

## EQUALITY IMPACT ASSESSMENT

CCC549532948

**Directorate:** Place and Sustainability

**Service:** Transport & Infrastructure Policy & Funding

**Team:** Transport and Infrastructure Policy

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**Proposal being assessed:** On-street Electric Vehicle Infrastructure Policy

**Business plan proposal number:** n/a

### **Key service delivery objectives and outcomes :**

In May 2019, Cambridgeshire County Council declared a Climate and Environment Emergency, setting us on a pathway to securing a sustainable future for our County and its residents. It committed us to achieving net zero in Cambridgeshire by 2045, through decarbonising our communities and businesses. In response to this, a Climate and Environment Strategy was developed and adopted in 2022, which provides a framework for this change and puts climate change and biodiversity at the heart of the council's work.

In order to become a net zero area by 2045, one of the strategic priorities of the strategy is to enable and encourage the use of low-carbon transport, which includes electric vehicles (EVs). Government has announced the sale of new petrol and diesel cars and vans will be banned from 2035 in a bid to accelerate the transition to cleaner low emission vehicles. Whilst still forming a relatively small percentage of overall vehicles, absolute numbers of new EVs registered to addresses in Cambridgeshire have been growing exponentially in recent years and these figures are only going to get larger.

To support this, there will need to be a step change in the provision of electric vehicle chargepoints (EVCPs) across the network, particularly those available for public use. The number of EVCPs has not grown at the same rate as the uptake of

the vehicles themselves and this is seen as one of the barriers that could slow the transition to EVs. As of 2023, there are some 350 publicly available chargepoints in Cambridgeshire. This figure will need to rise considerably to stimulate and keep pace with demand.

### **What is the proposal:**

Government is keen to accelerate the delivery of electric vehicle charging infrastructure in order to provide confidence in the market and stimulate demand for the transition to EVs. Frustrated with the pace of roll-out, it has launched a number of funding mechanisms to help encourage the accelerated delivery of EVCPs. In particular, it has launched two funds designed to address the shortfall of charging infrastructure for residents without off-street parking fund. They are intended to support local authorities to work with the chargepoint industry to accelerate the roll-out and develop the commercialisation of EVCPs.

It is recognised that EVs have a role to play in meeting our net zero targets and that there will be considerable benefits brought to our cities and towns through improved air quality. Nonetheless, our area also has other transport challenges relating to congestion, health outcomes and connectivity that need to be balanced against facilitating the infrastructure needs of EVs, ensuring that they sit within the road user hierarchy adopted in the Local Transport Plan. We must also ensure that highway assets which we are responsible for aren't adversely compromised and that the maintenance burden to the local highway authority is not increased.

As a consequence, there is a plethora of new and emerging technologies on the market designed to address some of the challenges that a lack of off-street parking poses, which has an impact on us as local highway authority. It is therefore considered that a policy is required that formalises our current approach to responding to requests for EVCPs when they have an impact on the public highway.

It is not within the scope of the policy to set out exact geographic locations for EVCPs, as that remit lies elsewhere. Its purpose is to clarify what, at the current time Cambridgeshire County Council as the local highway authority considers acceptable in terms of the installation and use of EVCPs on the public highway.

### **What information did you use to assess who would be affected by this proposal?:**

There are two aspects of this policy that could impact people adversely if not properly considered.

The first is the general approach to the siting of EVCPs and the interaction with other policy areas, such as active travel policies. In considering this aspect, data was sought on car ownership and access to a vehicle, data around people who walk, wheel and cycle, studies and research carried out by campaign groups and groups representing people with protected characteristics. Data was also sought on the availability of off-street parking, to understand the extent to which residents may not have access to off-street parking and how this policy might impact

them. Consultation responses have been drawn on from a local pilot project to understand how such infrastructure can impact different road user groups.

