



EVBnb.ie response to Electric Vehicle Charging Infrastructure Strategy 2022-2025

May 30th 2022

EVBnb.ie response to Electric Vehicle Charging Infrastructure Strategy 2022-2025



Table of Contents

.....	1
Can I afford to buy?	3
When I buy will I be able to charge my EV?.....	3
If 40% of drivers cannot install home-chargers, how can they charge EVs?.....	4
Residents using on-street chargers are differentiated from those using home-chargers. Why?	4
Implement revisions of the Energy Performance of Buildings Directive (EPBD) into Irish law asap	5
Will SEAI 70% apartment chargers-hub grant have much of an impact by 2025?.....	5
Would any prospective “right to charge” law give tenants ability to install chargers?	5
Does public charger network meet demand?	6
What is the impact of poor public charger network?.....	7
Lack of public chargers prompting many to buy Hybrids.	7
Public charger issues in Dublin acute in 2022.....	7



EVBnb.ie response to Electric Vehicle Charging Infrastructure Strategy 2022-2025

May 30th 2022

Older BEV models need accommodation but should not dominate charger sites as they do at present.	8
Esb-Network work in the interest of other esb group companies such as esb-eCars. This is understandable but DoT and SEAI and other gov agencies have to ensure EV owners and taxpayers interests prioritised.	9
DoT need to meet international CPOs such as FastNed, Gridserve, bp-Pulse and Shell to explore barriers they are encountering in Ireland as explosion in BEV sales need chargers in the ground very quickly.	9
Destination or “charge when parked” chargers	10
Workplace and businesses need incentive and grants to install chargers.....	10
BEVs can be zeroCarbon as work well with domestic PV installations providing excess PV to charge BEV from early April to end of September.	12
Appendices.....	13
Appendix 1: EVBnb.ie facebook ads survey March 2022	13
Appendix 2: Projected BEV sales to 2025.	26
Appendix 3: CSO 2016 Tenure by age of householder.	27
Appendix 4: ChargeUp Europe Making the Case for Private Charging under the Energy Performance of Buildings Directive	28
Appendix 5: League table for CCS EV owners looking for a rapid chargers 150kW+	29



EVBnb.ie response to Electric Vehicle Charging Infrastructure Strategy 2022-2025

May 30th 2022

The decision a driver makes regarding purchase of a Battery Electric Vehicle (BEV) is based on 2 questions.

- Can I afford to buy?
- When I buy will I be able to charge my EV?

Can I afford to buy?

SEAI grant schemes have encouraged many owners to purchase BEV. However potential EV owners who filled in Q,2,3 in survey in Appendix 1 below show that a mix of new incentives listed are needed as BEV market matures. Projected sales of new BEVs up to 2025 not including Hybrids is 166k in Appendix 2 so likely grants for new BEV may reduce after end of 2025 and BIK before then, so some of below needed to incentivise 2nd-hand buyers and new buyers facing affordability issues.

- 2,500 2nd-hand grants from approved dealers. *(high % support Q2 Appendix 1)*
- Zero VAT on imported BEV from UK or all 2nd-hand BEV
- Zero or low % green loans to purchase EV. *(high % support Q3 Appendix 1)*
- Scrappage scheme. *(high % support Q4 Appendix 1)*

When I buy will I be able to charge my EV?

The extract below from the Department of Transport DoT Infrastructure Strategy 2022 to 2025 indicates that the strategy 2022 to 2025 is based on 75% of drivers being able to install home chargers.

Central Statistics Office (CSO) figures would suggest 40% of drivers are renting homes. SEAI grants for apartment hubs and chargers are unlikely to have an impact by 2025 as it will take a few years to engage and work through issue with each Owners Management Company OMC.

“Approximately three quarters of Irish car owners have access to private off-street parking with the option of installing lower power charge points (c. 3.4kW-11kW) that can be connected to domestic electricity supplies. Home charging allows electric vehicles to be parked, plugged in”



EVBnb.ie response to Electric Vehicle Charging Infrastructure Strategy 2022-2025

May 30th 2022

If 40% of drivers cannot install home-chargers, how can they charge EVs?

Today many owners cannot buy a BEV as they have no facility to charge their future BEV overnight. In the future they may be car-free zones in cities but even in cities with low car-ownership such as Freiberg which only has 40% car ownership, BEV on-street charging facilities are incentivised and EV ownership encouraged.

There are little or no on-street charging initiative in Ireland, but DoT Strategy at least explores their benefits.

50%+ of owners in survey in Appendix 1 indicate they already own a BEV and same number shown in Q7 re on-street chargers. However, many the remaining 50% who do not own BEV are knowledgeable enough to realise that they need an overnight EV charger 100m from their home.

Residents using on-street chargers are differentiated from those using home-chargers. Why?

Both groups identical as on-street with residential parking permits and home chargers are both used overnight. Every proposed 11kW on-street charger could be replaced with 2 x 7KW or 3 x 3.7KW meeting needs of more future EV owners.

Barriers to use of public lighting network need to be removed immediately. Lamp-post chargers can act as a meter on unmetered lighting networks, so regulator CRU needs to clarify regulations to encourage large international CPOs to install on-street chargers in bulk.

Shell-Ubitricity has a target of 50k lamp-post chargers on residential streets in UK by 2025. DoT should aim for similar number=3k in Ireland so the current 20 lamppost chargers in Ireland should be increased to 3k but outside city centres and busy streets and just targeted at residential streets with 8pm to 8am parking permit associated with charger. Low-power 3.6kW changers on lighting network ok for resident's needs as 12 hours overnight gives 43kW charge.



EVBnb.ie response to Electric Vehicle Charging Infrastructure Strategy 2022-2025

May 30th 2022

Implement revisions of the Energy Performance of Buildings Directive (EPBD) into Irish law asap

There is no quick route to provide chargers in existing apartment blocks and in public buildings but DoT and SEAI could try to implement “Charge-Up Europe” recommendations re European Commission’s revision of the Energy Performance of Buildings Directive (EPBD) listed in Appendix 4 below as this would force existing apartment blocks to install ducting, charge-hubs and increase MIC.

Will SEAI 70% apartment chargers-hub grant have much of an impact by 2025?

Although new building regulations will ensure tenants and owners at new apartment blocks can install chargers, existing apartment blocks may take a few years as SEAI will need to work with owners and owner’s management companies OMCs to persuade owners to raise the 30% required to install apartment charger-hubs and any increase of maximum import capacity MIC needed for extra electricity.

Would any prospective “right to charge” law give tenants ability to install chargers?

To trigger a tenant’s “right” to a charger, charger- hubs and extra MIC would need to be in place in larger blocks first. That make take a few years to implement.



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May 30th 2022

Does public charger network meet demand?

No.

Most BEV drivers need to make periodic long journey. Modern EVs can complete most outward journeys but lack of “destination” or “charge when parked” chargers at destinations mean drivers need to charge early on return leg of journey.

The current network already having issues at peak times at motorway hubs. Esb-eCars plan to install 52 rapid HPC chargers as site upgrades should be expedited.

Tesla network expanding but will have to wait to see how many hubs are opened to nonTesla BEVs.

The 50kW network expanding slowly but hopefully easyGo and Eir’s plans for 180 chargers by end of 2023 bears fruit. There are useful as fast chargers also needed as a supplement to slow-destination network. The slow-destination network is backbone of most countrys network but is the missing link in irish network.

To illustrate importance of destination-chargers, I can drive from Galway to Dublin and use a workplace charger there for 5 hours charging at 7Kw which is enough to topup battery for full return journey to Galway. No need to use public-network and my use of destination charger frees up motorway chargers for others. 10 to 20k 7kW and 11kW banks of destination chargers needed to match other country’s networks.

Q5 in Appendix 1 showing 64%+ in favour of expansion of destination slow charger network and Q6 showing support for expansion of rapid network.



