



RTPI Cymru

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e-mail response sent to: EVCharging@gov.wales

Dear Sir/Madam,

Response to: Electric Charging Vehicle Strategy

The Royal Town Planning Institute (RTPI) is the largest professional institute for planners in Europe, representing some 25,000 spatial planners. RTPI Cymru represents the RTPI in Wales, with 1,300 members. The Institute seeks to advance the science and art of planning, working for the long-term common good and well-being of current and future generations. The RTPI develops and shapes policy affecting the built environment, works to raise professional standards and supports members through continuous education, training and development.

Thank you for the opportunity to the respond to the above consultation.

We support the Strategy which in principle appears a sensible approach, highlighting the scale of the challenge as well as the barriers to deployment, however we have the following comments and observations to make in relation to the consultation questions.

We support the statement at pg 36 of the Strategy which states, “where possible, electric vehicle charging is installed at locations that complement other modes of sustainable transport, including the use of public transport, walking, and cycling”. It is important that planning for electric vehicle (EV) charging continues to sit alongside plans for improving provision for active travel and other sustainable modes of travel.

RTPI Cymru has long called for a “more integrated approach to transport and land use planning” in line with the findings of the RTPI Net Zero Carbon Transport research <https://www.rtpi.org.uk/research/2020/june/net-zero-transport-the-role-of-spatial-planning-and-place-based-solutions/>. It is vital that we work to better integrate transport and development planning policies, plans, strategies and funding as well as effectively integrating our working practices across these and other sectors, if we are to enable a modal shift, achieve decarbonisation, net zero targets and climate action goals.

We urge the Welsh Government to work closely with the UK Government and other devolved nations to support the development of common technical standards and practice.

Our response to the consultation questions are set out below

If you require further assistance, please contact RTPI Cymru on 020 7929 8197 or e-mail Roisin Willmott at walespolicy@rtpi.org.uk

Yours sincerely,



Dr Roisin Willmott OBE FRTPi

Director

RTPI Cymru

A Vision for Charging in Wales: 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.

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

RTPI Cymru supports the vision in principle. We support the aims of the Strategy and the emphasis in relation to partnership and collaboration, which will be the key to achieving the vision.

We welcome the acknowledgement that the Covid-19 pandemic has raised awareness to accelerate the decarbonisation of transport and wider systems to support the transition to net zero. We also support the ambitious timeline to 2025 and need for adequate funding for potential partnerships and collaborators to enable investment in infrastructure. However we question the impact, in practice, that the Covid-19 pandemic will have on the targets and delivery of the Strategy. For example, will investment need to be deferred by some landowners/private providers etc? If so, will the vision still be achievable?

The RTPI Plan the World We Need campaign sets out the role planning can play in a sustainable, resilient and inclusive recovery in Wales and echoes some of the messages around building on positive behavioural change and adopting a focused partnership approach etc. <https://www.rtpi.org.uk/media/5728/wales-plan-the-world-we-need-final.pdf>

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? Please provide your comments:

The Strategy brings forward the potential for cross sectoral planning and for Welsh Government to create the conditions needed for investment.

We note the reference that an accompanying action plan to track and manage delivery will be informed by the consultation responses. A clear and detailed strategy and programme that all partners can sign up to is required. For example, in more remote parts of Wales it is likely that the costs to install chargers, particularly in the short to medium term could outweigh the potential return on private sector investment. We question the impact of this on delivery and would suggest that early discussions be held with all parties, including the private sector around feasibility etc. There may be lessons from the roll out of broadband in

rural areas.

The public sector will have a role to play in planning the infrastructure necessary to support delivery.

There is likely to be a disparity between infrastructure required at peak tourism season and the remainder of the year. It is therefore important that the tourism industry plays its part in meeting targets for decarbonising in Wales. Clear guidance is needed on how seasonal resorts and attractions can achieve sufficient energy provision to cover very substantial peaks and troughs in demand in a cost effective manner. Potential interventions in these more rural areas may also support the wider economy.

Given the pace at which electric vehicle charging infrastructure will need to be rolled out and recognising how quickly technology changes (e.g. scale), we question whether it will be necessary to keep permitted development rights under review, in consultation with developers / manufacturers / designers to ensure they remain relevant going forward.

