

Equality Impact Assessment

Project ID (Project Initiation Document - if applicable):	Draft Electric Vehicle (EV) Charging Strategy – Project ID n/a
Which Pillars does this work respond to? Pillar A Reducing Place Based Inequality, Pillar B - Reducing Inequalities for Equality Groups, Pillar C - Promoting Equality as an Employer (See section 5 below)	A and B
Directorate:	Environment Culture and Customer Services
Version:	1
Date:	20/07/2022
Updated by:	Kieran Taylor (Project Centre Lead EV Consultant)

<p>Please provide a brief description of the proposal/Policy or project including its aim and expected outcomes:</p>	<p>Description: The EV Charging Strategy is subordinate to the Borough’s Transport Strategy (LIP) and focuses on how the borough will deliver 2,000 additional EV charge points by 2026 in accordance with existing policy, alongside other measures to facilitate the transition to EVs.</p>
<p>Who is the policy/ proposal going to affect (the protected groups below) and in what way? (Include positive and negative impact) Please use evidence to support your analysis.</p>	<p>Description: The decision will chiefly impact drivers across all protected groups who live, work, study or visit the borough. It will facilitate the transition to EVs by making it easier for drivers to find an electric vehicle charging point, particularly those without access to off-street parking. At first this may make it harder for those without an EV to find a parking space, but as more people switch to EV this becomes less of an issue, and a phased implementation plan and careful monitoring will help to mitigate this.</p> <p>Greater uptake of EVs will have a positive impact on air quality. Poor air quality has a greater impact on some groups with protected characteristics; children, pregnant women and older people suffer the negative health impacts of poor air quality more than others.</p> <p>The charge points may also impact pedestrians where they are placed on the footway, but there will be mitigation measures around this to help minimise the impact.</p>

Instructions	Descriptor	Score	Potential Impact on Equality groups/individual(s)	The potential for complaint/litigation	Impact Scoring consideration
Use the scoring matrix shown in the key. Then outline your rationale for that score in the comments section.	Very High	4	Severe impact causing disadvantage to all or some equality groups or individuals - leading to a breach in equality legislation	Litigation certain	Must undertake full EIA -and work with Equalities team
	High	3	Substantive impact on all or some equality groups or individuals - leading to a breach in equality legislation	Expect Litigation/ Resident Petitions etc	Savings proposal / Service closure/changes to eligibility criteria/charging polices, disruption to services. Must undertake full EIA -and work with Equality
	Moderate/Medium	2	Impact on some equality groups or individuals likely	Litigation possible but not certain. High potential for complaint.	Moderate Impact – seek advice from equality team
	Low	1	Some remote impact for some groups or individuals - mitigation needs to be included in main cabinet report	Complaint and Litigation unlikely	If there is some minimal risk to organisation, undertake Initial Equality Impact Assessment
	Negligible impact	0	No impact or adverse outcome for any equality group or individuals	Unlikely to cause complaints / litigation	If there is no risk at all to organisation, identify legal duty in main report and use standard equality text to show that you have considered the Equality Act 2010 and concluded neither positive nor negative impact

Relevance Test/Screening Assessment whether an initial EIA is required:

Protected Characteristic	Score	Issues & rationale for scoring	Describe positive impact (no scoring required). Add to Equality paragraph under your Cabinet report.
Age	2	<p>There are concerns that the decision could impact those with disabilities including those with age or pregnancy related health issues. This would apply if charge points, intended to serve residential areas, are not within close proximity and are not fully accessible. There is also a potential trip hazard risk around trailing cables. However, many of these risks are mitigated as follows:</p> <p>The strategy commits to handling requests for charge points from Blue Badge holders differently from general requests so that they are prioritised for a nearby charge point.</p>	Improved local air quality (poor air quality can disproportionately impact children and older people).
Disability	2	<p>National guidance, which will define what constitutes a fully accessible charge point, is scheduled to be released in the summer of 2022. The final version of the EV Charging Strategy can then include detail on how concerns on disabled accessibility will be addressed.</p>	Improved local air quality
Pregnancy and Maternity	1	<p>All charge points will be located at the kerbside to minimise the risk of trailing cables. As part of the accessibility standards, it is expected that charge point operators will be required to ensure that the cables are visible.</p> <p>There is also a concern that some groups with protected characteristics have a higher proportion of people on lower incomes, which makes electric vehicle ownership/leasing more challenging. For example, disabled people in London are more likely to live in households with less than £20,000 annual income: 61 per cent of</p>	Improved local air quality (poor air quality can disproportionately impact pregnant women and children).