EVBnb.ie response to Electric Vehicle Charging Infrastructure Strategy 2022-2025

May 30th 2022

What is the impact of poor public charger network?

Lack of public chargers prompting many to buy Hybrids.

Hybrid outselling BEV at ratios of 2 Hybrid to 1 BEV which is opposite of trend in other countries where BEV outsell Hybrid. This can only be due to poor Irish public charger network. Almost 60k EVs on the road are mostly hybrid where tardy charger rollout has thwarted many owners ambition to own a full BEV.

Public charger issues in Dublin acute in 2022.

Dublin has just 20 fast chargers. Although many existing BEV owners in Dublin have home-chargers, there are about 1,000+ BEV taxis bought under small public service vehicles eSPSV scheme. Taxi's do about 2.5 times more mileage than other cars so need access to public chargers between fares and many taxi drivers are renting or have no off-street parking so no access to home chargers.

This means that 1,000+ taxis and EV travellers to Dublin are competing for just 20 chargers. Taxi firms have no expertise in managing chargers and numbers of slow "destination" chargers in park+ride or other car parks on outskirts of city or M50 ring are very low. **This is already leading to queues at chargers and likely to become an acute issue before end of 2022 and needs urgent action.**

DoT run Active-Travel and BEV as 2 separate entities, but they could complement each other

BEV charged from home-PV in summer can make zeroCarbon trips to city and if PV chargers existed at park+ride, drivers could park+charge and jump on bike and use other Active-Travel city schemes. However, it's not possible to do that in Ireland, not many park+ride spaces and almost no chargers.

Other countries don't make those distinctions and fund chargers at edge of car-free zones so can walk/bike to EV and drive on to destination.

There's a crazy setup in Ireland where chargers near greenways discouraged while in practice many of the bikes brought to the greenway for a day out are transported there in diesel SUVs.



EVBnb.ie response to Electric Vehicle Charging Infrastructure Strategy 2022-2025

May 30th 2022

Older BEV models need accommodation but should not dominate charger sites as they do at present.

Appendix 2 shows a guesstimate of 166k BEV by 2025. 8k EVs reg in 2021, 15k on target for 2022 and maybe 26k for 2023. Old Zoes and Leaf may be less than 5% of total BEV by end of 2023 but % of 22kW/Chademo on network & influence of their owners on DoT far outweigh their numbers on the road.

The majority of BEVs today and vast majority in 2025 have CCS sockets for fast DC charging. Most 3-phase models charge at 11kW AC and many single-phase charging at 7kW. That is reflected in other countries where 70 to 90% of chargers are less than 22 kW and most 7 kW.

However Irish public network, especially esb chargers are 50% Chademo which are used exclusively by Leaf. 22KW AC charger only supply full 22KW to Zoe and a few 3-phase models. Most BEV plugged into 22KW can only charge at 11 and 7KW.

Why not triple number of public AC chargers by replacing every non-motorway 22KW AC pedestal with 6 x 7kW using same existing grid supply used by old 22KW pedestal?

Although 1 Chademo plug needed at sites with just 1 charger, CCS dominance should be reflected in minimum of 75% CCS DC charger plugs at sites when 2 or more chargers.



EVBnb.ie response to Electric Vehicle Charging Infrastructure Strategy 2022-2025

May 30th 2022

Esb-Network work in the interest of other esb group companies such as esb-eCars. This is understandable but DoT and SEAI and other gov agencies have to ensure EV owners and taxpayers interests prioritised.

The rapid or high-power charger (HPC) network has 3 charge point operators (CPO). Tesla are the largest with 8 hubs and 42 rapid chargers. Esb-eCars next with 28 150kW and 200kW chargers and Ionity 3rd with 22 350kW chargers.

Tesla expanding and have opened their network to nonTesla BEV in many counties including UK so may include Ireland in the future.

Esb eCars have plans to upgrade existing sites from older single DC 50KW chargers to rapid 150KW or 200KW chargers. However, although there are 52 rapid chargers funded by taxpayers under tender ending in 2022, the rollout of these chargers is delayed to the end of 2023. It in BEV owner's interest that these existing sites are upgraded asap and would also close gap with Tesla and ensure both compete and provide more chargers to BEV owners. 4 installs in 2022 show about 1 install per month but needs to be 3 sites per month to end of 2022.

DoT need to meet international CPOs such as FastNed, Gridserve, bp-Pulse and Shell to explore barriers they are encountering in Ireland as explosion in BEV sales need chargers in the ground very quickly.

WV-Elli 150kW battery-buffer rollout of 8,000 chargers in UK and EU in bp and aral fuel stations is something that suits Ireland as those chargers work with existing low volt LV grid connections. They have the funding to wait a few years for return on investments so alternative to state funding. <https://electrek.co/2022/04/28/volkswagen-group-and-bp-partner-to-deploy-up-to-8000-ev-chargers-across-eu-uk/>

bp have stations in Northern Ireland so they could be encouraged by DoT to install some 8,000 150 kW Flexpole battery-buffer chargers as part of Shared Island initiative.

Shell ubitricity have extensive lamppost networks in other countries that can be used as overnight chargers by residents renting or without driveways so could expand their small pilots in Ireland.

FastNed and Gridserve have extensive networks in UK and EU so DoT should explore if they would add hubs in Ireland.



EVBnb.ie response to Electric Vehicle Charging Infrastructure Strategy 2022-2025

May 30th 2022

An interesting case study is Circle-k. <https://evbnb.ie/2022/02/24/circle-k-76-chargers-in-ireland/> details Circle-k's 1000 chargers in Europe. Norway (629), Sweden (192), Denmark (76) and Ireland (76).

However Ireland unique in the 4 markets. 40% on average of the chargers in Norway, Sweden and Denmark are installed, and managed "own brand" Circle-k chargers. In Ireland just one of the 76 chargers in Circle-k sites in Ireland is "own brand" and 75 others esb and lonity. Are expensive grid upgrade and substation costs in Ireland deterring private investment in charger hubs?

Destination or "charge when parked" chargers

The DoT strategy classed Destination as mainly fast DC chargers. Although it is good to have a mix, the vast bulk of destination or "charge when parked" charger are 7KW with some 22KW as many BEV can only charge at 7KW or 11KW AC anyway and many parked for 2 to 3 hours for a topup.

Q5 in survey in Appendix 1 show 64% in favour of expanded slow destination "charge when parked" network.

The "mix" with some 50KW DC is needed though and easyGo setup in many Lidl stores with paid 50KW fast DC and other free slow chargers is to be welcomed. The rollout of 50KW DC by easyGo and EIR with reuse of old Eir phone sites is a good model to follow such as the recent 4 50kW DC and 3 22KW AC In county Carlow.

2 to 3 rapid urban hubs such as the Shell Recharge rapid hub in London needed in Dublin. Telsa rapid hub wil open in Sandyford but will have to wait to see what parts of Tesla network in Ireland will be opened up.

Workplace and businesses need incentive and grants to install chargers

ACA relief on workplace EV chargers provided by gyms, shops etc not enough as in most cases just amounts to 12.5% rebate. Need ACA in addition to a new charger grant.



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May 30th 2022



EVBnb.ie response to Electric Vehicle Charging Infrastructure Strategy 2022-2025

May 30th 2022

BEVs can be zeroCarbon as work well with domestic PV installations providing excess PV to charge BEV from early April to end of September.

Domestic PV installations are grant aided by SEAI. However, most are designed and sized for just electricity usage in home. In the future many of those home will have a BEV parked outside so bonus grant should be applied to encourage home owners to install the maximum of PV panels as excess will always charge BEV.

Answer to Q5 in survey re importance of workplace and car-park workplace or destination chargers shows huge support at 64%.