We support the principle of the substantial increase in charging points, but this should not be at the cost of townscape and inappropriate development for on street charging. The need for electric charging points in the street may have implications for trees with the scale of new cabling works required. Work will be needed to improve integration with street lighting etc. and we question whether all stakeholders, including owners of the street lighting infrastructure, town and community councils, highway authorities etc. are engaged with the issue sufficiently to deliver the challenging timelines?

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? Please provide your comments:

See above responses in relation to barriers.

The Strategy notes grid capacity as a barrier / constraint to delivering net zero and, under the heading 'Unlocking the grid', notes the key stakeholders (the Distribution Network Operators – Western Power Distribution and Scottish Power Energy Networks, National Grid and Ofgem) involved in promoting a “regulatory framework that allows the electricity industry to cost effectively deliver the changes to enable networks to provide the power needed to deliver net zero across Wales”. In that regard, the Strategy appears joined up in considering the demand - charging infrastructure, alongside the supply - generating station and grid infrastructure.

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.

No comment

Q4a: Do you have access to off street parking?

No comment

Q4b: Please estimate your annual mileage

No comment

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). Please rate in order of importance (1 to 6) your preferred location to charge an Electric Vehicle should you have access to one now or in the future? If you answered No to Q4a Home charging will rank as 6.

No comment

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? Please select most preferable.

In an urban environment

On or as close as possible to the strategic road network

On or as close as possible to the strategic road network with co-located local services if appropriate

No comment

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

There are design implications in relation to the townscape, streetscape and landscape. Are there opportunities to work with design and technology experts to bring forward good design solutions for EV infrastructure, particularly for rapid and fast chargers?

In relation to the proposal for electrical installations in new build, refurbished residential and non-residential buildings to include EV charging facilities, further discussion on the proposal and the links with local authority parking standards, planning conditions and grid capacity is required. We note that pg 4 of the consultation document already refers to the links with Building Regulations. As stated above, it is essential that planning and transport planning work collaboratively at the very start of any plans for new development. Providing a choice and range of sustainable transport options, including access to public transport and active travel, in advance of occupation is a key influence in the long term transport habits formed by occupants.

We support the principle of “destination charging” as set out on page 11. The need for partnership, collaboration and investment is required given the likely lack of power for many destinations in rural Wales.

We have raised in our previous responses the difficulties in North - South travel in Wales and this is recognised on pg17 of the consultation document. This is equally the case in relation to East – West - mid Wales travel. Proactive engagement with partners and early action is needed to address this. The proposed Pinch Point Programme on those routes could well be an opportunity to address this issue.

Along with improved active travel and public transport provision, railways stations and bus stations could prove a suitable charging location. The Welsh Government should also engage with the Irish Government to discuss the provision of charging at the key port locations.

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?

- 1. Total charging provision**
- 2. Quality outcomes**
- 3. Sustainable outcomes**
- 4. Localised benefits**

Please provide any comments you may have in respect of the 4 themes:

We support an outcomes focus of measuring impact. The proposed outcomes within the above themes could be broken down further in some cases to set out more measurable targets within a given timeframe to allow the measuring and tracking over time of impacts on placemaking, including social, economic and environmental value.

Further information on the RTPi Measuring What Matters Planning Outcomes Research can be found here: www.rtpi.org.uk/research/2020/november/measuring-what-matters-planning-outcomes-research/

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

See comments above in relation to measuring outcomes.

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

No comment

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?

No comment

Q8B: Do you hold or do you know of any evidence which would predict different demand?

No comment

Q9: Any further comments?

No comment

Question A: We are under a duty to consider the effects of our policy decisions on the Welsh language, under the requirements of the Welsh Language (Wales) Measure 2011. We would like to know your views on the effects that the strategy would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

No comment

Question B: Please also explain how you believe the strategy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favorably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favorably than the English language.

No comment

Question C: We have a duty to consider the impact of our policies on people or groups who share protected characteristics. Do you think this strategy will deliver positive benefits for people who share protected characteristics? If so, which are the most important?

It will be important to ensure that charging facilities are accessible to those with disabilities and are located in places they are able to use. Equally it will be important that low income households are also not put at a disadvantage and have access to charging facilities.

Question D: Do you think the strategy could have a negative impact on some people or groups who share protected characteristics? If so, what are they and how can we prevent those?

No comment