

Appendix C

Equality Impact Assessment (EIA) Form

(Before completing this form, please refer to the supporting guidance document)

The purpose of this form is to aid the Council in meeting the requirements of the Public Sector Equality Duty contained in the Equality Act 2010. This requires the Council to have “due regard” of the impact of its actions on the need to eliminate unlawful discrimination, advance equality of opportunity and foster good relations between persons who share a relevant protected characteristic and those who do not.

The assessment is used to identify and record any concerns and potential risks. The following actions can then be taken to address these issues:

- Remove risks - abandon the proposed policy or practice.
- Mitigate risks - amend the proposed policy or practice so that risks are reduced.
- Justify policy or practice in terms of other objectives.

1. Policy details	
Name of policy	Electric Vehicle Charging Strategy (EVCS)
Department and service	Environment and Transport (E&T), Development and Growth Branch Highway & Transport Commissioning Service Area Transport Strategy and Policy (TSaP) Team
Who has been involved in completing the Equality Impact Assessment?	<ul style="list-style-type: none"> • Lynne Stinson, Head of Service Highways and Transport Commissioning
Contact numbers	<ul style="list-style-type: none"> • Lynne.Stinson@leics.gov.uk
2. Objectives and background of policy or practice change	
<i>Use this section to describe the policy or practice change. What is the purpose, expected outcomes and rationale? Include the background information and context</i>	
What is the proposal?	The Electric Vehicle Charging Strategy (the Strategy) is a high-level, evidence based strategic document. For the first time, Council objectives and plans for EV charging are presented in one place. Development of the Strategy includes objectives, best practice and the challenges faced. The Council’s approach will continue to be ‘agile’, enabling flexibility and ability to react to changing circumstances.

	<p>The Strategy links to the Council’s Local Transport Plan 4 (LTP4) and focuses on how the Council will deliver EV chargepoints by 2035 in accordance with current Government targets, alongside other measures to facilitate the transition to EVs.</p>
<p>What change and impact is intended by the proposal?</p> <p>What is the rationale for this proposal?</p>	<p>The Strategy will impact drivers across all protected groups who live, work, study or visit the County. It will facilitate the transition to EVs by making it easier for drivers to find an EV 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 chargepoints 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> <p>Lack of EV charging infrastructure can have a wide-ranging negative impact, including on health, the environment, quality of life and the economy, potentially impacting on earning ability, access to life opportunities (such as healthcare, education and training) and social isolation.</p> <p>Increasing EV chargepoints and facilitating this increase will aid in providing opportunities for all residents, workers and visitors to Leicestershire. It will maximise social and environmental benefits and addresses wider social challenges, including air quality, accessibility, and health.</p> <p>The main driver for the Strategy is to ensure that there is an agreed and adopted approach for the roll out of EV chargepoints across the County to ensure that everyone has access to a chargepoint, which supports key objectives, policies and plans and focuses limited resources where they will provide the most benefit.</p> <p>The adopted Strategy will provide an agreed mandate and framework to guide and support the Authority’s work in delivering chargepoints through the Local Electric Vehicle Infrastructure (LEVI) Pilot and Full rollout projects, helping to inform investments in revenue and capital funded schemes and programmes.</p> <p>Government policy to phase out and end of sales of new petrol and diesel cars by 2035, will see all new cars and vans be fully zero emission at the tailpipe from 2035 (ending the sale of Plug-in Hybrid electric vehicles).</p>

