

Minister Eamonn Ryan T.D.
Department of Transport
Transport House
44 Kildare Street
Dublin 2

31 May 2022

RE: Electric Vehicle Charging Infrastructure Strategy 2022-2025

Dear Minister Ryan,

Cork Chamber represents 1,200 members together employing 100,000 people throughout Cork city, metropolitan area and county. Our vision is to be a world-leading Chamber of Commerce, delivering on a progressive economic, social and sustainability agenda at the heart of a vibrant business community.

As such, we are determined to ensure that our 203-year-old Chamber continues to create a positive legacy. Our direction is guided by our formal pledge to uphold the United Nations Sustainable Development (SDG) goals, five of which have been identified by the Chambers Ireland network, and stronger integration with our local community and the principles of sustainability, resilience, inclusion, equality and diversity.



The Chamber has examined the strategy and has a series of recommendations and observations that we believe will improve planning and delivery of a comprehensive electric vehicle charging network. We hope the recommendations will contribute to the immensely important task of creating a robust and future-fit Electric Vehicle Charging Infrastructure Strategy 2022-2025.

This strategy comes at a momentous time for Ireland, not only due to the volatility and increases in fuel prices with the ongoing war in Ukraine, but also as Cork and Dublin have both been selected to take leadership positions as two of Europe's leading 100 Climate-Neutral and Smart-Cities. If we are to realise this ambition, every element, player and stakeholder must come together.

Targeted Action Areas

Cork Chamber commends this comprehensive strategy which outlines a pathway to accommodate and facilitate the anticipated aim of placing 1 million electric vehicles (EV) on our roads by 2030. The introduction of charging infrastructure for those who do not have access to home or off-street domestic charging facilities is most welcome and a critical element of meeting the aim of 1 million EVs.

Co-Charging and Workplace Charging

The concept of "co-charging", whereby households may share or rent charging facilities with neighbours is a positive element in this strategy, with particular benefits for urban areas. The possibility of co-charging offers further incentives for homeowners to invest in EVs and EV charging infrastructure. Co-charging is already widespread in the UK, facilitated through platforms such as the Co Charger App¹ which matches hosts with others seeking to charge their EVs. Cork Chamber recommends successful international approaches be considered in implementing this strategy.

The focus on home charging as the dominant form of charging is logical and the benefits are clear, from managing network demand to the potential economic benefits of vehicle to grid energy management systems. However, concerns remain over the distinct lack of measures in the strategy dealing with the responsibilities and opportunities for workplaces or employers to provide workplace charging facilities to their employees. Whether this be a matter for individual employers to manage, or one for Planning Authorities to provide provision for example, a new factory that is given planning permission may be required to have X car parking spaces with Y charging facilities, it should form part of this strategy.

The Department of Transport's Electric Vehicle Policy Pathway Working Group Report (2021) pointed to both the positive effect that workplace chargers have on EV ownerships levels and the large proportion of the Irish populations that do not have access to home charging via off street parking (36%):

*"Workplace chargers can also act as important means of normalising EVs for the wider population. The instance of EV ownership is twenty times higher at workplaces which have chargers installed, and this type of infrastructure is particularly attractive for those without access to off-street parking for home charging (36% of Irish car owners)."*²

While there has been a change in thinking on commuting, with more people working from home, there will still be an element of commuting to and from work for many. The option must be there for employees to charge in workplaces, especially for those unable to access charging at home. We strongly advise that measures to encourage workplace charging be accounted for within the strategy.

¹ <https://co-charger.com/>

² <https://assets.gov.ie/198252/cde9b7e9-1557-4c2f-9876-651ffc79974a.pdf>

Grid Capacity

It is positive that that strategy takes account of the future impacts on the electricity grid of new EV charging infrastructure. The issue of energy security has come to the forefront of Irish society with the war on Ukraine causing disruptions in supply chains. While the likelihood of Ireland facing gas shortages is unlikely³, energy security and security of supply are key concerns.