The second aspect of the policy relates to the actual accessibility of an EVCP once a location is selected. There has been considerable work done nationally in this area recently, with research, studies and consultations undertaken with different user groups to inform the development of a national standard and design guidance for EVCPs. These have been drawn on to understand the needs of these differing groups and the solutions that can be put in place to mitigate.

**Are there any gaps in the information you used to assess who would be affected by this proposal?:** No

**Does the proposal cover:**

All staff countywide, All service users/customers/service provision countywide

**Which particular employee groups/service user groups will be affected by this proposal?:**

This policy is a general countywide highways policy that is intended to give guiding principles on broadly where EVCPs should and should not be located on the public highway. It can be argued that all user groups across the county will be affected by this policy as all service users use the public highway, whether this is on foot, bike, wheelchair, public or shared transport or private vehicle. Where EVCPs are located on the footway or other infrastructure intended for active travel, then negative impacts are more likely for these user groups. Where EVCPs are located in the carriageway, negative impacts are more likely for cyclists and vehicle drivers.

**Does the proposal relate to the equality objectives set by the Council's Single Equality Strategy?:** Yes

**Will people with particular protected characteristics or people experiencing socio-economic inequalities be over/under represented in affected groups:**

Mixture of over/under represented and in line with population, depending on the group

**Does the proposal relate to services that have been identified as being important to people with particular protected characteristics/who are experiencing socio-economic inequalities?:**

Yes

**Does the proposal relate to an area with known inequalities?:**

Don't know

**What is the significance of the impact on affected persons?:**

The first aspect in considering impacts and their significance is regarding the overall guiding principles as to where EVCPs should be located in the public highway. If EVCPs are located in the footway, or cables or other obstructions are placed across the footway to connect to a vehicle on the carriageway, then the greatest impact is likely to be on pedestrians or those who use wheeled modes such as wheelchairs, mobility scooters or who are encumbered with pushchairs. The impact of additional street furniture can be significant for groups with disabilities.

The Disabled Citizen's Inquiry, funded by the Motability Foundation and undertaken by Sustrans, researched the impact on environment for disabled people and found that: 41% of disabled people in the UK often experience problems reaching their destination due to the accessibility of the environment around them on a typical walking or wheeling journey, increasing to 55% for people with mobility impairments or learning disabilities; 58% of deaf or hard of hearing people and 64% for blind or visually impaired people.

The significance of issues for disabled people with street clutter and obstacles is further nuanced by the intersectionality of other protected characteristics, such as sex and ethnicity. The same research found that 45% of disabled women, compared to 35% of disabled men experience difficulty getting to their destination. This reflects wider enduring trends around the gendered division of unpaid labour and caring responsibilities still overwhelmingly lying with women. Whether or not they are disabled, women tend to be more encumbered by travelling with prams and pushchairs, small children or elderly people they are caring for.

Disabled women can feel the double impact of their gender and disability. Disability when it intersects with ethnicity also exacerbates the difficulties that white disabled people encounter in additional obstacles in the the environment. 53% of disabled people of colour often experience difficulties reaching their destination due to accessibility, compared to 32% of white disabled people. Furthermore, the Disabled Citizen's Inquiry also found that when disability intersects with socio-economic factors such as low income, then the cumulative impact can be seen, with a considerably higher proportion of disabled people in socio-economic groups D and E often experiencing negative impacts.

The second angle from which to consider the impact of the policy once a suitable location has been agreed for an EVCP installation, is the impact that the installation could have on identified groups. It is estimated that by 2035 when the ban on the sale of new diesel and petrol cars comes into effect, there will be around 2.7million drivers with disabilities who will need to be able to use EVCPs to charge their electric vehicles. Ensuring that where EVCPs are installed they are accessible to everyone needs careful consideration.