	<p>Officers have been exploring opportunities to install Electric Vehicle Charge Points (EVCP) on the public highway, which is within the remit of Leicestershire County Council, using external Government grants such as LEVI funding.</p> <p>The aim of this scheme is to provide chargepoints to those who have no or limited access to off-street parking, to ensure that everybody has access to charging facilities, maximising equality and inclusion. A co-benefit is tackling emissions because everyone, no matter what their protected characteristic may be, is critical in tackling the climate emergency. The Council wants to provide electric charging infrastructure, to support residents and encourage shoppers/ commuters and other visitors to local facilities and businesses and is, therefore, installing on-street chargepoints in these areas of limited and/or no off-street parking and where there is evidenced parking demand.</p> <p>The total number of publicly available chargepoints across Leicestershire in April 2024 was 540. The number of on-street chargepoints is 0 (zero).</p> <p>As of December 2023, across Leicestershire there are approximately 13,100 registered private and company plug in EVs (PiVs) according to Government data. Forecasting estimates show that by 2030 there will be 128,300 EV registered in Leicestershire. It is estimated that this would generate the need for a minimum of 3,200 chargepoints to meet the forecast EV uptake.</p> <p>By 2040, it is estimated the 29% of car and van CO₂ emissions could be saved through switching to EVs.</p> <p>The Council's objective is to ensure that local transport network remains as safe as possible for all users and that it continues to be able to deal with current and future challenges as best as possible, contributing to the delivery of wider strategic objectives, including reducing the negative impact of local transport system on the environment, and improving health and accessibility.</p>
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<p>3. Evidence gathered on equality implications - Data and Engagement. <i>What evidence about potential equality impacts is already available? This could come from research, service analysis, questionnaires, and engagement with protected characteristics groups</i></p>	
<p>What equalities information or data has been gathered so far?</p>	<p><u>EV Survey and Interactive Map.</u> During October - November 2023, Leicestershire County Council undertook an engagement exercise, using a questionnaire and an interactive map to ask about barriers to EV charging as well as where the public would like to see an EV chargepoint located in Leicestershire.</p>

<p>What does it show?</p> <p><i>* Protected characteristics Age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex (gender), sexual orientation and community cohesion. Good practice also includes an assessment of needs and impact on other communities of interest.</i></p>	<p>The engagement exercise was held online, with paper versions being available on request, and directly engaged with the public, local representatives including elected members, district council councillors and parish councils.</p> <p>The engagement was advertised to the public via the Have Your Say page on Leicestershire County Council’s website, newspaper articles, social media posts on Facebook, Instagram, LinkedIn and Nextdoor as well as interviews with Mr Ozzy O’Shea CC (Cabinet Lead Member for Highways, Transportation and Flooding) on East Midlands Today and Fosse 107.</p> <p>Local representatives were engaged directly through email circulation to local members, the Leicestershire EV Charging Working Group including district council officers, and parish councils.</p> <p>In total, 540 responses were received on the EV survey, 53% of which were from current EV owners and 36% reported intention to own an EV in the future. And a total of 594 pins were placed on the social pinpoint interactive map, with 567 of these pins indicating a suggested location for a new EV chargepoint.</p> <p>There was a good distribution of responses received from across the County.</p> <p>The Office for National Statistics (ONS) provides census and labour market statistics via <u>Nomis</u>, which contains equalities data. Where appropriate, this information may be cross-referenced with Council data, for example for areas of deprivation. Leicester Shire Rutland Statistics and Research (<u>LSR</u>) also provides data, maps, reports and other useful information about communities in Leicester, Leicestershire and Rutland.</p>
<p>What engagement has been undertaken so far?</p> <p>What does it show?</p>	<p>A draft of the Strategy was provided to the E&T Departmental Equalities Group (DEG) on 27 July 2024, in order to help steer its development.</p> <p>Comments and suggestions already received have been considered and, where appropriate, incorporated into the Strategy. These comments included content, scope and roles and responsibilities.</p> <p>Going forward, appropriate engagement/consultation will be carried out during the LEVI Pilot Project and the LEVI Full Rollout of chargepoints. The Council will continue to take an evidence-based approach.</p> <p>Further engagement/consultation will also be carried out by the Charge Point Operator (CPO) during the delivery and installation phase of the LEVI Pilot.</p> <p>The Council will continue to take an evidence-based approach to inform the Strategy and will review this document alongside the Strategy document in two years.</p>

4. Benefits, concerns and mitigating action

Please specify if any individuals or community groups who identify with any of the 'protected characteristics' may potentially be affected by the policy and describe any benefits and concerns including any barriers.

