

# Scottish Building Regulations: Proposed Changes to Energy Standards, including ventilation, overheating and electric vehicle charging provision

## RESPONDENT INFORMATION FORM

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**Are you responding as an individual or an organisation?**

[ ]  Individual

[x]  Organisation

**Full name or organisation’s name:**

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**If an Organisation, please select type:**

|  |  |  |  |
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| Local Authority | [ ]   | Commercial Organisation (other) | [ ]  |
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| Contractor/Developer | [ ]  | Housing Provider / RSL | [ ]  |
| Designer/Consultant | [ ]  | NDPB/Agency | [ ]  |
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[x]  Yes

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Signed:

Rachael McMurchy 30/11/2021

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## RNIB Scotland Response

**Information for organisations:**

The option 'Publish response only (without name)’ is available for individual respondents only. If this option is selected, the organisation name will still be published.

If you choose the option 'Do not publish response', your organisation name may still be listed as having responded to the consultation in, for example, the analysis report.

### Introduction

The Royal National Institute of Blind People (RNIB) Scotland is the country’s leading charity working with blind and partially sighted people. We support children and adults with sight loss and help them to live full and independent lives, campaigning for their rights.

While blind and partially sighted people will not be drivers of electric vehicles, individuals with sight loss will have to navigate environments where the charging units are situated. For this reason, we believe accessible and consistent design standards should be embedded within regulation and planning.

We welcome the opportunity to respond to the: "Scottish Building Regulations: Proposed Changes to Energy Standards, including ventilation, overheating and electric vehicle charging provision".

### Consultation Questions

This consultation seeks views on a wide range of issues. We have confined this response this to questions relating to Electric Vehicle Charging Infrastructure, questions 51, 55 and 56.

#### Part 7 – Electric Vehicle Charging Infrastructure

#### Question 51 –

**What are your views on our policy goal to enable the installation of Electric Vehicle (EV) charge points and ducting infrastructure (to facilitate the future installation of EV charge points) for parking spaces in new residential and non-residential buildings parking?**

RNIB Scotland understand that electric vehicles are an increasing part of the transport landscape, and we support the environmental benefits associated with them. However, we have concerns about the potential for charging units to increase street clutter and present obstacles and trip hazards for people with sight loss.

The consultation document, at p86, states that "We [the Scottish Government] are focused upon ensuring that all consumers and businesses benefit from affordable, reliable and accessible charging infrastructure in Scotland."

Provisions relating to accessibility are covered within Section 7.7 and point 7.7.1 outlines minimum provision standards for new developments in relation to accessible parking.

We consider that accessibility needs extend beyond the provision of accessible parking.

Moreover, the accessibility needs of all individuals in society, including those who are blind and partially sighted, should be considered within environments where EV charging units are present.

To allow for this, we would welcome guidance on the size, positioning, and colour contrast of EV charging units. We would also advocate for minimum design standards regarding the storage of charging cables and proximity of units to the kerb and provision of clear footpaths.

#### Question 55 –

**What are your views on the proposed provision for charge points for accessible parking spaces? Do you have examples of current best practice for the provision of charge points for accessible parking spaces?**

RNIB Scotland welcomes the proposed inclusion of dedicated EV charging points within accessible parking bays.

The consultation document says that:

"Scottish building regulations do not require car parking at new developments but, where parking is provided, seek provision of accessible parking spaces and associated means of access."

We would appreciate greater clarification of the term "means of access". That is, does the term simply mean the means of getting in and out of the parking area? We think that consideration should be given to the whole parking environment and structures within it, including EV charging units, to ensure that people who are blind and partially sighted can navigate safely.

#### Question 56 –

**Do you have any other views that you wish to provide on the EV section of the consultation (e.g. the minimum standard of EV charge point or safety within the built environment)?**

Section 7.7.2 of the consultation document states that:

"We are building up our understanding and evidence-base to inform our overall approach".

The design and structure of EV charging points will be critical both for the success and the accessibility of Scotland's EV infrastructure.

RNIB Scotland has taken part in a number of webinars in relation to EV charging plans. During these sessions, we expressed concern that there appeared to be a desire to establish a regulatory framework without building in consideration of the design of the structures and without considering timeframes and monitoring for implementation. Design will be central to how and if this infrastructure works for people especially in terms of accessibility. Developing an understanding and an evidence base should draw on international examples, for instance, the so-called "Norway Model".

### For further information please contact:

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