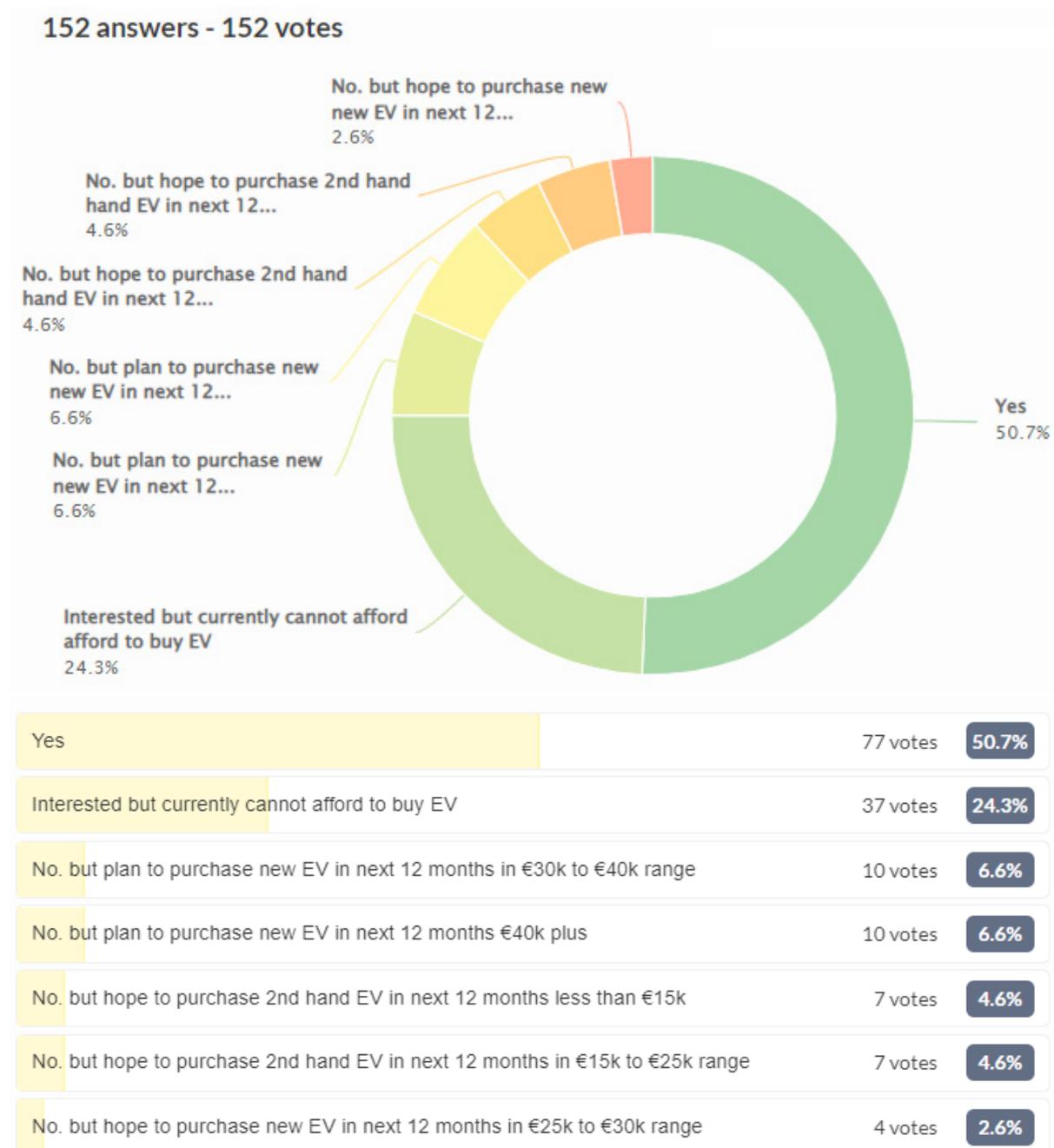
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May 30th 2022

Appendices

Appendix 1: EVBnb.ie facebook ads survey March 2022

Q1: Do you already own an EV?





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May 30th 2022

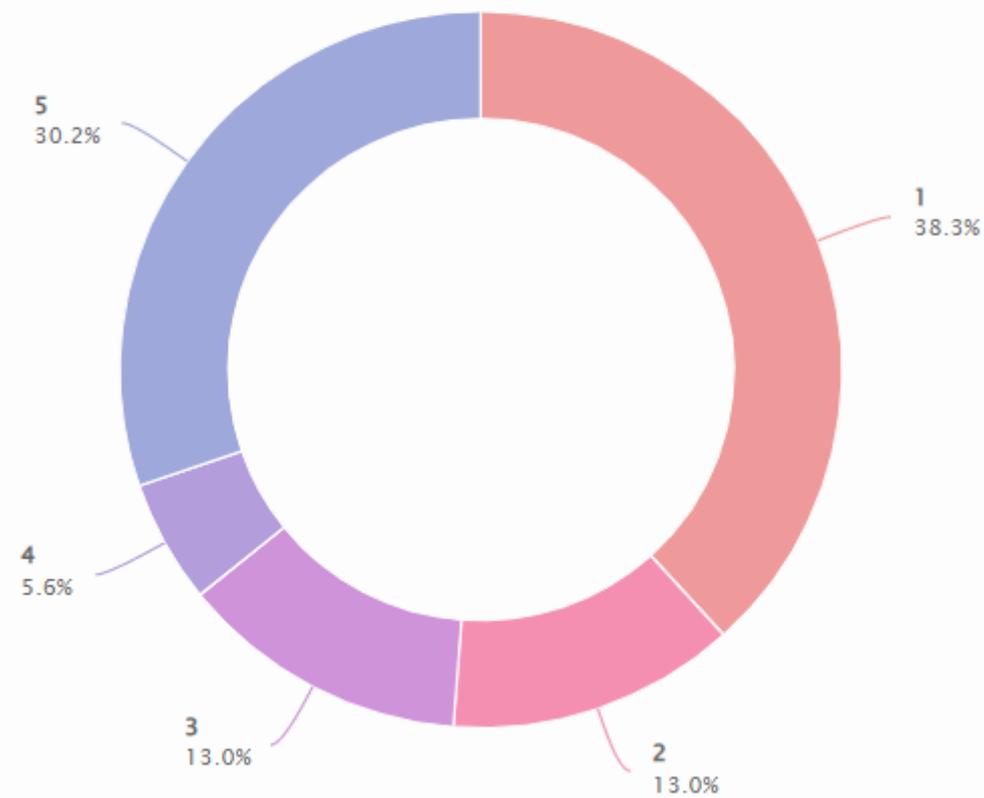
Q2: €2500 grant for 2nd-hand EV sold by approved dealer important to help me buy!