Use this section to demonstrate how risks would be mitigated for each affected group

The Strategy will be an integral part of the Net Zero Action Plan and will help to deliver the Council's Net Zero targets for Leicestershire benefitting all road users by improving air quality and reducing CO₂ and NO₂ for more information on policies and strategies). There is currently no evidence to suggest that Council approach has had, or will have, a negative impact on protected groups, although this is something that will be monitored, along with all other trends (subject to the factors covered in point 3 above). The Strategy uses the evidence gathered as part of the EV Countywide survey to ensure that chargepoints are provided where the public have requested them, where they will be used and also in rural areas where CPOs are not likely to install a chargepoint on their own merit. This will focus the limited funding that the Council has been given and will provide the greatest benefits for the residents and commuters of Leicestershire. All users of the transport network, including pedestrians, cyclists, drivers and passenger transport users, will benefit, including protected groups. The impact on all protected groups is assessed as being **positive/neutral**.

Group	What are the benefits of the proposal for those from the following groups?	What are the concerns identified and how will these affect those from the following groups?	How will the known concerns be mitigated?
Age	<p>Expanding the charging network will help people to feel more comfortable in purchasing an EV due to concerns around battery range, thereby increasing the amount of people buying and leasing EVs.</p> <p>A reduction in the price of EVs through higher demand will therefore make EVs more affordable to younger people.</p>	<p>The Strategy is concerning all drivers and, therefore, the Strategy is targeted at persons over 17 that hold a provisional or full driving licence. The provision of Electric Vehicle Charging Infrastructure (EVCI) would be for all drivers regardless of age to assist them with driving EVs and will support those drivers of all ages to transition to EVs and support their mobility in and around the County.</p> <p>There are concerns that EV chargepoints could impact those with disabilities including those with age or pregnancy related health issues and the elderly. This would apply if chargepoints, intended to serve residential areas, are not within close proximity and are not fully accessible.</p> <p>There is also a potential trip hazard risk around trailing cables. However, many of these risks are mitigated with the CPO</p>	<p>Chargepoint operators (CPOs) to follow the Publicly Available Specification 1899 (PAS1899) guidance to ensure that older persons are able to use the facilities with ease.</p> <p>All chargepoints will be located at the kerbside to minimise the risk of trailing cables.</p> <p>As part of the accessibility standards, it is expected that CPOs will be required to ensure that the cables are visible.</p> <p>PAS 1899 guidance will provide advice and guidance to help</p>

	<p>Improve local air quality. (Poor air quality can disproportionately impact children and older people)</p>	<p>utilising the PAS 1899 guidance which defines what constitutes a fully accessible chargepoint and is considered best practice. This is not yet mandatory but will be most likely to be mandate in 2024/25. The Strategy review in 2026 may include detail on how concerns on disabled accessibility has been incorporated with this guidance.</p> <p>There is a concern that increased pavement clutter could result in barriers for some older people.</p> <p>People who are more dependent on a car due to age factors will need to be able to access EV charging points. However, ability to access EV chargers maybe be challenging to some (strength and dexterity) (elderly and those with a disability) if charging infrastructure is heavy/difficult to insert into the sockets or the technology is difficult to use, such as the use of smart phones and apps, which older people may not have access to.</p> <p>The inclusion of chargepoints will be an improvement in the provision of EV driving for current and future generations regardless of any specific characteristic.</p>	<p>reduce the weight of chargepoint cables will be suitable for pregnant persons to use without being too heavy and cumbersome.</p> <p>Chargepoints under 7kw will not be contactless and, therefore, will not limit those with smart technology to use them, rather it will be in a similar style to a parking meter in a car park, thereby being inclusive.</p>
<p>Disability</p>	<p>Chargepoints installed in disabled parking bays will allow access for all electric vehicle owners. Allowing greater movement and independence due to the availability of chargepoints in disabled parking spaces. People who are dependent on the car due to a disability will</p>	<p>Chargepoints need to be installed in areas of disabled parking as well as those without. There is a concern that increased pavement clutter could increase barriers for wheelchair users as well as pose a disproportionate risk to those suffering a visual impairment. Those with a visual impairment may require fixed street furniture. For example, with some chargepoints a wand is used to plug into the ground and also some can raise up from underground. This can be challenging due to the constant</p>	<p>Chargepoint operators to follow the PAS 1899 guidance to ensure that older persons and disabled users are able to use the facilities with ease. Chargepoints will be located at the kerbside to minimise the risk of trailing cables. As part of the accessibility standards, it is expected that</p>

