

**Submission to the Department of Transport consultation on the Electrical Vehicle  
Charging Infrastructure Strategy**

31 May 2022



## **Introduction**

The Western Development Commission (WDC) is a statutory body with a remit to promote and encourage economic and social development in the Western Region (counties Donegal, Sligo, Leitrim, Mayo, Galway, Roscommon, and Clare). The WDC operates under the aegis of the Department of Rural and Community Development. We welcome the opportunity to make a brief submission on the Electrical Vehicle Charging Infrastructure Strategy.

The WDC regards the provision of quality transport infrastructure, and in this case Electric Vehicle (EV) charging infrastructure, as essential to underpin the economic and social development of the Western Region. Our region is very rural with 65% of the population living outside of towns of 1,500 and 80% living in the countryside and settlements smaller than 10,000 people. Our focus in relation to transport policy is on regional and rural accessibility to opportunities and services, both within our region and beyond, through a variety of transport modes. The WDC recognises the importance of the low carbon transition and is particularly concerned that the issues for our region are addressed<sup>1</sup>. The development of EV charging infrastructure is, therefore, very important to our region.

## **Our Submission**

1. We welcome the recognition of the importance of improved accessibility and equal access to EV charge points as part of a Just Transition to sustainable mobility, as specified in the Electrical Vehicle Charging Infrastructure Strategy.
2. We are pleased that the Strategy acknowledges the importance of EV charging for rural residents and the likely different patterns of charging and charging opportunities. The focus on charging for rural residents is very important. However, it is also essential that, in the context of rural areas, the needs of those travelling to rural areas are considered. Many rural journeys are made by tourists, those travelling for work, enterprise and leisure. The WDC is concerned that EV drivers should not be deterred from visiting the more rural parts of the region because of actual, or perceived, lack of EV charging opportunities.
3. While many rural residents can charge at home, overnight and day visitors may have fewer opportunities. This category needs more consideration, especially as tourists and other visitors are likely to be concentrated at particular times (summer, weekends and other holiday periods). Visitor numbers can easily exceed those of the local population, their demand for charging infrastructure is likely to occur at particular peaks. Addressing their needs, in the context of rural EV charging infrastructure is important. When considering tourists it is important to have a broader focus than tourist hotspots so that less visited places do not have any disadvantages compounded.
4. In order to ensure widespread development of EV charging infrastructure in rural areas it could be useful to set a target for a maximum distance to travel to an EV charger. The most appropriate distance could be determined following analysis of average distance to public EV charging (similar work has been done by the CSO in relation to access to working hubs and childcare<sup>2</sup>) and examination of work carried out elsewhere. Analysis published in 2016 for the EU examined means of allocating charging locations in rural areas<sup>3</sup>. It suggested a maximum distance of 30 km

<sup>1</sup> See here for more on our work on the low carbon transition <https://westerndevelopment.ie/insights/making-the-transition-to-a-low-carbon-society-in-the-western-region-2/>

<sup>2</sup> <https://www.cso.ie/en/releasesandpublications/ep/p-drwhc/distancetoremoteworkhubsandchildcareservicesfebruary2022/>

<sup>3</sup> [https://publications.jrc.ec.europa.eu/repository/bitstream/JRC101040/allocatechargingpoints\\_sciencepolreport\\_eurreport\\_online.pdf](https://publications.jrc.ec.europa.eu/repository/bitstream/JRC101040/allocatechargingpoints_sciencepolreport_eurreport_online.pdf)

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between charging stations on the main road network. The definition of 'main road' did not include Highways (which in Ireland might be the equivalent of Motorways and national primary roads). Their focus was on the equivalent of national secondary and regional roads. The expectation in the analysis was that resulting infrastructure would cover also the smaller roads (up to an additional 20 km distance). Other locations might also provide opportunities. In the US a 2017 study suggested that "installing chargers in rural downtown areas helps turn small towns into destinations for EV drivers, spurring new economic development, reducing range anxiety, and encouraging EV adoption among residents.<sup>4</sup>". Charging infrastructure at remote working hubs could also provide multiple advantages. Analysis specific to Ireland would be needed to determine a maximum distance, and best locations for public EV charging.

5. We welcome the recognition of the role of Local Authorities in the provision of public EV charging infrastructure and believe that analysis of charging locations and appropriate supports would enable provision of widespread charging.
6. In planning for EV charging infrastructure, it should be remembered that while the range of EVs has increased significantly in recent years, maximum range is often not achievable. Drivers may not always anticipate the impact cold weather, rain, wind, darkness or undulating terrain can have on their range. Likewise, there is often occasion for unplanned or unexpected diversions including getting lost. These all influence the need for widespread EV charging infrastructure in rural areas available to those who are not resident.
7. Although the widespread provision of EV charging is important, it must be recognised that demand for chargers will not be consistent. Nonetheless they are serving an important back up function. They are not likely to be commercially viable and will require public support in recognition of the wider benefits they provide to the rural areas.
8. While we welcome the commitment to improving the availability of high powered en-route charging infrastructure on the strategic road networks, what is meant by the strategic road network is not defined. There are few motorways in our region (M6 and M17 are key) and even the network of national primary routes is relatively sparse. Thus, it is important that a broad definition of the strategic road network is used in this context. High powered en-route charging is especially important to those traveling long distances to more peripheral areas.
9. When considering charging locations, it is important to ensure that there is good quality mobile network coverage where the EV chargers are sited. Mobile data exchange is integral to the smooth operation of the EV charging process, and coverage problems slow the charging experience and may prevent charging.

The WDC is currently developing a Mobility Index for 35 small towns in our region (population 1,500-10,000 in Census of Population 2016). One of the indicators being used to create this composite index measures the number and type of EV charging facilities currently available in each of these towns. In collecting the data, we have noticed significant variation in charging availability and type among the towns across the region. It is important that there is a consistent standard of availability so that EV users, as discussed above, can confidently rely on charging availability. We expect to publish the WDC Town Mobility Index in Q4 2022, but if you would like information about it before that please get in touch.

We welcome the opportunity to make a submission to the consultation on the Electrical Vehicle Charging Infrastructure Strategy. If you would like any more information or to discuss our submission further, please get in touch with me.

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<sup>4</sup> <https://www.eesi.org/articles/view/beyond-cities-breaking-through-barriers-to-rural-electric-vehicle-adoption>

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