



ACS Submission – Electric Vehicle Charging in Wales

1. ACS (the Association of Convenience Stores) welcomes the opportunity to respond to the National Assembly for Economy, Infrastructure and Skills Committee's call for evidence to inform their inquiry on electric vehicle charging in Wales. ACS represents 33,500 convenience retailers across the UK including fuel retailers such as Rontec, Motor Fuel Group, Co-op, Spar UK, and thousands of independent retailers. There are 7,625 forecourts in the UK with shops, 487 of which are located in Wales¹.
2. We understand and support the need for developing the electric vehicle charging network. To extend the network of electric vehicle charging points in Wales, we believe that the Welsh Government should secure industry cooperation by making a business case for the extension of ULEV infrastructure. The Welsh Government must be able to show how they will incentivise investment, that there is sufficient consumer demand for electric vehicle charging points and that business investments will work to future proof businesses and support current trading models.
3. To grow electric vehicle charging infrastructure in Wales, we believe that the Committee should consider the following recommendations:
 - Deliver meaningful incentives to fuel retailers to extend the reach of EV public charging points on the road network.
 - Avoid mandating businesses to host electric vehicle charging points - only to be used as a last resort if the market does not deliver an effective network.
 - Exempt electric vehicle charging points and the associated car parking space from the rating list.
 - Place ULEV infrastructure in strategic locations that match consumer demands, for example, retail and leisure facility car parks and work places
4. ACS has responded to the relevant sections of the written call for evidence below:

To understand the current charging infrastructure in Wales, and to what extent it is fit for purpose

5. ZapMap estimate there are 18,439 electric vehicle charging points in the UK, as of October 2018². Of the 18,439 charging points, ZapMap estimate that 588 are located in Wales. This refers to the number of charging point connectors rather than the number of locations hosting electric vehicle charging points or the devices themselves.

¹ ACS Forecourt Report 2018 (Forecourts located in Wales with a shop).

² <https://www.zap-map.com/statistics/#location> [Accessed 22.10.18]

6. According to ACS' Forecourt Report 2018, there are 254 electric charging points located on 197 forecourts in the UK³. We do not hold data on the number of electric vehicle charging points on forecourts in Wales.

How the Welsh Government, private sector and third sector can work together to develop EV charging infrastructure

7. As the Automated and Electric Vehicles Act progressed through Parliament, ACS raised concerns that Clause 10, which requires large fuel retailers and service areas operators to provide charging points is not the right approach to increase ULEV infrastructure. Instead, we called on the government to incentivise investment in ULEV infrastructure.
8. Currently, there is uncertainty about electric charging point infrastructure, including the longevity of equipment, if there is sufficient consumer demand, and how the infrastructure will support current trading models. For fuel retailers to invest in electric charging points they would need concrete commitments from the Welsh Government that there will be long term investment in this technology. For the investment to be effective it needs to be across the supply chain for consumers purchasing ULEVs, fuel retailers providing the infrastructure and car manufacturers to produce these vehicles. Uncertainty can lead to businesses being reluctant to invest, and therefore we believe that to incentivise investment from businesses, the Welsh Government should consider dedicated funding and business rate exemptions for public charging points.

Funding for ULEV Infrastructure

9. To provide certainty for fuel retailers, the Welsh Government should consider providing fuel retailers with support to install EV charging points. The Welsh Government should consider how existing funding, or a new programme of funding could be developed for support forecourt retailers in strategic locations across the road network to invest in electric vehicle charging points.
10. At Autumn Budget 2017, the Chancellor of the Exchequer announced a £400m Charging Infrastructure Investment Fund which will provide funding for businesses wanting to provide public charging points. We believe the Welsh Government should consider how the fund can be promoted to businesses and accessed by businesses in Wales to incentivise industry investment in ULEV infrastructure.

Business Rate Exemptions

11. Fuel retailer sites' business rates are based on the turnover of their fuel, shop, and car wash sales. This means fuel retailers pay significantly higher business rates bills than standalone convenience stores, which pay business rates based on the footprint of their store. As such, investing in electric vehicle charging points which would increase the turnover of the forecourt which would increase business rates bill and act as a disincentive to investing in ULEV infrastructure.