	<p>need to be able to access EV charging points.</p> <p>Improve local air quality (poor air quality can disproportionately impact children and older people).</p> <p>Those over 60 are more likely to have age-related health conditions or disability.</p> <p>Those with disabilities or health issues may be more susceptible to health issues resulting from increased temperatures due to climate change.</p>	<p>changing of the chargepoint and lack of visibility, trip hazard and uneven surface.</p> <p>There are potential benefits for those with conditions that affect breathing as air quality is improved with switch from ICE (Internal combustion engine) to BEV (Battery electric vehicle).</p> <ul style="list-style-type: none"> • Increased EVs will mean less noise pollution making things more ambiently pleasant but problematic for those who use sound for safety. • There is potential for negative impact resulting from on-street electric vehicle chargepoints as trailing cables can pose a trip hazard and/or a barrier to many disabled people (this includes for people with a wide range of disabilities such as people with physical impairments, people who are blind/have low vision, people who may have a carer with them). • Areas where there are restricted widths and uneven road surfaces can contribute to exacerbating issues experienced by people with a wide range of impairment types by increasing barriers to accessibility. • As well as the potential for trip hazards and for reducing space resulting in barriers to many disabled people, it has been identified that there is potential for negative impact regarding safety for wheelchair and mobility scooter users as, surfaces will be uneven, potentially resulting in unsafe practices such as manoeuvring around these potential obstacles into traffic flow areas. • Advances in technology can be less accessible for some and it is identified that related difficulties in activities such as setting up user accounts, using charging points themselves have the potential to result in negative impacts, for example, for people with learning disabilities. 	<p>CPOs will be required to ensure that the cables are visible.</p> <p>The design, position and location of chargepoints need careful consideration to ensure that people with disabilities can use them easily. The connection point should be at a suitable height and the charger should not obstruct the footway or prevent access by people using wheelchairs. This means that some may need to be placed on buildouts in the carriageway or in parking bays.</p> <p>The Council recognises that potentially not all disabilities may be catered for due to the wide-ranging needs for individuals and the many different circumstances. The chargepoints are required to be able to be used by disabled drivers (includes height, reach of cables, visibility of screens and signage). The charging bays should not prevent disabled drivers from accessing chargers or charging ports. Kerbs, bollards and protective crash barriers should all be situated in a</p>
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Race	Increased provision of chargepoints will allow everyone to have access to public charging facilities.	<p>Leicestershire is a multicultural and vibrant county, with Leicester City at its heart. Many households have no members that have English as their main language. Information should be available to be provided in multiple languages to ensure access.</p> <p>There is potential for exclusion of people in different portions of this group. This could result from language barriers at charging infrastructure.</p>	<p>Information on the chargepoint via a QR code will be provided in a variety of languages so that everyone will be able to access the facility.</p> <p>It is the intention to have a good spread of chargepoints across the County to allow for access for all.</p>
Sex (gender)	Increased provision of chargepoints will allow people to charge in suitable and safe areas, close to home.	<p>There is a general concern that groups which are more worried about their personal safety when walking, could find accessing EV chargepoints more difficult.</p> <p>Women especially feel more vulnerable and unsafe in certain situations and in some areas. If EV chargepoints were to be installed on the public highway, adequate lighting would be some options required as well as potentially CCTV to ensure safety.</p>	The density of chargepoints and ease of use, as well as ensuring that the chargepoints are located in well-lit and safe areas, will help to mitigate these concerns. Chargepoints will be located in public areas and, where possible, not in isolated locations to further the safety of users.
Gender Reassignment	No evidence of a positive or negative impact on that group.	At this stage, impacts in respect of this Protected Characteristic are identified as being 'neutral' as none have been identified which have the potential to disproportionately affect people within this 'group'.	N/A
Marriage and Civil Partnership	No evidence of a positive or negative impact on that group.	At this stage, impacts in respect of this Protected Characteristic are identified as being 'neutral' as none have been identified	N/A

