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Responding to the Electric Vehicle Charging Strategy for Wales consultation

Citizens Advice provides free, independent, confidential and impartial advice to everyone on their rights and responsibilities. We are the statutory representative for domestic and small business energy consumers across Great Britain.

We welcome the opportunity to respond to this consultation. This document is entirely non-confidential and may be published on your website.

Vision (relating to Q1)

We agree with the vision in the strategy 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.'

It is an ambitious target, given the Welsh Government projects another 30,000 - 50,000 fast chargers that need to be installed in Wales and we have less than 5 years remaining to install them, under uncertain times as we deal with a global pandemic. However, it is an important outcome to achieve prior to ending the sale of new petrol and diesel vehicles. Such a move would improve consumer confidence and aid the transition to zero emission forms of transport. Therefore, a clear route map must be developed to reach this goal, appropriately underpinned by resources and the right policy framework at both national and local levels.

Accessibility (relating to Q2 and Q6)

The strategy rightly identifies the need for charging infrastructure to be accessible. However, to make charging accessible by design more stringent detail must be in place and action must be undertaken by multiple parties, in collaboration.

Currently some public chargers are inadequate for the needs for all disabled drivers. For example, the height of chargers may be too high, the curbs allowing access to the chargepoint aren't dropped, there are often bollards (designed to protect charging equipment) that are obstacles to access, the slant of screens can produce glares for the few drivers that may still drive with visual impairments and cables can be heavy and difficult to use for people with mobility problems¹ - to name but a few. And unlike petrol and diesel stations, there may not be employed staff able to support these drivers when they decide to re-fuel.

Some disabled people can be more dependent on cars to get around. It's therefore very important that the infrastructure that is developed is appropriate for this user group. Local authorities must think about these requirements when producing tenders for charging infrastructure. Some useful guidance has been published by the Energy Savings Trust, which begins the thinking of better placement of chargepoints², however it is likely requirements for disabled drivers will need to go beyond this. The question of retrofitting the existing infrastructure should also be tackled in due course.

We would also recommend that the location and environment of en-route chargepoints be carefully considered, in relation to safety and comfort. This must form part of the thinking early on if the infrastructure is to meet minimum usability requirements for all.

Making the right decisions (relating to Q2)

It is right that ambition and pace has been highlighted in this infrastructure strategy. However, the technology will need to be futureproofed so that Welsh consumers can benefit as the market continues to innovate. This means developing infrastructure that can be built upon and adapted easily in the future with open architecture and avoiding the use of closed proprietary systems³.

Local authorities will need to have the right knowledge, resources and skills to support the rollout of electric vehicle chargepoints. This will help them to choose the right

¹ RiDC, [Going Electric](#), 2019

² Energy Savings Trust, Local authority guidance: [Positioning chargepoints](#), 2019

³ BEAMA, [Best practice for future proofing electric vehicle infrastructure](#), 2020

procurement and ownership models, considering local contexts appropriately⁴, coordinate the significant planning implications and manage local risks, such as charging monopolies⁵.

This strategy should also help coordinate the common experiences that drivers should face that local authorities might have separate remits over, such as parking.

Thank you for giving us the opportunity to comment on the EV charging strategy for Wales. We would be happy to discuss any comments made in this letter further.

Yours sincerely,

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⁴ Energy Savings Trust, Local authority guidance: [Procuring electric vehicle chargepoints](#), 2019

⁵ Policy Exchange, [Charging Up](#), 2021