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**29 April 2022**

**Subject: Consultation on PAS: 1899:2022 - Accessible charging**

We are pleased to have the opportunity to provide feedback on the draft standards for accessible charging and to have been involved with their development through our participation in the review panel.

Our relevant area of expertise and statutory responsibility is energy consumer advice and advocacy. At Citizens Advice, we use our insight about people's problems to understand how policy and regulation play out in practice for people and we advocate for improvements. We have a vision of a public charging network that is inclusive by design, accessible to all, easy to use, reliable and fairly priced. Policy and regulation must recognise the essential need for people to charge their vehicles and the critical role that a high-quality public charging network must play.

We welcome feedback from those with expertise on the technical details of the proposed standards; this is not our expertise and therefore we cannot comment on the technical aspects of the standards.

There are currently no standards that ensure disabled people's access when designing and installing chargepoints.<sup>1</sup> It has been projected that in 2035, when the sale of all new petrol and diesel vehicles (including hybrids) are banned, there will be 2.72 million disabled drivers and passengers. Up to 50% of these drivers and passengers are expected to be partially or wholly reliant on the public charging infrastructure<sup>2</sup>. It is therefore crucial that accessibility is built into

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<sup>1</sup> Motability and Ricardo Energy and Environment (2020) [Electric Vehicle charging infrastructure for people living with disabilities](#)

<sup>2</sup> Ibid.

**Patron HRH The Princess Royal      Chief Executive Dame Clare Moriarty**

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the charging network as soon as possible and ahead of the anticipated uptake of electrical vehicles (EVs). We are therefore pleased that steps have been taken to embed accessibility in the proposed standards. There is the opportunity for the standards to set a high bar for the minimum level of accessibility for all public chargepoints; to baseline at a level whereby all consumers have a good experience of using public chargepoints and not just a manageable one.

We feel there are some opportunities to maximise the impact and clarity of the standards, under the following three areas.

- Some requirements should be clearer and more specific
- Compliance with the standards must be enforceable
- Learnings from other sectors should be incorporated

### **Some standards should be clearer and more specific**

The phrasing of some of the draft standards is quite ambiguous in places. It's often unclear precisely what a company must do and what outcome they must achieve to meet the standard. This creates a risk that companies will interpret them differently, leading to inconsistencies across companies and a poorer experience for some people using the charging network.

All standards should be outcome-based and clearly linked to achieving a specific aim. This would support companies to understand how they should interpret and achieve the criteria, leading to better compliance and easier enforcement.

An example of a standard we consider to be clear and unambiguous is clause 5.3.1, as there are clear outcomes by which compliance could be measured.

#### 5.3.1 Cable weight & cable management systems

"For all tethered public chargepoints, a cable management system shall be included in the physical design of the chargepoint to ensure that the weight of the charging cable is minimized."

There are some standards that could be rephrased to make them clearer and less open to interpretation (see relevant examples set out below). For each of these, it should be clear what actions a company should take and what outcomes they should achieve in order to demonstrate their compliance.

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Clause	Current phrasing	Comment / suggested phrasing
5.5.2 Screen/visual interface light, colours and text size	<p><i>“The content and text on a screen or visual interface on a public chargepoint shall be easily readable for those with vision impairments and colour blindness; consideration shall also be given to the needs of those for whom English or Welsh is not their first language, including British Sign Language users.”</i></p>	<p><i>“Those for whom English or Welsh is not their first language, including British Sign Language users, must be able to understand the content and text on the interface. This could be achieved through the use of symbols or access to a relay interpretation service, for example.”</i></p>
5.5.4 Screen/visual interface considerations for people with a learning disability or neurodiverse condition	<p><i>“The instructions and information provided on any screen or visual interface on a public chargepoint shall be produced in easily understandable and plain English or Welsh, and shall consider the use of simple symbols to convey information.”</i></p>	<p><i>“Those with a learning disability or neurodiverse condition must be able to understand the content and text on the interface. This could be achieved through the use of simple symbols.”</i></p>
7.4 Distance between public chargepoints and amenities or a venue	<p><i>“Chargepoints located in a public car park or other on-street location adjacent to amenities or a venue shall give due consideration to installation and situation in prominent and visible locations close to amenities or a venue to improve accessibility of amenities or a venue from public chargepoints.”</i></p>	<p>This is likely to be difficult to enforce in practice without a clear requirement for chargepoints to be within a specific distance of amenities or a venue. The definition of “close to” is very open to interpretation.</p>

<p>8.1 Remote digital platforms for public chargepoints</p>	<p><i>“Those responsible for the provision of public chargepoints (i.e. the procurer of the chargepoints) shall ensure that the operation of public chargepoints is supported by a remote digital platform such as a smartphone application, including all necessary back office operational requirements.”</i></p>	<p>It could be specified more clearly here that back office operational requirements must be sufficient to cope with demand.</p> <p>Providing smartphone applications and phone numbers without scaling up capacity to cope with increasing demand could result in negative experiences, especially for those who rely on public charging and those with accessibility needs.</p> <p>A clearer way of phrasing this could be: <i>“including all back office operational requirements sufficient to provide a good service”</i></p>
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**Compliance with the standards must be enforceable**

The efficacy of the standards will heavily depend on a clear and robust enforcement process. We recommend the addition of a clear explanation of the compliance and enforcement process, either in additional guidance or within the annex of the standards. This should clearly explain how compliance with the standards will be monitored, the name of the monitoring body and the mechanism for enforcement (what measures can be put in place to ensure a company in breach of the standards improves).

**Learnings from other sectors should be considered**

We are pleased to see that a wide variety of sources and best practice have been used to develop the standards. We would recommend that, in addition, learnings from other sectors are considered, in particular the [design guidelines on access to ATMs](#) developed by the Centre for Accessible Environments and the [accessible in-home display](#) developed by Smart Energy GB and the Royal National Institute for the Blind (RNIB).

In summary, we welcome these draft standards and commend the work of the BSI, OZEV, Motability and the review panel on getting them to this stage. In the final version, we would like

to see less ambiguous phrasing, a clear explanation of the enforcement process and the consideration of further learnings from other sectors.

This submission is non-confidential and may be published on your website. Please let us know if you require any clarification about any of the points raised in our response.

Yours sincerely,

Rachel Mills and Nicola Bailey

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