



## Oxfordshire Liveable Streets

### Response to consultation “Countywide - proposed Electric Vehicle charging only parking spaces (July 26)”

[https://letstalk.oxfordshire.gov.uk/oxfordshire\\_electricvehiclecharging\\_july2026](https://letstalk.oxfordshire.gov.uk/oxfordshire_electricvehiclecharging_july2026)

We support the expansion of EV charging as essential for sustainable transport, but object to the way these schemes are being brought forward and the assumption that chargers should be placed on the footway. The lack of information provided makes it hard to evaluate the individual schemes properly, but we object to most of them.

**We urge that this decision be deferred and officers asked to come back with layouts that avoid encroachment onto footways.** In the longer term, we feel this kind of spatial allocation needs to be done in the framework of a kerbside strategy.

We discuss a number of points in turn. A summary table follows that, and some comments on the specific locations proposed.

#### **Lack of a Kerbside Strategy**

There are other potential uses of the kerbside space proposed to be used for EV charging, but those have not been evaluated. In the absence of a proper kerbside strategy, there is no coherent way to prioritise different possible uses of this space. And the infrastructure involved is not easily reversible - cabinets, ducting and feeder pillars are effectively permanent - so the kerbside space committed here can not easily be reassigned later.

In most of these locations there is no public cycle parking and that should be prioritised over EV charging, in line with Local Transport and Connectivity Plan Policy 33: "Ensure the parking requirements of all modes of transport are considered, in line with our transport user hierarchy". Micromobility bays are another option. Both of these are more sensitive to location than car charging bays and should normally take "prime" locations closest to the destinations or housing they serve. Seating, planting, cycle hangars, car-club bays and loading are also possible uses. None of these appear to have been considered.

### **Degrading Walking and Wheeling**

Taking space away from footways to provide charging infrastructure for private cars runs directly against the Transport User Hierarchy in Policy 1 of the Local Transport and Connectivity Plan. People walking and wheeling are at the very top of that hierarchy and private motor vehicles are at the very bottom.

So the presumption should be that EV charging infrastructure goes on the carriageway, not the footway. If there's a reason infrastructure can't go on the carriageway and an adequate width footway can be maintained, allowing for e.g. bins, then maybe chargers can go on the footway. But these cases should be exceptions, not normal.

On footway widths, *Inclusive Mobility* says "under normal circumstances, a width of 2000mm is the minimum that should be provided" and the Oxfordshire Walking Design Standards (paragraph 2.2.1) sets 2 metres as the minimum preferred footway width. Unless a clear 2 metre gap will be left for people walking and wheeling, chargers should go on the carriageway rather than on the footway.

The following photo shows the proposed Kings Cross Rd site. We don't see how putting EV chargers on the footway here is at all reasonable given the footway is already only 1.6m wide (and given how much space there is on the carriageway).



*Inclusive Mobility* does list electric vehicle charging points among the obstacles for which an absolute minimum footway width of 1000mm may apply. But it specifies (in Section 4.2) that this is only "If [alternatives are] not feasible due to physical constraints" and "where there is an obstacle". It is possible to put the chargers on the carriageway – there are no physical constraints requiring them to be on the footway – so reducing footways below two metres is not consistent with *Inclusive Mobility*. Also, the locations of these bays are not fixed. If on-carriageway infrastructure is not possible in one location, other locations should be considered before footway annexation.

An additional consideration is that there are occasions when people need to push cycles on the footway. But the LTN 1/20 "design cycle" is 1.2m wide, and more space may be needed if someone is walking alongside a cycle.

The proposed layout at The Phelps in Kidlington shows that locating chargers on the carriageway is possible. The following photo of older EV charging bays on Southfield Rd (credit: Simon Banks) illustrates how charging infrastructure can be sited without intruding onto the footway. (Kerb buildouts like this are not necessary.)



We are not just talking about a few narrowings of a few footways. These bays are the forerunners of many and it is plausible that eventually most or even all kerbside car parking will come with charging infrastructure. In which case the approach taken here will involve a massive reallocation of space away from people walking and wheeling to car drivers, with pinch points for pedestrians every 11 metres.

Indeed we see no reason footways should be reduced even to 2 metres: *Inclusive Mobility* says that “Footways and footpaths should be made as wide as is practicable”. So the first question should be “is it possible to put the charging infrastructure on the carriageway?” If so, then it should be there and not on the footway. On residential streets, people might like to be able to stand around and chat, without having to move aside every time someone walks past. People might want to walk side-by-side, without having to interrupt their stride every 11 metres. On some days bins may reduce the effective space. And so forth.