Charging infrastructure is developing rapidly and there are many examples where consideration of accessibility needs have not been undertaken. A piece of research was conducted by the Research Institute for Disabled Consumers in 2019 to understand the challenges that disabled people faced when trying to use EVCPs. The respondents to its survey overwhelmingly identified as having a mobility impairment (75%) and/or a dexterity/physical strength impairment (27%). 73% of respondents who had seen publicly available chargepoints perceived

them as neither accessible nor easy to use. They cited reasons such as insufficient width of parking bays to manoeuvre around, height and position of charging points, lack of EVCPs available and the time taken to charge.

This lack of accessible charging infrastructure is potentially a significant impact for disabled drivers. Many disabled drivers make use of the Motability scheme to lease accessible vehicles in exchange for their mobility allowance. The scheme is forging ahead with offering EVs as an option and their availability will only increase as the 2035 date for the ban on sales of new petrol and diesel cars approaches. The lack of accessible chargepoints will become a significant issue for these users if not addressed.

### **Category of the work being planned:**

Policy

**Is it foreseeable that people from any protected characteristic group(s) or people experiencing socio-economic inequalities will be impacted by the implementation of this proposal (including during the change management process)?:**

Yes

**Please select:** Age, Disability, Sex, Socio-economic inequalities

### **Research, data and /or statistical evidence:**

*Research relating to age:*

Public Health England: [Working together to promote active travel \(2016\)](#)

Sustrans: [The Greater Cambridge Walking and Cycling Index \(2021\)](#)

Possible: [Streetspace Invaders: mitigating the growing risk that EV charging poses to scarce pedestrian space \(2023\)](#)

*Research relating to disability:*

DfT: [Walking and cycling statistics factsheet \(2021\)](#)

Research Institute for Disabled Consumers: [Going electric? Research report into the accessibility of electric vehicles \(2021\)](#)

Motability: [The Transport Accessibility Gap \(2022\)](#)

Sustrans: [The Disabled Citizen's Inquiry \(2022\)](#)

Sustrans: [The Greater Cambridge Walking and Cycling Index \(2021\)](#)

Possible: [Streetspace Invaders: mitigating the growing risk that EV charging poses to scarce pedestrian space \(2023\)](#)

*Research relating to sex:*

DfT: [Walking and cycling statistics factsheet \(2021\)](#)

Sustrans: [The Disabled Citizen's Inquiry \(2022\)](#)

Women's Budget Group: [Towards gender inclusive and sustainable transport systems \(2021\)](#)

International Transport Forum: [Transport Innovation for Sustainable Transport - a gender perspective \(2021\)](#)

Sustrans: [The Greater Cambridge Walking and Cycling Index \(2021\)](#)

Invisible Women by Caroline Criado-Perez Invisible Women | Caroline Criado Perez

Possible: [Streetspace Invaders: mitigating the growing risk that EV charging poses to scarce pedestrian space \(2023\)](#)

*Research relating to socio-economic status:*

DfT: [Walking and cycling statistics factsheet \(2021\)](#)

Sustrans: [The Disabled Citizen's Inquiry \(2022\)](#)

The Health Foundation: [Trends in households without access to a car \(2021\)](#)

Sustrans: [The Greater Cambridge Walking and Cycling Index \(2021\)](#)

Possible: [Streetspace Invaders: mitigating the growing risk that EV charging poses to scarce pedestrian space \(2023\)](#)

### **Consultation evidence:**

Research Institute for Disabled Consumers: [Going electric? Research report into the accessibility of electric vehicles \(2021\)](#) Appendix C sets out questions used in survey to inform research.

Designability: [Design guidance accessible EV charging \(2022\) Engaged with 200 Motability scheme members](#)

Sustrans: [The Disabled Citizen's Inquiry \(2022\)](#) The appendix of this report sets out the methodology used, details questions asked at workshops and criteria for people invited to participate in workshops.

Sustrans: [The Greater Cambridge Walking and Cycling Index \(2021\)](#) Includes the questions and results of an attitudinal survey conducted June-August 2021

Cambridgeshire County Council: [Statutory consultation on proposed Traffic Regulation Orders \(TROs\) for installation of EVCPs on DeFreville Avenue and Riverside in Cambridge. \(2022\)](#) Includes responses to statutory consultation held on trial installation of EVCPs on two streets in Cambridge.