1=Most Important

5=Not Important / Already own EV

162 answers - Average of 2.8

[View summary](#)



1	62 votes	38.3%
2	21 votes	13.0%
3	21 votes	13.0%
4	9 votes	5.6%
5	49 votes	30.2%



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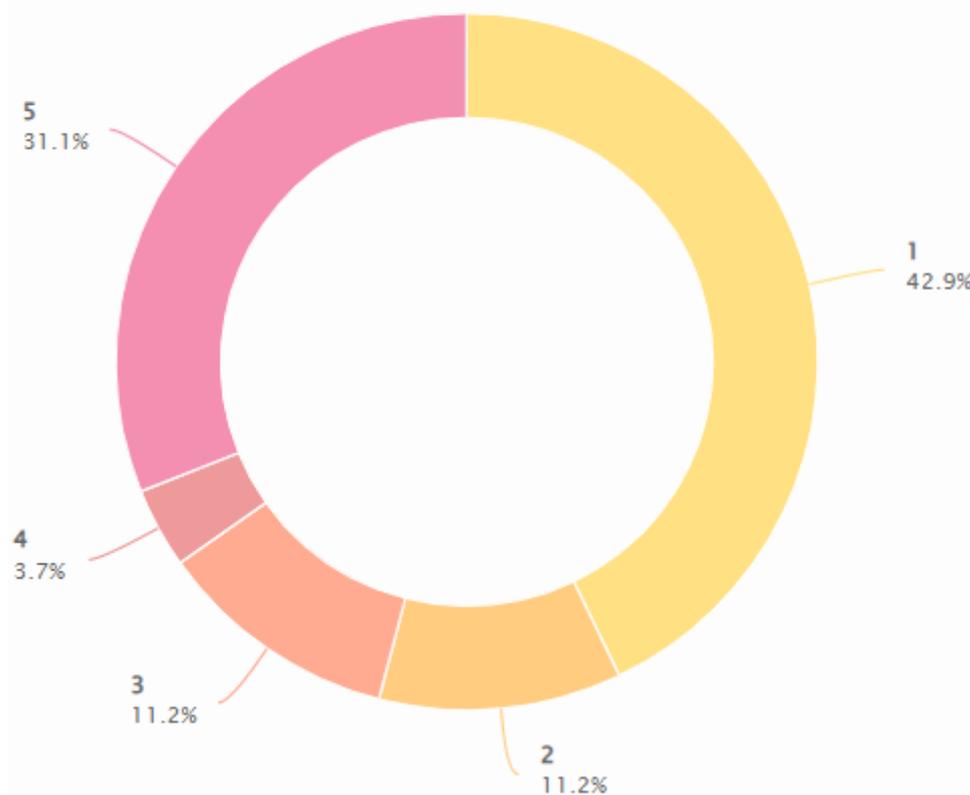
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Q3: New EV from €30k to €40 after SEAI grant still beyond my budget with loan or PCP. A government zero% loan to max of €30k over longer term would help me buy.

1=Most Important

5=Not Important. Already own EV

161 answers - Average of 2.7



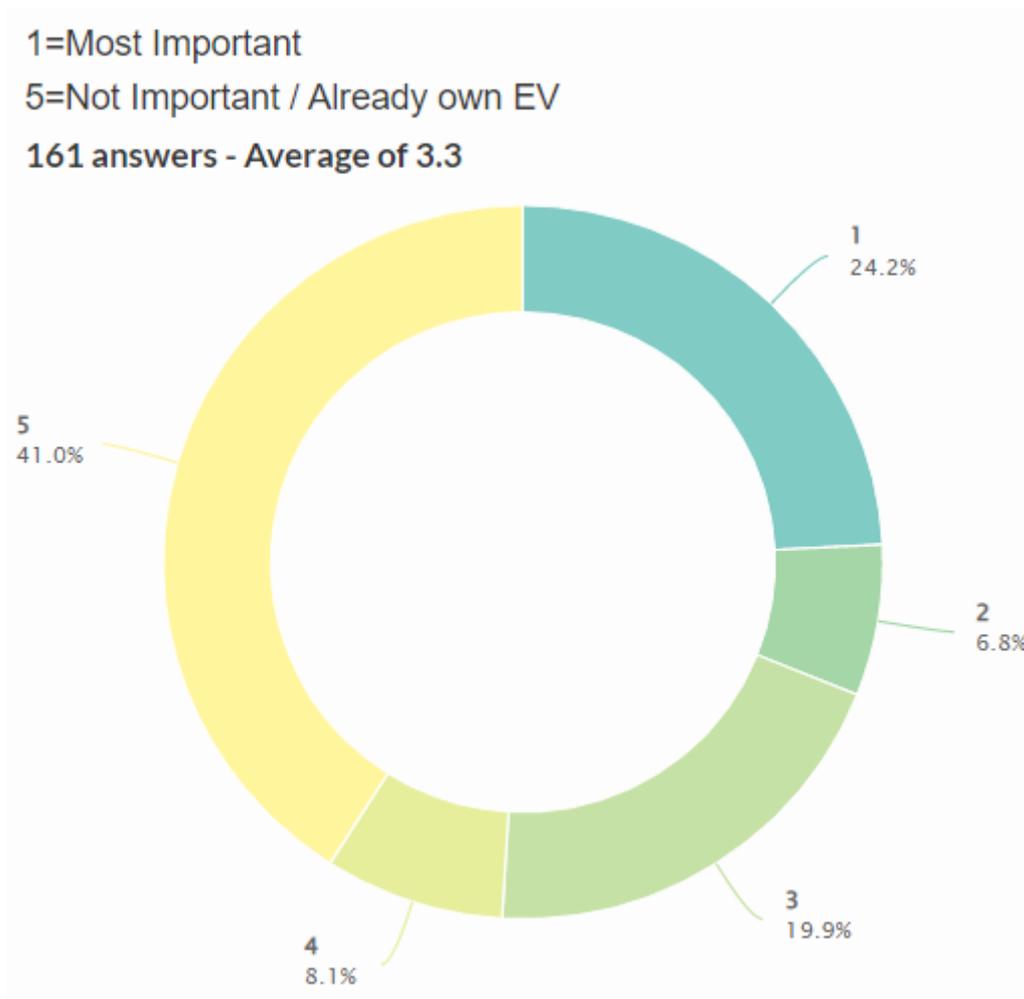
1	69 votes	42.9%
2	18 votes	11.2%
3	18 votes	11.2%
4	6 votes	3.7%
5	50 votes	31.1%



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May 30th 2022

Q4: My car is running ok so I will only buy EV when a scrappage scheme is introduced to trade in my existing car against new or 2nd-hand EV.



1	39 votes	24.2%
2	11 votes	6.8%
3	32 votes	19.9%
4	13 votes	8.1%
5	66 votes	41.0%



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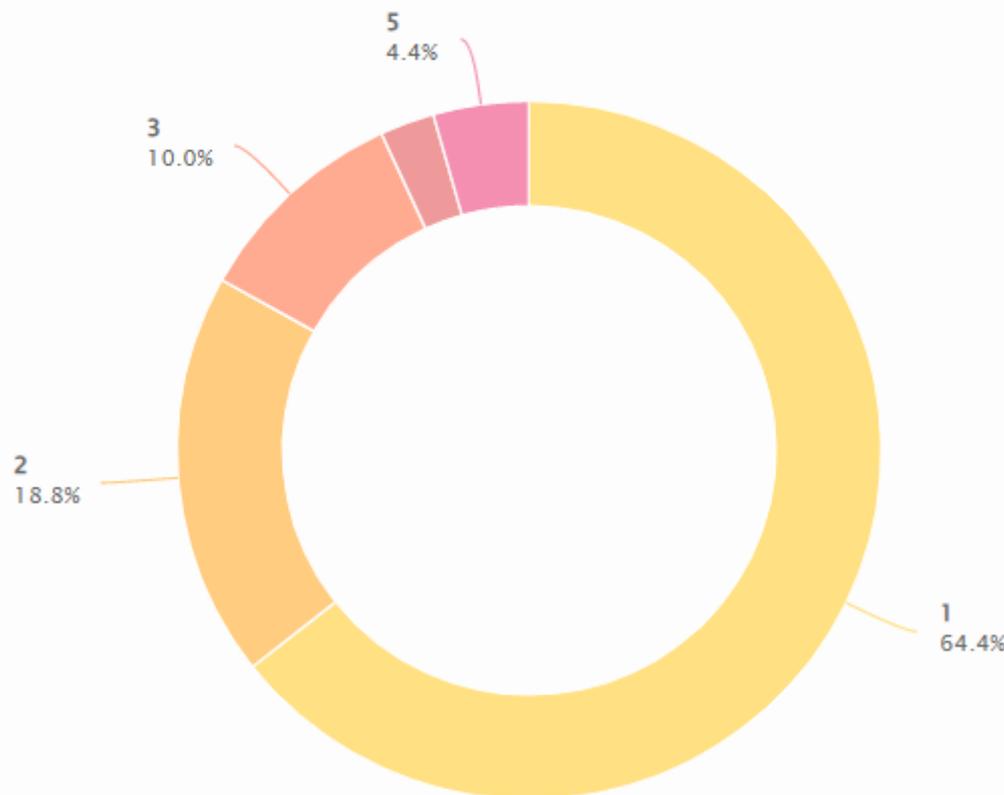
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Q5: Multiple destination chargers at workplace or public car parks are crucial as I would prefer that my future or current EV is charging while parked rather than stopping at public charger later on journey home