### **Equalities Impact**

The worst affected by reductions in footway space will be among the most vulnerable: people using wheelchairs or walkers, people with disabilities, parents pushing buggies or strollers or walking with small children, frailer and slower adults, and so forth. Some blind and partially-sighted users navigate by “tapping along” kerblines.

Introducing new permanent obstructions to footways engages the public sector equality duty under section 149 of the Equality Act 2010, which requires the council to have due regard to the need to eliminate discrimination and advance equality of opportunity for disabled people. *Inclusive Mobility* states that following its guidance supports compliance with that duty, and that the needs of disabled people should be considered from the outset of a scheme. Designing to a national absolute minimum is not the same as having due regard to that effect.

We would expect to see an Equality Impact Assessment for the programme as a whole, but also assessments for each individual scheme where footways are being encroached on.

### **Inconsistency with Other Decisions**

Last month the county council passed a motion calling for an end to pavement parking. That didn't say anything about allowing pavement parking provided 1.2m footway width was left, and the large number of people objecting to cars obstructing footways are not going to be any happier about EV chargers obstructing them instead.

In January, in decisions about the Headington Central and East Oxford CPZs, all proposals to create new car parking bays were rejected.

Last year there was a proposal to move four parking bays on Frenchay Rd, in north Oxford, onto the footway, reducing its width from 2m to 1.5m. That proposal was sent back to officers to find a solution that didn't involve taking space from the footway, and the parking bays ended up being removed instead. This is a precedent for prioritising footway width (to at least 2m) over maintaining car parking.

### **Loss of Car Parking**

The user hierarchy makes it clear that space allocation should favour people walking and wheeling over private cars, as do the precedent decisions. And LTCP Policy 33 says: "We will take measures to reduce and restrict car parking availability". So reducing car parking is actually supported by county policy.

No information is provided about this, but looking at the scheme proposed for The Phelps suggests an on-carriageway charger will need 1.41m of kerb space. Since a charger will serve two 5.5m bays, it appears an extra 13% of kerbside space will be needed for on-carriageway charging, at least in typical configurations. That is a loss of one car parking space in eight, but that is a worst case scenario.

- In many places, existing bays have some spare length and a charger can be fitted in without a reduction in the number of cars that can fit into the bay.

- In some places there is no footway and the siting of chargers will not obstruct walking and wheeling.
- Where there are verges or other buffers between the carriageway and the footway, there may be room to put in chargers without taking space from either.
- Many of the proposed locations are “right-angle-to-kerb” bays in parking lots, with enough space for cars to park a little further away from the kerb (the width of the chargers is not given anywhere).
- Poorly spaced parking often results in inefficient utilisation of a bay, and having bays delineated by chargers will prevent suboptimal spacing.

It is plausible that the actual loss in parking will be closer to 5% - which means that if 20% of all parking bays get charging, the overall reduction in parking provision will be just 1%. And even that will happen slowly and steadily as EV chargers are rolled out, allowing time for people to adapt.

### **Misleading Framing**

The consultation seems a little underhand about where the EV chargers will be located. The information pamphlet promises that: “Where EV chargers are installed on residential streets, these will be discrete and placed as considerately as possible, keeping pavements free for walking and wheeling”. Which most people would understand as meaning charging infrastructure will be kept off pavements. But delving into the individual scheme plans reveals that almost all of them do propose to take space away from footways.

### **Lack of Information**

The consultation provides footway widths in some (but not all) proposed locations, but does not give the dimensions of the charging cabinets, nor their spacing from the carriageway edge. And no photos of examples are provided. This makes it impossible to evaluate how badly these schemes will downgrade the walking and wheeling experience on the streets involved.

The dimensions of chargers and their proposed spacing from the carriageway edge should be provided and, for each scheme that encroaches onto the footway, the footway width proposed to be retained.

### **Lack of Consultation**

The consultation refers to “consultation with Town & Parish Councils, and informal consultation with residents, followed by shortlisting through internal expert assessment, further stakeholder engagement”. But there has been no consultation

with members of the Coalition for Healthy Streets and Active Travel: neither Oxford Pedestrians Association nor Oxfordshire Liveable Streets were consulted, nor as far as we can tell were any of the other CoHSAT members, despite the implications of the schemes for walking, wheeling and kerbside space allocation. And the Summertown and St Margaret's Neighbourhood Forum was not consulted about the schemes on Kings Cross Rd or Water Eaton Rd, despite those being inside the Forum area.

### **Rules Restricting Use**

Where EV charging bays are inside CPZs, use should be restricted to permit holders, otherwise the bays will be used for commuter parking. This will be an increasing problem as more charging bays are deployed.