**Based on all the evidence you have reviewed/gathered, what positive impacts are anticipated from this proposal?:**

The development of this policy seeks to strike a balance between encouraging the transition to low carbon vehicles with other competing demands on the public highway and ensuring that vehicles - regardless of their zero emissions credentials - do not undermine other policy areas such as reducing congestion and encouraging active travel. By proactively setting out the county council's position in terms of a set of guiding principles on the acceptability of EVCPs in the public highway, any potential EV chargepoint operator is clear what our baseline requirements are.

In doing this, the positive impacts that can be anticipated from this policy can be summarised as:

- Space and usability of footways being preserved for pedestrians, wheelchair users and pushchairs:

The evidence cited elsewhere in this EqlA consistently cites the encroachment of vehicles and associated infrastructure, along with other street clutter on footways as a reason that getting around can be particularly difficult for certain groups. Through clarifying our position particularly on the use of crossover cables on footways, this sends a strong message that the needs of pedestrians, wheelchair users and others that are encumbered by pushchairs, baggage, small children, or others in their car should be put ahead of the needs of infrastructure for vehicles.

Not only does this mean that additional hazards such as cables are not introduced across the footway, it also means that the width of what are often already narrow footways are not further reduced through the introduction of EVCPs within the footway.

By setting this out, it will ensure that the needs of disabled groups, elderly people, and those with the majority of caring responsibilities - typically females - are not eroded through inappropriate placement EVCPs and further degradation of the environment to occur.

Through setting out the requirement to consider the accessibility of each scheme within the framework of the PAS1899:2022 best practice, in addition to an EqlA considering more nuanced impacts of specific schemes it is anticipated that a more positive transition to EVs will be achieved locally for all users.

**Based on consultation evidence or similar, what negative impacts are anticipated from this proposal?:**

The increase in number of EVCPs that are anticipated to be needed to support the transition to EVs has the potential to encroach upon infrastructure intended for and used by non-vehicular users if not carefully managed. Evidence and research detailed earlier in this EqIA repeatedly demonstrates the issues groups with some protected characteristics encounter when excessive street clutter is present on footways.

Without a policy setting out the county council's position, then the following negative impacts could be anticipated as the number of EVCPs on our public highway increases:

- Additional trip hazards being introduced on footways:

Without a strong position on the trailing of cables or similar across footways, then there is an increased risk of introducing additional hazards onto the footway which statistics show would adversely affect disabled groups, older groups and female groups.

- Narrowing of footway through increased street clutter:

Without a strong policy position on the presumption against siting EVCPs in the footway except in exceptional circumstances, the forecast increase in EVCPs required to meet demand could result in the narrowing of footways and an increase in the amount of obstacles in the footway in the form of street clutter. A narrowing of the footway is likely to result in circumstances arising where two wheelchairs or pushchairs are unable to safely pass each other, even where the footway is currently wide enough to do so which often isn't the case. Again, this impact is likely to disproportionately affect disabled groups, females (who are statistically more likely to be undertaking caring responsibilities) and older groups.

- Inaccessible EVCPs:

Without a strong policy position on our requirements and standards around the accessibility of EVCPs themselves, then research shows that there could be negative impacts around lack of signage and information; the built environment - including space around the vehicle - and the chargepoint itself in terms of being able to see reach and use parts of the unit. Again, the most impacted groups are likely to be disabled groups, older groups and those with caring responsibilities who are often encumbered, statistically likely to be female.

### **How will the process of change be managed?:**

The development of this policy is seen as a baseline of guiding principles from which detailed proposals for individual schemes can be developed. As this is intended to be a high-level policy applicable on a county-wide basis, research and consultation findings have been drawn on the whole from nationally-commissioned studies. These have been used to develop best practice, to which we should work towards.