		<p>disabled Londoners live in such households compared to 25 per cent of non-disabled Londoners.¹</p> <p>This is expected to be a short-term impact with EVs expected to achieve price parity with petrol/diesel vehicles by 2025-27, with more second-hand options becoming available. This also needs to be set in the context of the rising cost of petrol/diesel, particularly for high mileage users. The densities and phased approach to installation (so that supply of charge points is in alignment with demand), should mean that those without EVs are not significantly impacted in terms of their ability to find parking spaces.</p>	
Sex	1	There is a general concern that groups which are more worried about their personal safety when walking, could find accessing EV charge points more difficult.	Improved local air quality
Gender reassignment	1	However, the density of charge points and ease of use outlined in the EV Charging Strategy has been designed to mitigate these concerns.	Improved local air quality
Religion/belief	1	The introduction of permit/parking charges (outside EV bays) for EVs will add an additional cost for EV owners which individuals will need to consider. However this will still be less expensive than petrol/diesel vehicles. The proposed payment structure will be considered separately as part of the Council's emerging Parking Strategy, which will have a separate EQIA considering this issue.	Improved local air quality
Sexual orientation	1		Improved local air quality
Race (including Travellers, refugees, White working-class residents etc)	2		Improved local air quality
Total Score	11		
How your proposal/project/policy gives due regard to other equality and human rights duties	No negative impact on community cohesion or human rights have been identified.		
Fostering good relations & community cohesion			

¹ [London-wide ULEZ and MTS Revision Baseline Report for ULEZ Scheme IIA and MTS IIA](#)

Human Rights (see overview for Human Rights articles)	
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"If your relevance test (above) to decide whether the equality duty is engaged scores less than 10 points and you have no individual scores of greater than 1 (for each characteristic), then your relevance test ends here. You must make sure that your Cabinet report/single Member report/policy/project sets out that you have given regard to the equality duty under the equality section. (see link: [Standard Equality text for your report.docx](#)) Please review and update this regularly throughout the life cycle of your work, if you have any changes that affect the impact on the protected groups - e.g after the consultation.

You do not need to carry out an initial EqIA if there is only a positive impact. Please highlight this in your report, project and/or proposal. Please note that a significant impact can also refer to impact on individuals, as well as an equality group.

If you have any individual scores greater than 1, or if your overall score is over 10 then you will need to complete the initial EqIA (below) immediately. "

Initial Equality Impact Assessment

2. Based on your response to Question 1, please think about who will be impacted. Please specify the equality groups and the organisations you are consulting (if not consulting, please indicate).	There are several groups representing people with disabilities which will be contacted during the consultation to seek their views. This will include, but not be limited to: <ul style="list-style-type: none">- Hounslow Disability Community Forum- Motability- Speak Out Hounslow- Disability Network Hounslow
3. If you are consulting, please state when and for how long is your consultation period? You will need to provide alternative formats for your consultation (Easy read, braille, large print, audio, BSL etc), please factor this into your consultation period and describe the formats you have selected. Please note, alternative formats will take longer to transcribe, and all groups should have the same time to respond.	The consultation will run for just under 8 weeks from July – September 2022. Hard copies of the material are available at locations across the borough and it is being promoted with posters and flyers to raise awareness of it. Material can be provided in different formats upon request.

<p>4. As part of this assessment, research or evidence you have undertaken, please state what additional changes have been made to the project/policy/plan/proposal/decision.</p>	<p>The accessibility of charge points for those with disabilities and the potential for charging cables to create trip hazards on the footway are known issues. The strategy already took account of these prior to the EqIA being completed. No additional issues prompting changes were uncovered in researching the EqIA.</p>
<p>If consultation was undertaken and is completed - Please describe what your consultation feedback was and any emerging equalities issues. Please submit an appendix with your consultation feedback and responses.</p>	<p>Consultation is taking place at present (20 July – 11 Sept 2022).</p>
<p>5. Based on the consultation responses, please explain what actions you plan to take to minimise (or mitigate) any disadvantages raised. Please describe how you are giving due regard to the 'EDI Objectives' in the section below.</p>	<p>We will be evaluating the feedback provided in response to the consultation survey and stakeholder engagement sessions, and considering if any changes are needed to the strategy and this EQIA as a result.</p>

Set out how your Strategy/Policy/Project/Programme will contribute to the Equality Objectives below:

Equality Objective - Reducing Place Based Inequality:

- Levelling Up - (eg includes initiatives to create wealth, promote social mobility upskilling)
- Social Capital (eg include Right to Sensory Equality/BAME Consortium/Disability and Age partnership and Health Inequality sub group)
- Place and Prosperity (eg Corporate Community Asset Plans/Regeneration/town Centre Revitalisation, Digital Connectivity)

Equality Objective - Reducing Inequalities for Equality Groups:

- Promote Employment
- Tackle Poor Educational Outcomes
- Tackle disproportionate representation in the Criminal Justice System
- Promote Safety, Health and Well Being of our Residents including Children and Young People,
- Promote Digital Literacy
- Promote Engagement, including with seldom heard groups
- Promote Evidence Based Approach by improving data on inequality

Equality Objective - Promoting Equality as an Employer:

- Promoting Leadership and Organisational Commitment to EDI
- Promoting Diverse and Engaged Workforce

The EV Charging Strategy can contribute to the Place and Prosperity objective and the consultation is geared to engaging disability groups. The strategy seeks to co-locate EV chargepoints in town centre destinations, strengthening them as places to visit.

Appendix 1 – The Impact on Protected Groups

Background

The draft Electric Vehicle (EV) Charging Strategy is being consulted on from July 2022. It sets out how the London Borough of Hounslow will provide charge points to facilitate the switch to EVs, in a manner that is in line with existing transport policy, such as the borough's Local Implementation Plan.

The objectives of the draft EV Charging Strategy are to:

1. **Focus our electric vehicle infrastructure delivery to realise the greatest reduction in harmful emissions**
2. **Achieve a good minimum level of service for all residents, businesses and visitors**
3. **Deliver a charge point network which is good value for money**
4. **Provide electric vehicle infrastructure in a fair and transparent way**
5. **Provide electric vehicle infrastructure which supports more efficient use of our streets;**

All residents, workers and visitors will benefit from better air quality and reduced carbon emissions which the EV Charging Strategy aims to achieve. Children, older people and pregnant women are more sensitive to the effects of air pollution than the general population. Children are more susceptible because their lungs are still growing. Older people are more vulnerable as they are more likely to already have medical issues which are exacerbated by poor air quality². Pregnant women are a vulnerable group because of potential harmful impacts on the unborn foetus and evidence regarding adverse birth outcomes³.

The strategy will also seek to implement an even distribution of charge points across the borough. The current approach of fulfilling demand has led to a greater concentration of charge points in the wealthier areas of the borough. Over the term of the strategy EVs will become more mainstream and the approach in the strategy is to keep the overall numbers in line with forecast demand, but to have a more placed based approach to installations that reflect levels of private off-street parking provision (ie density of provision will be higher in areas with little off-street parking).

² [Every breath we take: The lifelong impact of air pollution 2016 \(Royal College of Physicians\)](#)

³ Shang, L., Huang, L., Yang, L. et al. [Impact of air pollution exposure during various periods of pregnancy on term birth weight: a large sample, retrospective population-based cohort study](#). Environ Sci Pollut Res 28, 3296–3306 (2021). <https://doi.org/10.1007/s11356-020-10705-3>

However, the focus of this EqlA is to assess any negative impacts that those with protected characteristics may experience stemming from measures outlined within the EV Charging Strategy. This EqlA draws on research conducted by TfL⁴ to understand the travel needs of different communities. The research identifies seven groups of Londoners who experience barriers when accessing transport. Six of these groups correspond with a group which have protected characteristics. For example younger and older Londoners have both been defined as groups which face barriers to transport and have the protected characteristic of age. The groups identified by TfL have been used in the assessments summarised below.

Personal Safety

Each protected characteristic is assessed in turn below but the issue of personal safety, which may impact several groups, is discussed immediately below. Personal safety is relevant because it is likely that residents using on-street chargers will park their EV and leave it to charge overnight. They will then have to walk back home from their vehicle. This is because instead of visiting a dedicated refueling station a lot of refueling will take place over several hours when the EV is parked. Hounslow Council has a large role in facilitating home charging for households without access to off-street parking and the way in which these charge points will be provided has been a focus of the EqlA.

