

NDA submission to Department of Transport on Electric Vehicle Charging Infrastructure Strategy 2022-2025

## May 2022

# Introduction

The National Disability Authority (NDA), as the independent statutory body, provides information and advice to the Government on policy and practice relevant to the lives of persons with disabilities. We have a role to assist the Minister for Children, Equality, Disability, Integration and Youth in the co-ordination of disability policy. We work through our [Centre for Excellence in Universal Design](http://universaldesign.ie/) to promote the universal design of the built environment, products, services and information and communication technologies so that they can be easily accessed, understood and used by everyone, including persons with disabilities.

The NDA welcomes the opportunity to submit feedback on the Electric Vehicle Charging Infrastructure Strategy 2022-2025 which aims to consider the changing and increasing charging needs of the population in both urban and rural settings and will detail the charging infrastructure needs in four main categories:

* Home/apartment charging
* Residential Neighbourhood charging
* Destination Charging and
* Motorway/En-route charging

The NDA wishes to provide some key information and advice to the Department of Transport to assist them in taking a universal design approach as outlined in the strategy.

# Transport for People with Disabilities

Ireland’s population is changing. In the 2016 Census, the overall number of people with disabilities has increased, comprising 13.5% of the total population compared to 13% in 2011. There are now 643,131 people with a disability living in Ireland.[[1]](#footnote-1) People are living longer, as can be seen in the changes in the population aged over 65 which has increased by 19.1% since 2011. According to the 2016 Census figures the number of people aged 66 has increased to 637,567 people (13.4% of the population).[[2]](#footnote-2)

The importance of integrated universally designed transport services that include the built environment and information and communication technologies is underpinned by [Article 9 of the UN Convention on the Rights of Persons with Disabilities.](https://www.un.org/development/desa/disabilities/convention-on-the-rights-of-persons-with-disabilities/article-9-accessibility.html) Ireland ratified the UN Convention in 2018. Article 9 states that in order for persons with disabilities to live independently and fully participate in all aspects of life, they need to have access not only to accessible transportation but also to infrastructure, the built environment, information and communication processes and technologies and to other public facilities and services.

# Universally Designed Consultation

The NDA welcomes the commitment under Principle 2.2 of the Strategy which states that the strategy aims to ensure:

“A fully inclusive EV charging infrastructure network will work for everyone regardless of age, health, income or other needs to ensure a fair and equitable transition to large-scale EV use. To ensure access for all citizens, principles of universal access and universal design will be considered at all stages of EV infrastructure development, from planning and design stages to operation and use.”

The NDA recognises the commitment to universal design at all stages of EV infrastructure development, from planning and design stages to operation and use to ensure access for all citizens. However, we note that on the [webpage promoting the strategy](https://www.gov.ie/en/consultation/0a579-public-consultation-on-the-electrical-vehicle-charging-infrastructure-strategy/?referrer=http://www.gov.ie/EVconsultation/) no alternative or accessible formats of the strategy are available, nor is there a clear way for those who may require the document in alternative formats to obtain same. Under section 28 of the [Disability Act, 2005](https://www.irishstatutebook.ie/eli/2005/act/14/enacted/en/print.html) public bodies should, as far as is practicable, make oral and written communication accessible when customers with impairments request them, make electronic communication accessible to customers with vision impairments who use assistive technology, and make relevant information accessible to customers with intellectual disabilities. The most efficient way of ensuring this is to provide alternative formats of documentation or provide the public with a clear way of requesting alternative formats.

Additionally, accessible information is one of the key criteria for universally designed services that should be incorporated into the consultation process for this project. All information (written, spoken, signed and digital) delivered by public services (which includes consultation information), should be universally designed. Accessible information includes; audio visual announcements, information received from self-service terminals, processes for requesting information and making complaints.

The NDA suggests thatthe Department of Transport can refer tothe [Customer Communications Toolkit for the Public Service - A Universal Design Approach](https://universaldesign.ie/products-services/customer-communications-toolkit-for-the-public-service-a-universal-design-approach/customer-communications-toolkit-for-the-public-services-a-universal-design-approach.pdf)**[[3]](#footnote-3)** which will help to produce universally designed written, verbal and digital communications that can be easily accessed, understood and used by everyone for this consultation, future consultations and all stages of this project.

We wish to stress that services cannot be universally designed unless they take into account a wide range of individuals. There is no “average” or “ideal” person. For example, two individuals of average height, might have very different arm lengths, leg lengths, and capabilities. Those implementing Universal Design seek to consider human variability in their work and produce designs that work equally well for everyone- this is why the NDA encourages ‘sampling the tails’ when seeking out input and feedback from the public.[[4]](#footnote-4)

# Accessibility of Charging Infrastructure

The NDA also wishes to emphasise that the design and procurement of certain products and services must comply with [EU Directive 2019/882](https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32019L0882)on the accessibility requirements for procurement of products and servicesandin particular for information and communications technology to be accessible for people with disabilities (harmonised standard EN 301 549). This includes requirements to do with user interface. It is important to keep these requirements in mind, particularly at the procurement phase of the project.

Last year Irish EVs published an article regarding [EV charging availability](https://www.irishevs.com/ev-charging-accessibility-failing-disabled-drivers). At the time this article was written Irish EVs found there were only 4 wheelchair accessible ESB electric vehicle chargers in Ireland: It should be stressed that accessible spaces at EV charging stations should not count toward the minimum number of accessible car and van parking spaces required in a parking facility.