Grid development and investment must continue apace to meet the needs of new charging infrastructure. In the context of climate action and energy security, we are now presented with an opportunity to transition away from fossil fuels towards renewables. But, at present, power generation can barely keep up with demand and it is essential that grid capacity does not inhibit our renewable electricity potential.

An Bord Pleanála's recent approval for the Celtic Interconnector Project is welcome and will be key to avoiding a situation where supply cannot meet demand and enable the grid to achieve a capacity of 80% renewable energy by 2030. Cork Chamber urges that as the construction phase for the interconnector begins, every opportunity be taken to deliver on timelines for this nationally critical piece of infrastructure to properly facilitate the planned increase of EVs on our roads.

With a history of bottlenecks delaying key investments in grid infrastructure, appropriate contingency planning needs to be integrated into the strategy to avoid a situation where EV charging demands, as a result of higher than expected levels of adoption of electric vehicles, lead to supply and demand balancing issues. Unanticipated levels of demand would also lead to increases in emissions to meet increased electricity demand. Scenario planning that anticipates a range of outcomes for EV adoption and charging demand, with an analysis of implications for differing levels of burden on the grid, should be integrated into the strategy and planning.

Maintenance and enabling EVs in an urban environment

It is vital that this strategy fully enables the rollout of EVs at scale in our urban and metropolitan environments. Cork is on a path to population growth. In the Southern Region, the National Planning Framework (NPF) plans for up to 380,000 additional people and Cork will be home for 60% of these people. Cork will also host up to 135,000 new jobs. It is vital that EV charging infrastructure is planned at a level to meet this growth in population and activity in Cork, and at a regional level.

There is a lack of information provided in this strategy around the maintenance of charging facilities, which raises concerns around 'range anxiety', the fear that when driving an EV it will run out of power and there will be no working charging station close by to re-charge it. Cork Chamber advises that the strategy include specific measures to ensure consistent maintenance and monitoring of EV charging infrastructure to make sure that all charge points are working consistently. This is a key element to enabling the adoption of EVs throughout Cork City and County and nationally.

Just Transition

Cork Chamber commends the inclusion and support of a Just Transition throughout the strategy. This being said, in Ireland there is an acute gap in the provision of accessible EV chargers for drivers with disabilities. It is imperative that any future strategy contributes to a Just Transition, taking into account the varying abilities and needs of every community and cohort.

³ <https://www.sciencedirect.com/science/article/abs/pii/S030626191730171X>

According to the 2016 Irish Census there are 643,131 people living in the country with a disability, making up 13.5% of the population⁴. Yet, there are only four wheelchair accessible EV charge points in the country, with only another four to be completed by 2030⁵. This is only one consideration of many when designing inclusive and accessible charging infrastructure.

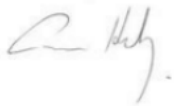
This strategy and the forthcoming infrastructure have the opportunity to reduce social injustice and improve the well-being of the disadvantaged, which will ultimately play a significant role in the anticipated societal transformation associated with climate action. It would be welcome both for the strategy to include an overall target figure for the number of EV charge points nationally planned and the percentage of those charge points that will be fully accessible.

The lack of charging facilities that account for the varying needs of our population must be reversed through this strategy. We urge the Department to consider the design and accessibility of charging stations from a mobility and accessibility point of view in all future charging infrastructure.

Conclusion

This strategy offers Cork a real opportunity to support Government's ambition of placing 1 million EVs on Irish roads along with the aim for Cork to be a climate-neutral smart-city by 2030. In the context of a volatile energy market, geopolitical instability, and a climate emergency, this strategy could not have come at a more opportune and pressing time. We commend the Department of Transport for their work on this strategy and request that our recommendations are fully considered.

Yours Sincerely,



Conor Healy

CEO

⁴ <https://www.cso.ie/en/releasesandpublications/ep/p-cp9hdc/p8hdc/p9d/>

⁵ <https://www.irishexaminer.com/news/arid-40751952.html>