It would also be good if there was more consistency about the rules applying to bays. As it is, some have restrictions only Monday to Friday, some Monday to Saturday, some all week. Some have time restrictions, others don't. So the Kings Cross Rd bays are "SM Permit Holders only Mon-Fri 10am-4pm, and any other EVs outside these times", while the nearby Water Eaton bays are "Mon-Fri 8am-6.30pm by NS Permit Holders or for non-permit holders 2 hours with no return in 2 hours, and any other EVs outside these times".

We understand the need for local flexibility, but this plethora of different restrictions seems likely to be problematic, especially for those bays that are - at least at some times, on some days - usable by people living outside the area who may not be aware of the local rules. (Unlike the location of the bays, however, the restrictions on their use will be relatively easy to change.)

### **Discoverability**

It will be important for drivers - especially visitors to an area - to be able to easily and rapidly locate charging bays. We suggest some kind of standard "flag" be used on the chargers. (This could be coordinated with something similar, but different, to mark micromobility bays. Or, even better, we could have an integrated approach to discoverability of all kerbside services, as part of a general kerbside strategy.) Discoverability would be assisted by having chargers on carriageway, as they will be more visible and less likely to be obscured by parked/charging cars.

### **Conclusion**

We support the goals of this scheme, which furthers sustainable transport and county transport policies. Our objection is to an implementation which undermines other county goals and policies. The presumption should be simple: where a

charger can go on the carriageway, it does, leaving the footway intact. That keeps faith with the Transport User Hierarchy and national and county guidance.

So we ask that this decision be deferred for officers to bring back plans that keep charging infrastructure on the carriageway. And we ask that this kind of spatial allocation be taken forward, in future, within the framework of a kerbside strategy.

### **Summary Table**

| <b>Issue</b>                         | <b>What the schemes do</b>                                                                                                                                                    | <b>Policy engaged</b>                                                                                         | <b>Grounds for objection</b>                                                                                                                                                                                                                                 |
|--------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Footway annexation                   | Almost all schemes take space from the footway to site charging infrastructure, rather than placing it on the carriageway.                                                    | LTCP Policy 1 (Transport User Hierarchy); Inclusive Mobility 4.2; Oxfordshire Walking Design Standards 2.2.1  | Walking and wheeling sit at the top of the hierarchy, private motor vehicles at the bottom. The carriageway is available in almost all cases, so there is no physical constraint requiring footway siting. Chargers should be on the carriageway.            |
| Reduced footway width                | Several schemes reduce footways below 2m, and in places below the 1m absolute minimum once cabinet depth and carriageway setback are counted. Kings Cross Rd is already 1.6m. | Inclusive Mobility 4.2 (2000mm normal minimum, 1000mm absolute minimum only where an obstacle is unavoidable) | The 1000mm minimum applies only where alternatives are not feasible. Here they are. Reducing footways below 2m is not consistent with Inclusive Mobility where the carriageway can take the infrastructure.                                                  |
| Equalities impact                    | New permanent footway obstructions on residential streets, with no published dimensions or impact assessment.                                                                 | Equality Act 2010, s.149 (public sector equality duty); Inclusive Mobility 1.4, 1.5.1                         | Reductions in footway space fall hardest on wheelchair and walker users, disabled people, people with buggies, older people, and blind and partially sighted people who navigate by the kerblines. OCC has not shown it has had due regard to these effects. |
| No cycle or micromobility provision  | Most locations have no public cycle parking, yet none is proposed. Space is committed to EV charging instead.                                                                 | LTCP Policy 33 (parking needs of all modes considered in line with the hierarchy)                             | Cycle parking should be prioritised over EV charging at locations lacking it. Micromobility bays, seating, planting, cycle hangars, car-club bays and loading have not been evaluated as alternative uses.                                                   |
| No kerbside strategy                 | Space is allocated scheme by scheme, with no framework to weigh competing uses. The infrastructure is effectively permanent.                                                  | LTCP Policy 33; Street Design Code (vision-led approach)                                                      | With no kerbside strategy there is no coherent way to prioritise uses. Once installed, this space cannot easily be reassigned.                                                                                                                               |
| Inconsistency with council decisions | Footway obstruction is proposed weeks after a council motion against pavement parking, and after Frenchay Rd was sent back to keep space off the footway.                     | OCC pavement parking motion; Frenchay Rd precedent                                                            | The council has recently resolved to protect footway space. These schemes cut against that direction of travel.                                                                                                                                              |

|                       |                                                                                                                     |   |                                                                                                                      |
|-----------------------|---------------------------------------------------------------------------------------------------------------------|---|----------------------------------------------------------------------------------------------------------------------|
| Rules restricting use | Charging bays inside CPZs are not consistently restricted to permit holders; restrictions vary widely between bays. | — | Unrestricted bays in CPZs will attract commuter parking. Inconsistent rules will confuse users, especially visitors. |
|-----------------------|---------------------------------------------------------------------------------------------------------------------|---|----------------------------------------------------------------------------------------------------------------------|