		which have the potential to disproportionately affect people within this 'group'.	
Sexual Orientation	No evidence of a positive or negative impact on that group.	At this stage, impacts in respect of this Protected Characteristic are identified as being 'neutral' as none have been identified which have the potential to disproportionately affect people within this 'group'.	N/A
Pregnancy and Maternity	<p>Increased provision of chargepoints will allow pregnant women to charge in suitable and safe areas.</p> <p>Improve local air quality (poor air quality can disproportionately impact on pregnant women and children, impact on unborn foetus in the womb and can cause disabilities).</p>	<p>There is potential for negative impact resulting from on-street EV chargepoints as trailing cables can pose a trip hazard and/or a barrier to people with a pram/pushchair. Areas where there are restricted widths and uneven road surfaces can contribute to exacerbating issues experienced by people with a pram/pushchair.</p> <p>In addition, it has been identified that there is potential for negative impact regarding safety for people with pram/pushchair as surfaces will be uneven, potentially resulting in unsafe practices such as manoeuvring around these potential obstacles into traffic flow areas. These issues relate to those who are pregnant and who may experience less mobility because of pregnancy.</p> <p>There is a concern that increased pavement clutter could increase barrier for prams and pushchairs.</p> <p>Similar considerations of this characteristic are to age/ disability regarding use of infrastructure if heavy/ challenging to connect.</p>	<p>PAS 1899 provides guidance for a diverse range of people which includes those who may be discriminated against such as being pregnant or on maternity leave.</p> <p>PAS, will provide advice to help CPOs design the chargepoints, e.g. reduce the weight of chargepoint cables, so that they will be suitable for pregnant persons to use without being too heavy and cumbersome, as well as be accessible to use in terms of height and reach of cables that could otherwise be problematic for heavily pregnant drivers.</p>
Religion or Belief	No evidence of a positive or negative impact on that group.	At this stage, impacts in respect of this Protected Characteristic are identified as being 'neutral' as none have been identified which have the potential to disproportionately affect people within this 'group'.	N/A
Other groups e.g., rural isolation, deprivation, health	Increased provision of chargepoints will allow many more residents to access EVs	<p><u>Technology</u></p> <p>EV chargepoints are increasingly becoming a digital service and accessed via smart phone. Older people are less likely to</p>	<p><u>Technology</u></p> <p>CPOs are able to have payment stations for chargepoints such as in carparks which will help those</p>