1=Most Important

5=Not Important: No need to charge when EV parked

160 answers - Average of 1.6



1	103 votes	64.4%
2	30 votes	18.8%
3	16 votes	10.0%
4	4 votes	2.5%
5	7 votes	4.4%



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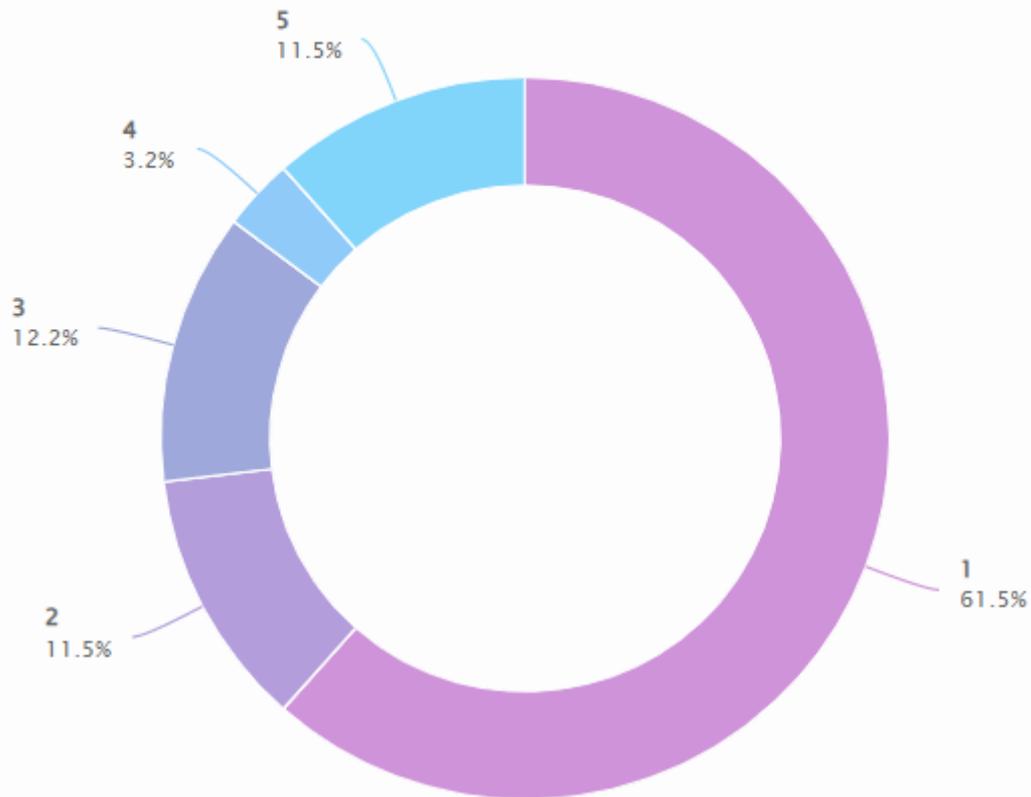
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Q6: I own an EV and make a long distance trip in my EV periodically. Availability of fast DC charger is crucial so need hub with minimum 3+ DC CCS 1 Chademo and 1 separate 22kW AC

1=Most Important

5=Not important: Network today meets my needs

156 answers - Average of 1.9



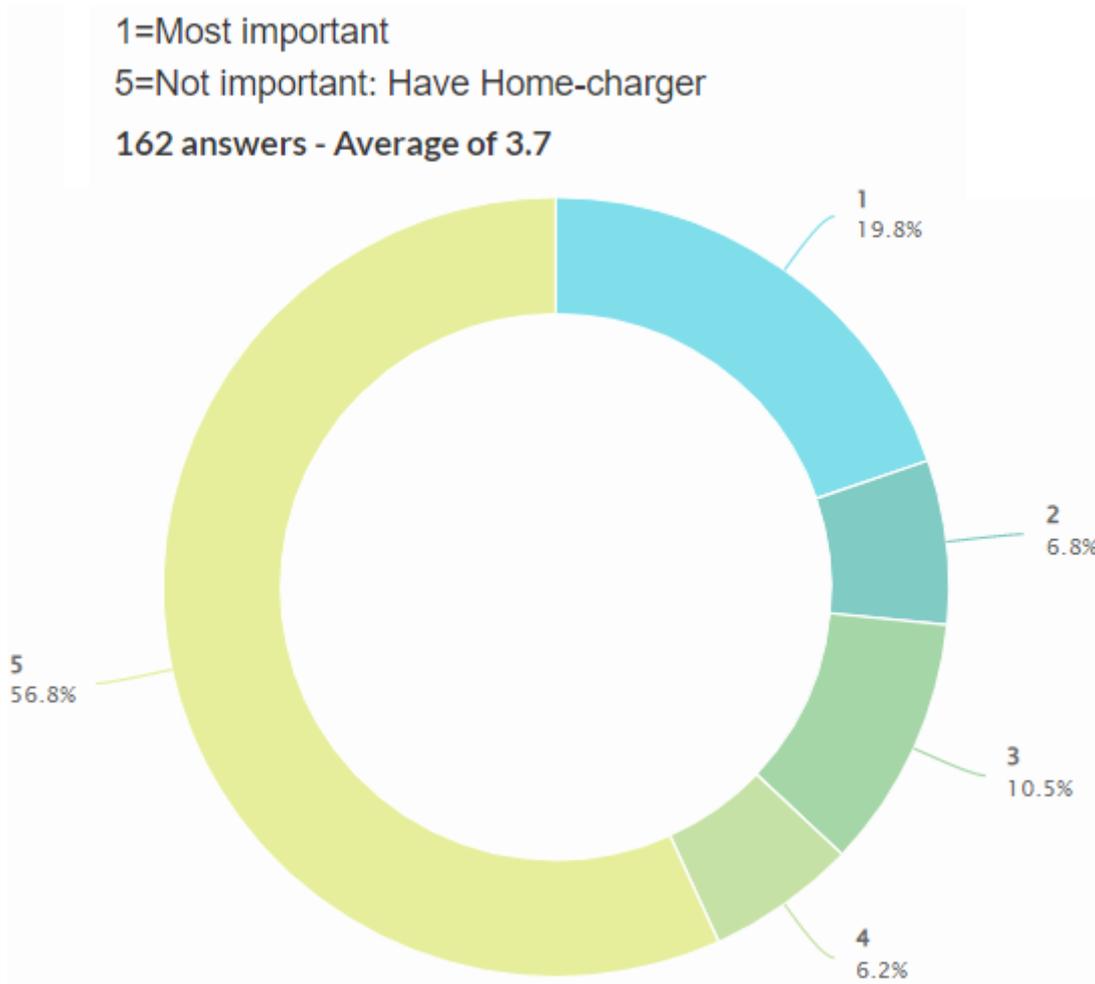
1	96 votes	61.5%
2	18 votes	11.5%
3	19 votes	12.2%
4	5 votes	3.2%
5	18 votes	11.5%



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May 30th 2022

Q7: Provision of secure on-street EV charger 100m from where I live for overnight charging is important?



