevant to operators in Wales, it is important to note that any moves to create on street charging locations will have an impact on road space. As set out above, the priority should be to encourage modal shift in the first instance. As such, any on road charging facilities should not interfere with bus priority measures such as bus lanes. Moreover, on street charging also has the potential to limit the future introduction of bus lanes and should therefore be considered very carefully with modal shift the key priority.

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).

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?

We note that the consultation is primarily focused on car and van users. Greater clarity will be required on the specific infrastructure needs in relation to the bus network and for coach travel. For instance, bus depots, bus stations and interchanges may all need to be utilised for charging infrastructure. It is also important to consider 'opportunity charging', that is opportunities to charge vehicles on route. This will require a thorough understanding of the space available for infrastructure by planning authorities.

For example, Cardiff's new bus station and Porth's new interchange were designed without EVs in mind requiring layover space to charge. Furthermore, bus depots may not have the space for overnight charging on site or the potential to upgrade their energy supply. This will require further consideration. "Hubs" may have a role to play in specific circumstances but operators will in general wish to charge vehicles at their depots to ensure on demand access/efficient bus turn-around and minimise dead running.

As such, CPT Cymru would suggest that with the support of operators, Welsh Government and local authorities review depot sites for potential EV infrastructure, determine the associated supply issues and any other constraints that may impact on EV charging delivery. This could form part of a national plan to understand the resource requirement to achieve the transition towards EVs in line with Welsh Government policy ambitions. Crucially, this should be done to a clear timescale, perhaps by local authority area and be regularly updated.

Similarly, CPT Cymru would suggest that future planning decisions around transport infrastructure include space for EV charging facilities as a requirement, including surety of electrical supply (reserved as a priority user) and associated requirements. In the longer term, ensuring attractions have charging facilities for coaches will be essential.

Finally, it is important to recognise that infrastructure costs have an important relationship with the volume of vehicles operated. Higher volumes of electric vehicles will increase the viability of infrastructure investment.

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

As is the case with the uptake of electric vehicles, Welsh Government should institute a grant regime to help cover the costs of fitting out EV charging infrastructure. This could be similar to the Ultra-Low Emission Bus Scheme (ULEBS) run by the UK Government Department for Transport which allows coverage of up to 75% of infrastructure costs for EV infrastructure and should look to support leasing arrangements. With the existence of the Development Bank of Wales (DBW), Welsh Government could look at other financial models through DBW that could offer preferential interest rates and terms for such investments.

A key consideration for infrastructure associated with electric vehicles will also be electrical supply. It will therefore be important to work with power distribution companies to forecast electrical supply and to understand how to build resilience in the case of failures of power supply. Moreover, thought will also need to be given to the cost per kWh as demand increases for charging private vehicles such as electric cars. Operators will be incentivised to invest further if Welsh Government can facilitate Wales-wide utility supplier deals to cap costs over the longer-term. Similarly, further consideration needs to be given to grid capacity and resilience

Finally, any rollout of EV infrastructure should prioritise areas that will deliver the greatest benefit from EVs, such as areas under air quality management regimes, or those particularly suitable to the technology available. This needs to be factored in early on to the rollout plan to ensure maximum impact.

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?

We neither agree nor disagree with the outcomes proposed, however we note that the strategy does not at present place enough emphasis on modal shift as a means to address issues related to the transition towards the decarbonisation of transport.

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

N/A

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

Welsh Government should work closely with suppliers and operators in order to ensure good value to both in 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 chargers to between 30,000 to 50,000, and increasing numbers of rapid chargers to up to 3,500, over the next ten years), do you agree with these figures?

CPT Cymru does not agree with the figures described in the strategy. In our view, Welsh Government should be looking to positively encourage modal shift and to reduce the usage of private vehicles in line with its ambition as set out in the draft transport strategy Llwybr Newydd.

Q9: Any further comments?

Whilst we welcome the creation of an EV charging strategy for Wales, it is important that broader technologies that will be relevant to the passenger transport sector are also included in an examination of infrastructure requirements. Relevant here is the Welsh Government's consultation on an approach to hydrogen technologies in Wales that has a commitment to developing a fleet of 200 hydrogen buses in a town, city or region in Wales.² This is particularly important as some bus routes or coach destinations may be better suited to hydrogen rather than electric vehicles.

² <https://gov.wales/sites/default/files/consultations/2021-01/hydrogen-in-wales-consultation.pdf>

The key early requirement for establishing a hydrogen roadmap looking ahead is to establish a rigorous and evidenced understanding of the Total Cost of Ownership in a Welsh context. We are disappointed both EV and Hydrogen strategies have not been considered together, however we will be making further comments on the hydrogen roadmap in the parallel Welsh Government consultation on hydrogen.

Conclusion

CPT Cymru welcomes the opportunity to input into the Welsh Government consultation on its strategy for EV charging infrastructure. In this response CPT Cymru has raised a number of issues relating to this and the broader transition towards a lower emission transport system.

We would welcome the opportunity to discuss this further, please do not hesitate to get in touch on the contact details below.

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