<p>inequality, carers, asylum seeker and refugee communities, looked after children, armed forces.</p>	<p>and enable greater independence and movement.</p> <p>Improve local air quality (poor air quality can impact on everyone, improving air quality will provide a better place to live and will enable more people to be active by having less polluting vehicles on the road and thereby making the outside a better place to be).</p>	<p>have a smartphone than the population as a whole and, overall, are less likely to be digitally enabled/confident.</p> <p>Most EV charging services are cashless and debited to the passenger's card/bank account via an App. Around 1.5 million people in the UK do not have bank accounts, which could mainly impact residents with lower incomes.</p> <p><u>Poverty and Financial Inclusion</u></p> <p>There is a concern that some groups with protected characteristics have a higher proportion of people on lower incomes, which makes EV ownership/leasing more challenging. 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.</p> <p>The densities and phased approach to installation (supply of chargepoints is in alignment with demand), should mean that those without EVs are not significantly impacted in terms of their ability to find parking spaces. However, the demand of paying for both parking and charging provision may mean the cost of owning an EV is still too great.</p> <p>Charging an EV at public EV charging facilities is usually more expensive than for those who can charge from home.</p> <p>This is linked to the costs associated with installing, maintaining, and operating the facilities as well as differences in VAT.</p> <p>Tariffs vary depending on the CPO, type of charging and energy price fluctuations amongst other things.</p> <p><u>Rural Isolation</u></p> <p>The majority of Leicestershire is rural with small settlements spread out across the County. Residents in these areas will be less likely to have public on-street charging points due to the</p>	<p>without smart phones and the App.</p> <p>Increasingly, contactless payment is available, but is dependent on the CPO and if they offer that chargepoint functionality.</p> <p><u>Poverty and Financial Inclusion</u></p> <p>The price of charging is set by the CPO.</p> <p>The Council will not have full control over the setting of EV charger tariffs at its chargers under a concession contract. Whilst it is not possible to address the higher price of electricity at public chargepoints through this procurement, the Council should look to ensure that residents have access to market competitive tariffs so that those without access to off-street parking have the option of EV ownership supported by a commercially sustainable network. In addition, innovative on-street home charging solutions will continue to be investigated.</p>
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		<p>lack of commercial viability for the CPOs to install chargepoints in these locations. This can lead to people being isolated especially with the reduction in public transport services, which means the private vehicle is the choice for many. To enable the residents of these communities to think of switching to an EV will mean that the charging infrastructure needs to be installed first due to concerns on battery range.</p> <p>LEVI would also have a positive impact on rural isolation as it allows for a sustainable form of transport in rural areas where we expect car demand will remain.</p> <p><u>Deprivation</u></p> <p>There are concerns that more deprived areas will not get EV chargepoints installed and that they will then miss out on being able to own or lease an EV; especially with the prices of EVs and charging increasing or being too expensive.</p> <p>This can then limit people to cheaper more polluting vehicles which may not then be able to go into any Clean Air Zones (CAZ) without additional costs, therefore, actually increasing the amount spent over a timeframe than an upfront initial price which may be outside of their financial remit. This may have a knock-on effect to not being able to access jobs and services easily.</p> <p>There are some potential positive impacts as climate change can disproportionately impact low-income neighbourhoods where there can be less resilience to issues such as flooding. LEVI would have impact on helping the climate crisis by reducing carbon emissions.</p>	<p>Addressing the price differential of petrol/diesel vs EVs is out of the scope of this Strategy that is focused on charging infrastructure.</p> <p><u>Rural Isolation</u></p> <p>The LEVI Full Rollout Project will help to mitigate this by ensuring that a certain percentage of chargepoints are installed in rural settlements as part of the funding criteria.</p> <p><u>Deprivation</u></p> <p>As per the Rural Isolation topic, the LEVI Full Rollout Project will look to install EVCP's in all areas across the County. After speaking to several CPOs, this is less of an issue as it is believed that leasing vehicles will mean that everyone has equal chance of owning an EV as well as certain employments utilising EVs already, such as light goods vehicles (e.g. Amazon drivers).</p>
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5. Action Plan and Recommendations			
<i>Use this section to describe concerns further. Produce a framework to outline how identified risks/concerns will be mitigated.</i>			
What concerns were identified?	What action is planned?	Who is responsible for the action?	Timescale

Need to explain the scope of the EV Charging Strategy.	Amend the draft EV Charging Strategy: Explain scope of EV Charging Strategy (what it will, and will not, cover)	Lynne Stinson	April/May 2024
Need to include the roles and responsibilities to ensure that all partners and stakeholders are aware of these.	Amend the draft EV Charging Strategy to include Roles and Responsibilities, not just for the council but also other partners and stakeholders.	Lynne Stinson	April/May 2024

6. Way forward	
How will the action plan and recommendations of this assessment be built into decision making and implementation of this proposal?	The EV Charging Strategy will be updated to reflect early comments on its development.
How would you monitor the impact of your proposal and keep the EIA refreshed?	The Strategy will be reviewed after two years (2026), due to the LEVI Pilot project currently in development, with installation of chargepoints in late 2024/2025, which will allow lessons learnt to be included within the Strategy as well as Key Performance Indicators, as well as allowing Council officers to further understand chargepoints, any problems/ issues, best practice and working with a CPO. The LEVI Full Rollout will again provide more experience and knowledge allowing the EV Strategy to be reviewed as necessary.
Sign off by DEG Chair/Director or Head of Services	Janna Walker, Assistant Director Development and Growth