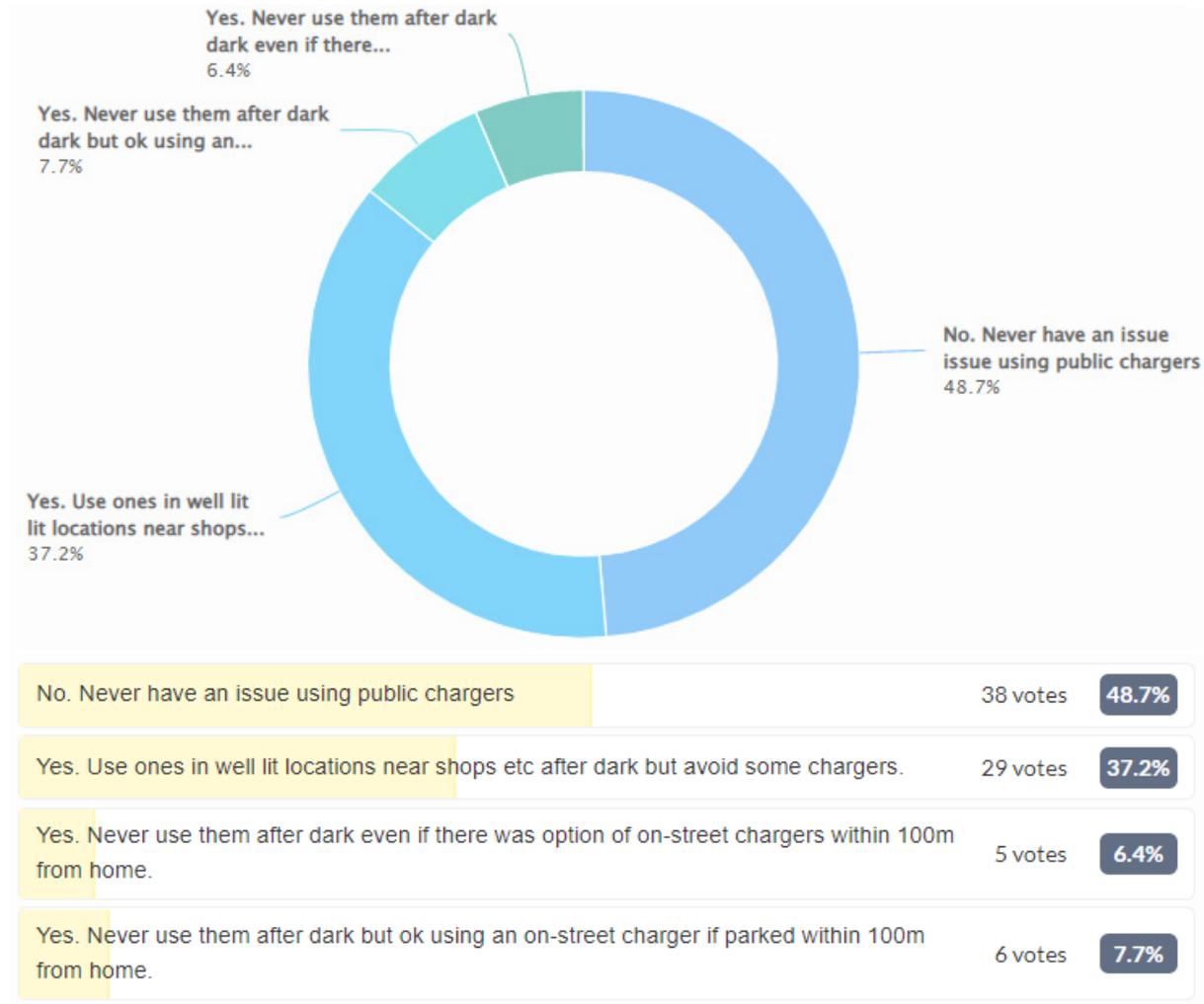
1	32 votes	19.8%
2	11 votes	6.8%
3	17 votes	10.5%
4	10 votes	6.2%
5	92 votes	56.8%



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May 30th 2022

Q8: Are there times when you do not feel secure using public chargers?





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May 30th 2022

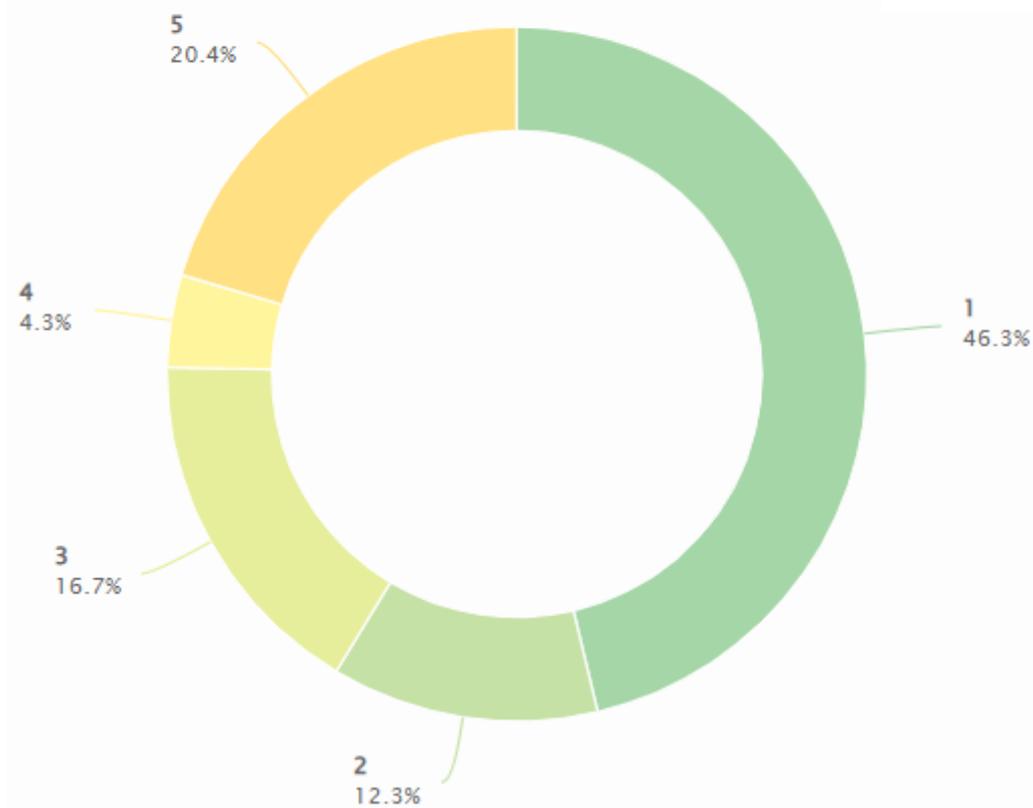
Q9: Do you or your friends stay at airBnBs in Ireland? Do you think €600 home-charger grants should be extended to airBnB home owners to provide 7kWh overnight charging for guests?

1=€600 2=€400 3=€200

4=€100 voucher to check external 3-pin with 16A RCBO safe.