In areas where most households lack access to off-street parking the EV Charging Strategy has a target to ensure that households will be within a 1-minute walk of their nearest charge point. In other areas the target is for households to be within a 5-minute walk of their nearest charge point. TfL's research on understanding diverse communities identifies that in 2017/18, on average 30 per cent of Londoners reported feeling very or quite worried about their personal security when using public transport which is including walking as a mode. Several groups with protected characteristics reported greater concern about their personal safety than the general population;

- disabled Londoners (37 per cent),
- young Londoners aged 16 to 24 years old (35 per cent),
- women (34 per cent) and
- black and minority ethnic Londoners (33 per cent)

Within the EqlA for Hounslow's Local Implementation Plan (LIP) this is already recognised as it notes 'This fear (for personal safety) can act as a barrier to using the transport network to access key facilities and employment opportunities. Some of these issues may be alleviated, for instance, by ensuring better lighting, improved sightlines (the removal of blind spots), better signage, the installation of CCTV, increased staffing and a visible police presence. Similar issues can relate to people walking generally through public spaces, particularly at night.' The LIP EqlA concluded that while personal safety and security remains a major concern it was not considered that people with protected characteristics were disproportionately impacted by the projects and programmes proposed by the LIP. These issues would be addressed by implementing the design principles of the Healthy Streets approach, which includes feeling safe.

⁴ [Travel in London: Understanding our diverse communities 2019 \(tfl.gov.uk\)](https://www.tfl.gov.uk/research-and-data-analysis/research/understanding-our-diverse-communities-2019)

How will the EV Charging Strategy address these issues?

- In part the strategy minimises personal safety fears for all groups by committing to installing charge points that facilitate home-charging in a dense network; with walking distances of between one-minute and five minutes.
- When procuring charge points the council will consider ease of payment methods so that time spent making payment is minimized.
- The strategy proposes supporting provision of both destination and rapid chargers, which will provide alternatives to home charging for those without access to off-street parking at their home
- When deciding on the placement of charge points personal safety will be a consideration. Locations will be assessed to take into account; lighting, whether there are nearby amenities and human activity, that can provide passive surveillance.

Trip Hazards

Charging an EV requires a cable to connect the EV to the EVI. This introduces an additional trip hazard into the public realm which is likely to impact the elderly, those with disabilities and pregnant women.

How will the EV Charging Strategy address these issues?

- **The strategy has mitigated this as far as is possible by; not permitting residents to lay a cable across the footway, installing charge points at the front of the footway and utilising existing lamp-columns in residential areas.**

(i) Age

TfL's research identifies that older Londoners, those aged 65 and over, and younger Londoners, those 24 and under, have particular barriers to accessing transport. These groups are considered under the age characteristic.

Older People (65+)

A person's ability to use the transport network can be reduced as a result of age-related health conditions that affect mobility. The elderly may have reduced walking ranges. Age-related health conditions will be considered under the Disability section. The good design and maintenance

of roads and footways can improve walking conditions for elderly people. In this instance it will be well-planned placement of street furniture in the public realm.

How will the EV Charging Strategy address these issues?

- The strategy has committed to maintaining minimum footway widths as set out by national government guidance and adhered to Healthy Streets principles by choosing to install charge points on residential streets within lamp-columns. This means that additional street furniture is not required and footways are kept clear.
- The council also does not allow people to trial cables across the footway as it may introduce additional trip hazards.

Younger People (24-)

Transport choice for younger people is often constrained by cost and parental perceptions of safety, both in terms of the risk of being involved in an accident, and in terms of personal safety when travelling unsupervised. Personal safety concerns have been dealt with above and it was not considered that younger people would be disproportionately impacted by anything proposed in the EV Charging Strategy.

How will the EV Charging Strategy address these issues?

- No issues were identified to address.

(ii) Disability

About 21% of people living in the UK report having a disability. Disabled people are more likely to be in a household without access to a car and in households with access to a car they are less likely to be a driver. That said, disabled people who do drive, rely heavily on their cars. TfL conducted research into blue badge holders' perceptions of EVs in 2016⁵ which found that while being open to switching to EVs there were many unknowns that needed to be answered first. The most recent research into barriers faced by disabled people trying to access EV charge points has been commissioned by Motability. Their research showed that issues faced by disabled drivers included:

⁵ [Electric Vehicles: Gauging interest among disabled and elderly drivers. TfL](#)

- the weight of charging cables,
- the force required to attach the connector,
- the lack of dropped kerbs around charge points and
- unsuitable parking arrangements.