On this subject, the NDA’s Centre for Excellence in Universal Design provides [guidance on the built environment](https://universaldesign.ie/Built-Environment/Building-for-Everyone/1-External-Environment.pdf) which provides technical specifications for accessible parking spaces. It also provides guidance on the amount of car parking spaces generally which should be allocated as accessible parking and would be a useful guide for the Department to follow when designing and building EV charging facilities in residential neighbourhoods, destination charging and motorway charging. This guide also provides details on pavement width to facilitate walkability. The NDA recommends that the Department take this into account when considering charging infrastructure in order to ensure paths are not made inaccessible for persons with disabilities but also for people who are using prams, shopping trollies etc.

In determining key areas of focus of consultations with persons with disabilities, Motability UK published [a scoping and discovery report on Accessible EV Charging](https://www.motability.org.uk/media/rp4l5tdu/ev-charging-scoping-and-discovery-report.pdf), which may be useful in providing an overview of the issues faced. The main issues which were presented from the findings were; lack of adequate space for maneuvering, lack of clear access ways to the charging station, variability in operation of the charging machines, charge points which were not designed with a variety of users in mind, and lack of accessible and easy to understand information about charging points.

The NDA would like to remind the Department that a Disability Impact Assessment is an obligatory requirement of all substantive proposals requiring Government approval as stipulated in The Cabinet Handbook when there is:

• a change in policy;

• the introduction, abolition or significant change in an existing scheme; or

• a decision which impacts on the public at large, or

• on a significant subset of that population.

It is evident that the Electric Vehicle Charging Infrastructure Strategy represents a significant change and would impact the public at large, therefore the requirement for such an assessment is evident. The Department of Justice provides Guidelines on How to Conduct a Disability Impact Assessment.

The NDA also wishes to advise that the Department of Transport will need to take account of the European Accessibility Directive (EU) 2019/882, on the Accessibility Requirements for Products and Services (European Accessibility Act). Member states are obliged to transpose the European Accessibility Act (EAA) into national legislation by 28th June 2022 with implementation commencing from June 2025. Accessibility requirements are binding on public administration organisations **and** the private sector, that is, anyone who produces or provides products or services falling within the scope of the EAA. From 28 June 2025 the legislation will apply to a wide range of products and services, including Payment terminals and certain self-service terminals.

Further to this, the NDA would like to remind the Department that Section 27 of the Disability Act, 2005 requires the head of a public body to ensure that services provided and goods supplied to the public body are accessible to people with disabilities, unless that would not be practicable, would be too expensive, or would cause an unreasonable delay. [[5]](#footnote-5) As such the [Code of Practice on Accessible Public Services and Information provided by Public Bodies](https://nda.ie/Good-practice/Codes-of-Practice/Code-of-Practice-on-Accessibility-of-Public-Services-and-Information-Provided-by-Public-Bodies-/Code-of-Practice-on-Accessibility-of-Public-Services-and-Information-Provided-by-Public-Bodies.pdf) highlights that procurers in public bodies should highlight accessibility "as a criterion to be considered throughout the entire tendering process (from drawing up and running tender competitions through tender evaluation and placing the contract to final debriefing)".

To assist the Department in meeting these requirement the NDA recommends communication and consultation with persons with disabilities and older people to determine their needs with regards to any changes and updates to charging infrastructure. This will ensure that EV charging infrastructure takes a universal design approach.

# Conclusion

Taking a universal design approach can help address commonly encountered barriers with regards to EV charging as well as assist the Department in meeting all legislative requirements. When looking at implementing or improving infrastructure the NDA always promotes taking a universal design approach. Universal design promotes design and composition of an environment so that it can be accessed, understood and used to the greatest extent possible by all people regardless of their age, size, ability or disability.

Transport plays a crucial role in empowering people with disabilities to participate in everyday life and the activities of their communities. Approximately one in ten people with disabilities said that inadequate/inaccessible transport systems prevented them from participating in social events.[[6]](#footnote-6) About one in six people with a disability are not in work who would be interested in a job, cite transport or parking as an issue for them. Those with sight, mobility or intellectual disabilities are most likely to cite transport as an issue for employment.[[7]](#footnote-7)

The NDA is happy to meet with the Department to discuss this submission. The NDA is looking forward to continuing to work with the Department to develop and implement integrated universally designed transport services.

1. Census 2016 [↑](#footnote-ref-1)
2. Census 2016 [↑](#footnote-ref-2)
3. https://universaldesign.ie/products-services/customer-communications-toolkit-for-the-public-service-a-universal-design-approach/customer-communications-toolkit-for-the-public-services-a-universal-design-approach.pdf [↑](#footnote-ref-3)
4. <https://universaldesign.ie/products-services/guidelines-on-body-size/> [↑](#footnote-ref-4)
5. <https://www.irishstatutebook.ie/eli/2005/act/14/enacted/en/html> [↑](#footnote-ref-5)
6. National Disability Survey (2006) Vol. 2, Table 7.30 [↑](#footnote-ref-6)
7. National Disability Survey (2006) Vol. 2, Table 7.30 [↑](#footnote-ref-7)