5=No grant

162 answers - Average of 2.4



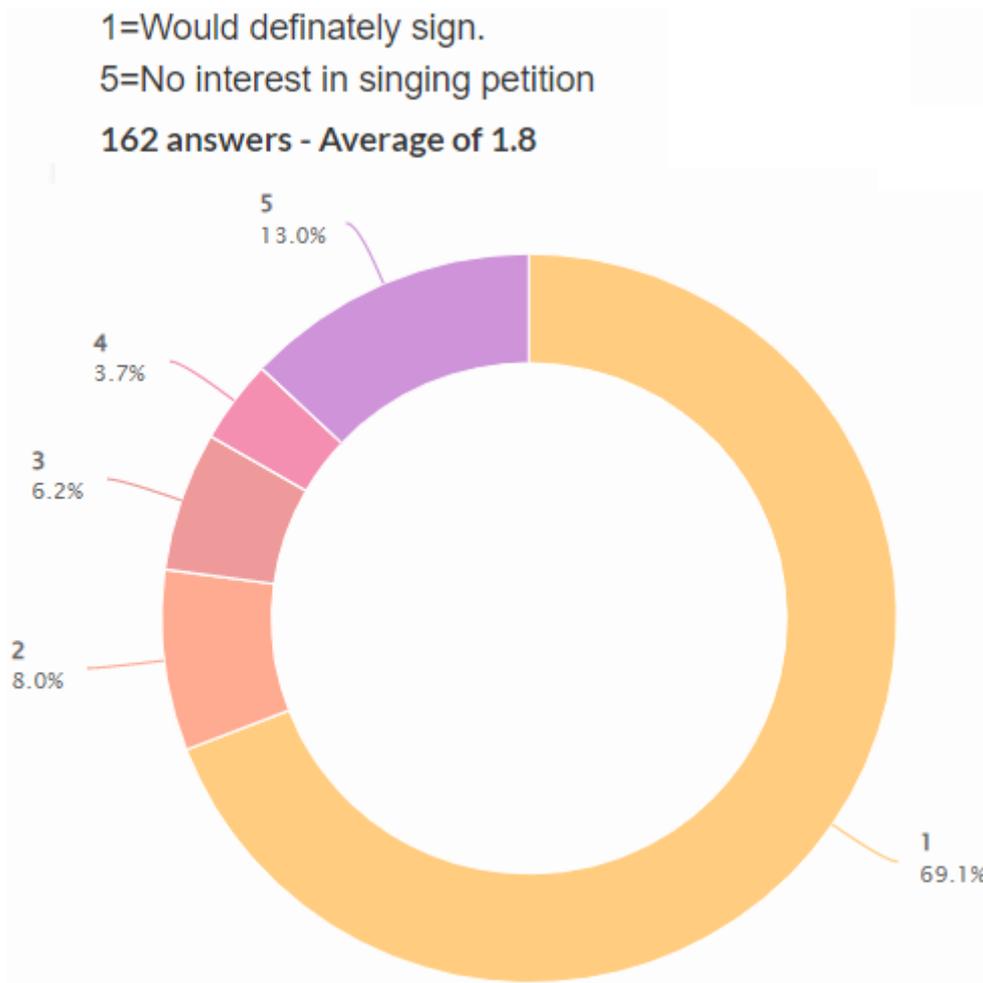
1	75 votes	46.3%
2	20 votes	12.3%
3	27 votes	16.7%
4	7 votes	4.3%
5	33 votes	20.4%



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May 30th 2022

Q10: If an online petition was setup in the future to push government to implement some of the provisions above, would you be willing to sign online?



1	112 votes	69.1%
2	13 votes	8.0%
3	10 votes	6.2%
4	6 votes	3.7%
5	21 votes	13.0%



EVBnb.ie response to Electric Vehicle Charging Infrastructure Strategy 2022-2025

May 30th 2022

Add any comment or question below.

Huge jump in price to change to EV,, even cheapest ones, some help needed from Gov.

Very little charge points in Clare and even Clare side of Limerick City, particularly DC chargers of any charge speed. Needs to be more charge points around Clare especially quick/fast DC chargers atleast 50kW. Mid/East Clare in particular.

So glad I bought an EV. Planning in trading our second car in ASAP for another EV.

Range anxiety is my concern even though I may not travel great distances all the time I would like a car and network backup to satisfy my needs

No option for County Dublin in the list above. Well done on getting this survey going.

more rapid chargers are require but at a reasonable rate

I recently bought a hybrid s as there are no chargers along the main routes, the few changes are in town centres which can be quite a diversion. I don't care about the price, I care about the time as I'm making a 400k trip and can't afford to have the trip take more time or more tiring driving into towns. Also safety is a factor, o think there should be motorways services stations with chargers, directly on all the main routes

More fast charging stations should be opened throughout the country and not chare excessive price for being faster. The government should be giving grants/tax relief to companies setting up fast charging stations to encourage more.

Many Many More Public Chargers Needed & In Safe Locations Assessable 24/7 . Also Repairs To Broken/Missused Chargers Needs To be URGENTLY Assessed.

Range and availability of new evs an issue

I actually need a tourer style van (7-9 seater) with a range of 450-500km. Am waiting for this to be realised and affordable, not the cost of a small mortgage. 😞 Also, will there ever be a grants support facility for a retrofit to existing vehicles? I could keep my own vehicle shell and simply upgrade, why is this not possible with grant support?



EVBnb.ie response to Electric Vehicle Charging Infrastructure Strategy 2022-2025

May 30th 2022

Additional spaces at fast charge points needed. Cables at fast charge points are too short and prevent cars charging due to poor charger site configuration/layout. Significant over representative chademo charging on dual chargers is a waste, particularly 100k+ chargers as they can't use the available higher speeds from these units.

There is no 2nd hand market at the lower end. Which would be affordable. Taking on debts to buy a car is not something we would do anyway.

My 1st ev arriving next week.

Need More 100kW charges with charging same as household rates.

Even if I had the money I would have to wait for up to 12 months now waiting for it to be manufactured and delivered

Every garage/car park/ hotel/school/ hospital should have a number of them.

More information is needed on where to charge. I can charge at home but have never used chargers on the street. It is a bit of an unknown territory. Some chargers you need a cable(which I don't have) costing €250. Others have a cable, but need a card. For an occasional user I may not use every month so don't want to pay a standing charge. I would rather just pay as I use a charger.

Hybrid and EVs are unaffordable for a large proportion on the population

Way too complicated a survey for normal drivers who own EVs, the era of nerds only owning EVs is gone

If you are in rental accommodation how does getting a home charger fitted work

They're just unaffordable for me full stop unfortunately.

Electric vehicles are totally out of monetary reach of the majority of i and the mining for the lithium for the batteries is causing more damage to the world.

Ev are a false and worse for the environment than ice cars. Impossible in country area and much too expensive and no 2nd hand value

Self charging Toyota add is the biggest lie out there.



EVBnb.ie response to Electric Vehicle Charging Infrastructure Strategy 2022-2025

May 30th 2022

I own an EV but I'm looking at 2nd hand options for a second family car so grants would be a great help for 2nd car

On a rapid charger 50 kW dc or 100 kW dc plus. There should be a charge after 45mins of at least 50 euros. People don't understand that a rapid charger is just a top up ie. 20 to 70% of the battery life not 100%. Also the 43kW on the side of most rapid chargers are only for Zoe's and why people buying ev's are not told or show all this information.

Q1 was the most relevant question to me. As I don't own an EV yet some questions I couldn't really answer properly



EVBnb.ie response to Electric Vehicle Charging Infrastructure Strategy 2022-2025

May 30th 2022

Appendix 2: Projected BEV sales to 2025.

Figures below only include Full Battery Electric Vehicles BEVs. Hybrids including Plug-in Hybrids PHEV are not included.