Detailed discussion of these issues is available in published reports⁶ which have been reviewed by the Traffic, Transport & Parking team. While the provision of EV charging infrastructure should not materially disbenefit disabled people the realization of this will depend on the detail of how charge points are provided. Of the issues identified above it is the provision of dropped kerbs and providing suitable parking arrangements which the Council can directly address at on-street and off-street locations where is responsible for installing charge points. Having charge points which do not exclude disabled people because of their design is something which can be addressed through procurement specifications.

The DfT is currently developing accessibility standards for charge points which will provide clear definitions of what constitutes non accessible, partially accessible and fully accessible public EV charge points. This is scheduled to be published in the summer of 2022. This draft EV Charging Strategy has been prepared without sight of this developing guidance and it has been difficult to make firm commitments on what mitigating measures will be implemented without knowing what the appropriate standards are. It is intended that the final iteration will incorporate clear commitments on delivering accessible EVI in line with best practice.

One important issue, where there isn't clear guidance, is the ratio or number of charge points which should be provided with oversized parking bays. These provide additional space around vehicles to facilitate easy maneuvering for those with limited mobility or in a wheelchair. The dimensions of these parking bays are set out in existing guidance⁷ on the design of accessible car parking. This same design guidance advises that designated accessible spaces should be located adjacent, or as close as possible, to the entrance to the facility they serve, and no more than 50 meters away. It is this which has guided our proposal to treat requests for EV charge points from blue badge holders without access to off-street as a priority request and look to install charge points within 50m of their property.

How will the EV Charging Strategy address these issues?

- The draft strategy already gives Blue Badge holders priority when handling requests for charge points from the general public
- The final strategy will also incorporate best practice guidance from national guidance due to be published in the summer of 2022.

⁶ [User Engagement Report: Accessible EV Charging](#), Motability the Charity.

⁷ [Inclusive Mobility: a guide to best practice on Access to Pedestrian and Transport Infrastructure](#)

(iii) Gender Reassignment

In general, it was not considered that persons that had undergone or were undergoing gender reassignment would be disproportionately impacted by anything proposed in the EV Charging Strategy.

How will the EV Charging Strategy address these issues?

- No issues were identified to address.

(iv) Race

As referenced in the Integrated Impact Assessment for the expansion of the Ultra-Low Emission Zone⁸ there is a disproportionate number of PHV drivers who are from BAME groups. In February 2017, 73% of PHV drivers were BAME, compared to 40% of the population of Greater London. Hounslow has a high number of PHV drivers and, as high mileage motorists, the EV Charging Strategy affords them priority in the provision of EV charge points.

In general, it was not considered that people from different racial backgrounds would be disproportionately impacted by any of the proposed measures within the draft EV Charging Strategy.

How will the EV Charging Strategy address these issues?

- No issues were identified to address

(v) Religion or Belief

In general, it was not considered that people from different faiths were disproportionately impacted by the measures proposed in the draft EV Charging Strategy. However, as noted by the EQIA for the borough's LIP, people in religious dress may be concerned about the possibility of racist attacks and personal safety on the transport network, including when walking through the public realm. These concerns are addressed above.

⁸ [Ultra Low Emission Zone - Further Proposals - Integrated Impact Assessment](#). Transport for London

How will the EV Charging Strategy address these issues?

- No issues were identified to address

(vi) Sex

In general, it was not considered that people of different sexes were disproportionately impacted by the EV Charging Strategy. Personal safety concerns are addressed above.

How will the EV Charging Strategy address these issues?

- No issues were identified to address

(vii) Sexual Orientation

In general, it was not considered that people with different sexual orientations were disproportionately impacted by the EV Charging Strategy. LGB Londoners are significantly more likely than heterosexual Londoners to have experienced incidents of unwanted sexual behaviour or hate crime

How will the EV Charging Strategy address these issues?

- No issues were identified to address

(viii) Pregnancy or Maternity

In general, it was not considered that pregnant women and parents with children were disproportionately impacted by the EV Charging Strategy.

How will the EV Charging Strategy address these issues?

- No issues were identified to address

(ix) Fostering Good Relations and Community Cohesion

The EV Charging Strategy has the objective of providing EV charge points in a fair and transparent way. Groups given priority are those which will have greater need for charge points either because they are high mileage motorists or inability to walk long distances. This prioritization is grounded in Equalities duties and a desire to ensure that the borough's investment is targeted where the greatest emissions reductions can be made. Publishing a clear rationale for how different user groups are treated should contribute to fostering good relations.

How will the EV Charging Strategy address these issues?

- No issues were identified to address

(x) Human Rights

No impact on Human Rights has been identified.