As individual schemes come forward, it will be necessary for the individual project to undertake a more detailed EqIA that considers more nuanced impacts that may arise as a result of specific geographical locations. It will be expected that appropriate consultation and engagement will be undertaken with groups identified in this overarching EqIA to ensure that impacts are fully identified and appropriate steps taken to mitigate against any that are negative.

**How will the impacts during the change process be monitored and improvements made (where required)?:**

The development of this policy is seen as a baseline of guiding principles from which detailed proposals for individual schemes can be developed. As this is intended to be a high-level policy applicable on a county-wide basis, research and consultation findings have been drawn largely from well-conducted nationally-commissioned studies. These have been used to develop best practice, to which we should work towards.

As individual schemes come forward, it will be necessary for the individual project to undertake a more detailed EqIA that considers more nuanced impacts that may arise as a result of specific geographical locations. It will be expected that appropriate consultation and engagement will be undertaken with groups identified in this overarching EqIA to ensure that impacts are fully identified and appropriate steps taken to mitigate against any that are negative.

It is acknowledged that this is a new and emerging area for local highway authorities to deal with, with competing demands on the public highway that we are responsible for. Roll-out of EVCPs is starting to proceed at pace, with central guidance lagging behind in some respects.

This policy is intended to set out our guiding principles at the current time, acknowledging that as new technologies come forward and their suitability more robustly assessed and evaluated, the policy will need reviewing and potentially amending. Furthermore, as specific schemes are delivered, a monitoring and evaluation framework that considers the impacts identified will be developed so that lessons can be learnt and future schemes improved.

**Equality Impact Assessment Action Plan:**

<b>Details of negative impact (e.g. worse treatment/outcomes)</b>	<b>Groups affected</b>	<b>Severity of impact</b>	<b>Action to mitigate impact with reasons/evidence to support this or justification for retaining negative impact</b>	<b>Who by</b>	<b>When by</b>
If EVCPs are located in the footway, or cables or other obstructions are	Age, Disability, Sex, Socio-	Medium	In developing the policy, an overarching principle will be	Sarah Hatcher	05/12/2023

Details of negative impact (e.g. worse treatment/outcomes)	Groups affected	Severity of impact	Action to mitigate impact with reasons/evidence to support this or justification for retaining negative impact	Who by	When by
<p>placed across the footway to connect to a vehicle on the carriageway, then the greatest impact is likely to be on pedestrians or those who use wheeled modes such as wheelchairs, mobility scooters or who travel with pushchairs. The significance of added street furniture can be significant for groups with disabilities.</p>	<p>economic inequalities</p>		<p>included that states that as a general approach, EV infrastructure should not be located in the footway. Such placement creates additional street clutter which undermines efforts to increase walking, cycling, and wheeling and narrows the useable width of the footway. Only in exceptional circumstances, where it can be demonstrated that more than 2m of useable footway can be maintained, or new and innovative technologies can be shown to not restrict access will this be considered.</p>		
<p>EVCPs not being accessible for people with disabilities, older age groups who can find digital technology a barrier, women who often are encumbered by small children or other caring responsibilities.</p>	<p>Age, Disability, Sex</p>	<p>High</p>	<p>In developing the policy, a statement will be included that requires any EVCP installation to have due regard to the best practice set out in PAS1899:2022. A requirement will also be included that for any</p>	<p>Sarah Hatcher</p>	<p>05/12/2023</p>

Details of negative impact (e.g. worse treatment/outcomes)	Groups affected	Severity of impact	Action to mitigate impact with reasons/evidence to support this or justification for retaining negative impact	Who by	When by
			<p>installation, an EqIA must be completed using Cambridgeshire County Council templates, that gives due regard to the following considerations: signage and information; the built environment including space around the vehicle; charging of the vehicle.</p>		

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**Confirmation:** I confirm that this HoS is correct

**Status:** Approved