	Number of new BEV registrations	yearly increase	
2014	221		
2015	466	111%	
2016	392	-16%	
2017	622	59%	
2018	1,233	98%	
2019	3,444	179%	
2020	4,013	17%	
2021	8,646	115%	Average increase 2014 to 2021 = 80%
2022	15,563	80%	
2023	26,457	70%	
2024	42,331	60%	
2025	63,496	50%	
Total	166,884		



EVBnb.ie response to Electric Vehicle Charging Infrastructure Strategy 2022-2025

May 30th 2022

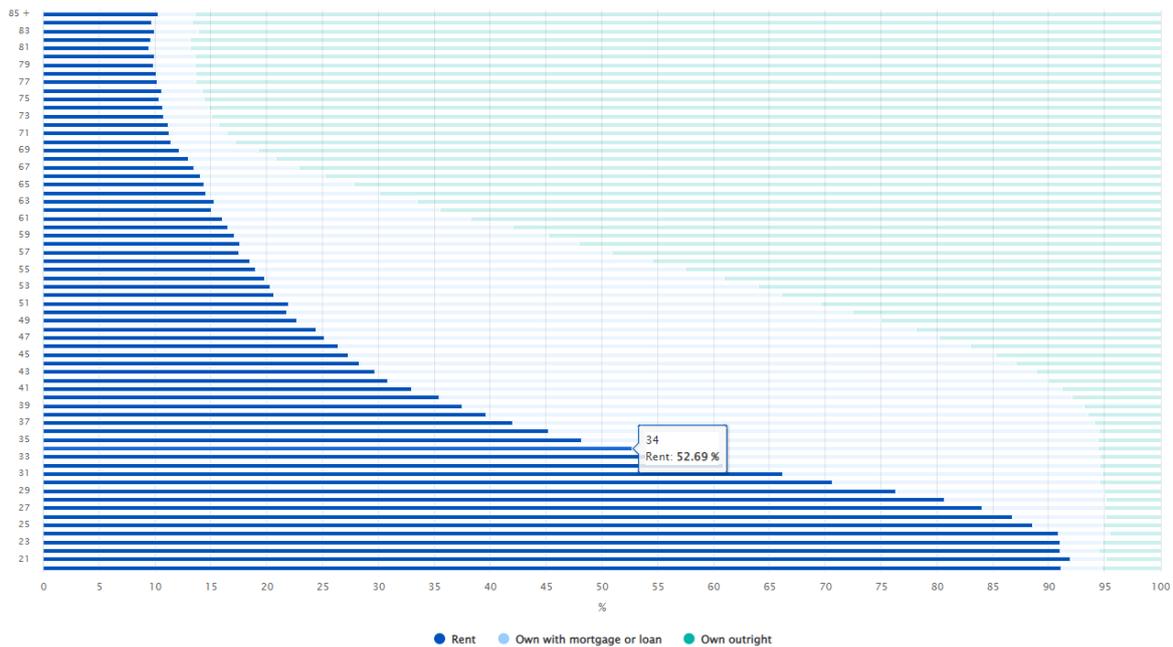
Appendix 3: CSO 2016 Tenure by age of householder.

Figures release in 2016 by Central Statistics Office CSO at <https://www.cso.ie/en/releasesandpublications/ep/p-cp1hii/cp1hii/tr/> and graph below show 52% of 34 year olds were living in rented accommodation.

In 2022 it is highly possible that 45%+ of that same cohort who are now 40 years old are still renting with much higher % in 20 to 40 age group.

Those figures would challenge the assumption in Department of Transport Strategy that 75% of drivers can install a home charger. Assumption also seems to be based on any apartment dweller having access to a home-charger but unlikely many apartment blocks will have charging facilities by 2025

Figure 3.5 Tenure status by age of householder, 2016



Source: CSO Ireland



EVBnb.ie response to Electric Vehicle Charging Infrastructure Strategy 2022-2025

May 30th 2022

Appendix 4: ChargeUp Europe Making the Case for Private Charging under the Energy Performance of Buildings Directive

<https://www.chargeupeurope.eu/positions/making-the-case-for-private-charging-under-the-epbd>

With regards to non-residential buildings:

- All existing non-residential buildings should be ready for EV charging by 2035, with intermediate targets for 2025 and 2030. ChargeUp Europe therefore recommends that all non-residential buildings with more than five parking spaces should have pre-cabling for one in two parking spaces by 2025, 70% of parking spaces by 2030 and 100% by 2035.
- Expand the scope of article 12, paragraph 1 to include targets for new non-residential and nonresidential buildings undergoing major renovation with more than three parking spaces. This also counts for new office- and office buildings undergoing major renovation.
- Ensure the installation of at least one recharging point for every five parking spaces by 2025 for all existing non-residential buildings with more than ten parking spaces.
- Non-residential buildings owned or occupied by public authorities should ensure pre-cabling for at least one in two parking spaces by 2027.

With regards to residential buildings:

- Introduce pre-cabling requirements for existing residential buildings. There is a huge gap in the EPBD proposal when it comes to providing sufficient charging solutions at residential private locations. ChargeUp Europe therefore argues that existing residential buildings with more than five parking spaces should have pre-cabling for one in two parking spaces by 2025, 70% of parking spaces by 2030, and make sure that they are 100% EV ready by 2035.
- Ensure the installation of at least one recharging point for new residential and residential buildings undergoing major renovation with more than three parking spaces, and pre-cabling for every parking space. 3) Ensure the installation of at least one recharging point for every five parking spaces by 2025 for all existing residential buildings with more than ten parking spaces.



EVBnb.ie response to Electric Vehicle Charging Infrastructure Strategy 2022-2025

May 30th 2022

Appendix 5: League table for CCS EV owners looking for a rapid chargers 150kW+

1st place		
Tesla		
Total Live rapid CCS = 44		
Location	No CCS Rapids	Link
Ballacolla M7	8	https://www.plugshare.com/location/116354
Birdhill M7	6	https://www.plugshare.com/location/135332
Castlebellingham South M1	8	https://www.plugshare.com/location/145978
Castlebellingham North M1	8	https://www.plugshare.com/location/145977
Mahon Point Cork	4	https://www.plugshare.com/location/326015
Tralee Ballygarry House	2	https://www.plugshare.com/location/341178
Johnstown House M4	6	https://www.plugshare.com/location/340761
Total Live	42	
Installed waiting on esb connection		
Athenry Raheen Woods M6	8	
Birdhill M7. 2 disconnected	2	
Total Live + about to be connected	52	
In Construction		
Sandyford	8	
Belfast	8	
2nd place		
Esb eCars		
Total Live rapid CCS = 28		
Total Live + about to be connected 28		
Location	No CCS Rapids	Link
Frankfield Cork	1	https://www.plugshare.com/location/34878



EVBnb.ie response to Electric Vehicle Charging Infrastructure Strategy 2022-2025

May 30th 2022

Rochestown Cork	1	https://www.plugshare.com/location/34962
Carnmore Galway	1	https://www.plugshare.com/location/91284
Tuam M17	2	https://www.plugshare.com/location/351289
Galway Plaza M6	1	https://www.plugshare.com/location/218903
Ballysimon Limerick	2	https://www.plugshare.com/location/85194
Blanchardstown Dublin	1	https://www.plugshare.com/location/67839
Kilmartins Athlone M6	1	https://www.plugshare.com/location/301071
Ballinalack M4	1	https://www.plugshare.com/location/356771
Carrick on Shannon	1	https://www.plugshare.com/location/34909
Mullingar M4	1	https://www.plugshare.com/location/334497
Kells, Meath	1	https://www.plugshare.com/location/268538
Kilcullen M7	1	https://www.plugshare.com/location/208448
Mayfield M7	7	https://www.plugshare.com/location/25050
Portlaois Plaza M7	1	https://www.plugshare.com/location/253326
Ballacolla M7	1	https://www.plugshare.com/location/116354
Fermoy (Amber)	2	https://www.plugshare.com/location/368330
Monaghan	2	https://www.plugshare.com/location/340761
Total Live	28	
Installed waiting on esb-networks connection		
3rd place		
lonity		
Total Live rapid CCS = 22		
Location	No CCS Rapids	Link
Athlone M6	4	https://www.plugshare.com/location/287759
Cashel M7	4	https://www.plugshare.com/location/287789
Gorey M11	4	https://www.plugshare.com/location/185518
Kill North M7	4	https://www.plugshare.com/location/214596
Kill South M7	4	https://www.plugshare.com/location/287674
City North M1	2	https://www.plugshare.com/location/287758
Total Live	22	