³ ACS Forecourt Report 2018

12. Currently there is no provision in the VOA rating manual for the assessment of electric vehicle charging for business rates or the parking spaces that the vehicle occupies to charge, however, this is likely to change at the next business rates revaluation. The Welsh Government should pre-empt this and introduce an exemption for electric vehicle charging points and the associated car parking space from the rating list. This will provide businesses in Wales with the certainty to invest in the new technology without incurring additional tax liabilities.

Whether the electricity grid in Wales is able to deal with a significant increase in EV infrastructure, particularly in rural areas

13. When looking at whether the electricity grid in Wales has the capacity to deal with a significant increase in EV infrastructure, the Committee should also consider whether forecourt retailers have the capacity and connection to the National Grid to provide public charge points on their forecourt. Rapid vehicle charging points require a separate dedicated link to the national grid, this is not available at all fuel sites and would require significant investment in site infrastructure to remedy.
14. The National Grid has acknowledged that there may be issues with the growth of electric vehicle users as the amount of power that can be drawn from the electricity network is limited, which could lead to issues with domestic charging, e.g. when using a charger it could mean that you could not use other high demand electrical items (such as kettles and ovens) without tripping the houses' main fuse⁴. In their report, 'forecourt thoughts: mass fast charging of electric vehicles', they consider whether rolling electric vehicle charging points at fuel retailers would overcome this issue. They only appear to consider the role of supermarket forecourts, and whether charging could be integrated into the shopping experience rather than the forecourt sector as a whole⁵.

To what extent the Welsh Government has acted upon the recommendations in the Low Carbon Vehicle Report

“The need to keep different types of fuel spatially separate could be a more significant barrier in less populated areas where smaller petrol stations, that do not have the space, are more common”

15. We agree with the Low Carbon Vehicle Report's assessment that there could be challenges to delivering electric vehicle charging points in less populated areas where smaller petrol stations do not have the space to install an electric vehicle charging point on their site. Feedback from fuel retailers suggests that to introduce electric vehicle charging points you would need a minimum site footprint of 1 acre. This is to ensure there is sufficient space on site for electric vehicles to wait for long periods of time for their vehicle to charge.
16. There is a practical concern that long waiting times for EV charging will prevent consumers from accessing the store by blocking parking spaces. The current fuel

⁴ [National Grid: Forecourt Thoughts: Mass fast charging of electric vehicles](#)

⁵ [National Grid: Forecourt Thoughts: Mass fast charging of electric vehicles](#)

retailing model in the UK is dependent on shop sales for profitability given the low margins on fuel. ACS' Forecourt Report also shows that only 11% of fuel retailers have seating areas for consumers to wait while their vehicles charge⁶. Therefore, the Welsh Government should consider whether there are more strategic locations in less populated areas where electric vehicle charging points may be more appropriate, for example, at shopping centres, work places or leisure centre facilities.

“Look at the need for hydrogen LCV infrastructure on the strategic road network”

17. In comparison to electric vehicle charging, hydrogen fuel would require much higher levels of investment with even less evidence that a viable exists to justify installation of hydrogen refuelling stations by retailers. We believe the Welsh Government must justify that there is sufficient consumer demand for extending hydrogen refuelling infrastructure.

“Working with members of the Group, the Welsh Government provides a forecast of future refuelling infrastructure coverage on strategic routes without further government intervention and an analysis of whether there will be any strategic gaps, using the TEN-T network as basis for the strategic routes.”

18. In order to promote the use of charging points, the government must understand how and where consumers want to charge. Consumers will be spending between 30 minutes to an hour charging their battery. As part of this work, the government should look to assess the costs, benefits and feasibility of a national network or suitable electric vehicle charging points. This could mean establishing and increasing the number of EV charging points at work places, car parks, established retail locations and leisure facilities to meet consumers charging needs, and where electric vehicle users may stay for longer periods of time.

“Explore further funding possibilities for plugging the gaps under the Connecting Europe Facility.”

“The Welsh Government considers establishing a grant scheme to which town and community councils could bid for installing publicly accessible LCV infrastructure; integration with car clubs or tourism destinations to be reflected in bidding criteria.”

19. As stated above, the Welsh Government should provide fuel retailers with support to install EV charging points. The Welsh Government should consider how existing funding, or a new programme of funding could be developed for support forecourt retailers in strategic locations across the road network to invest in electric vehicle charging points.

⁶ ACS Forecourt Report 2018