## Comments on Specific Schemes - Oxford

### **Binsey Lane - OBJECT**

While there are no homes directly on this stretch of road, there is a need for cycle parking to serve the nearby homes on Botley Rd, since provision on Botley Rd itself is difficult, and the businesses on the other side, which lack adequate cycle parking. So the southernmost of the four bays here should be used to provide cycle parking rather than for EV charging. This would also be a good location for a micromobility bay.

The footway here appears to be about 2.75m wide and there are no entrances to homes and thus no concerns about bins. If the envelope of the chargers and their spacing from the carriageway will fit in under 0.75m then putting the chargers onto the footway here may be acceptable, but there is no obvious reason they can't go on the carriageway.

### **Cowley Rd - OBJECT**

One of these four bays should be allocated to cycle parking, given the lack of public cycle parking in the area.

The footway here appears to be three metres wide. That might allow installation of chargers without compromising walking and wheeling - leaving a clear 2 metres - assuming the chargers fit into one metre. But, although it is not authorised, people cycle on the footway here, especially with children, to get between Bartlemas Close and Belvedere Rd, since the latter lacks active travel permeability at its northern end. That would suggest the full width of the current footway is needed for active travel.

These bays need to be restricted to CPZ permit holders. Otherwise they will be used as commuter parking.

### **Cuddesdon Way - OBJECT**

There is no public cycle parking here, so one of the six bays should be used to provide that.

The footway here is 2.4m wide, and it seems unlikely chargers and spacing to the carriageway will fit into 0.4m, so the chargers need to go on the carriageway.

### **Hockmore St - OBJECT**

There is no cycle parking here, so one of the four bays should be used to provide that instead.

The footway here is just 2 metres wide, so the chargers must be put on the carriageway, not on the footway. The southernmost proposed bay is too close (for safety) to the bend in the road.

The restriction to CS permit holders needs to apply on Sundays as well, otherwise this will be used for general parking by people visiting the shopping centre on Sundays.

### **Kings Cross Rd - OBJECT**

There is no cycle parking nearby, so one of these bays should be used to provide that.

The footway here is only 1.6m wide, so any charging infrastructure must be located on the carriageway. (See photo above.)

### **Latimer Rd - OBJECT**

There is no public cycle parking nearby, so one of the six bays should be used to provide that. This would also be a good location for a micromobility bay, to serve the care home and the blocks of flats.

The chargers should be on the carriageway.

### **Salter Close - CONCERNS**

There is no public cycle parking on Salter Close, so one of these bays should be used to provide that. This might also be a good location for a micromobility bay, though a location closer to the school would be better if one is available.

The chargers here are on a grass verge, so there are no concerns about footway obstruction.

### **Water Eaton Rd - OBJECT**

There is no public cycle parking nearby, so some of this space should be used to provide that.

The diagram provided shows the footway as 4.5m wide here, but the measurement includes a vegetated area at the front of the property. The footway here is actually only 2.1m wide allowing for the vegetation. The chargers should be located on the carriageway, not the footway.

## **Comments on Specific Schemes - County**

### **Deddington, Bull Ring - OBJECT**

This area is a key destination both for shops and services and for access to buses, but is poorly provided with cycle parking. So some of the space proposed here for EV charging bays should be considered for cycle parking.

While these parking bays are right-angle bays in a car park, there is a footway behind them which is on a desire line for people walking between the Victoria Terrace area and Church St and that footway appears to be well under two metres. So the chargers here should not go onto that footway, but be located on the “carriageway” of the car park - there seems to be quite a lot of space.

### **Kidlington, The Phelps - SUPPORT**

The chargers appear to be on the carriageway!

### **Berinsfield, Green Furlong - SUPPORT**

The footway appears to be only 1.4m wide, but the chargers appear to be on the carriageway, inside the existing parking bays. If the latter is the case then we support this, otherwise we object.

### **Henley-on-Thames, Clements Road - OBJECT**

The footway is narrow and there is plenty of room to put the chargers on the carriageway.

### **Shrivenham, High Street - OBJECT**

The chargers should be on the carriageway.

### **Bampton, Market Square - OBJECT**

While the parking bays here back onto a very wide pedestrian area, that is a prime piece of public realm. EV chargers should not intrude onto that. Consideration should be given to pedestrianising more of this area, if not the entire Market.

### **Burford, Barns Lane - SUPPORT**

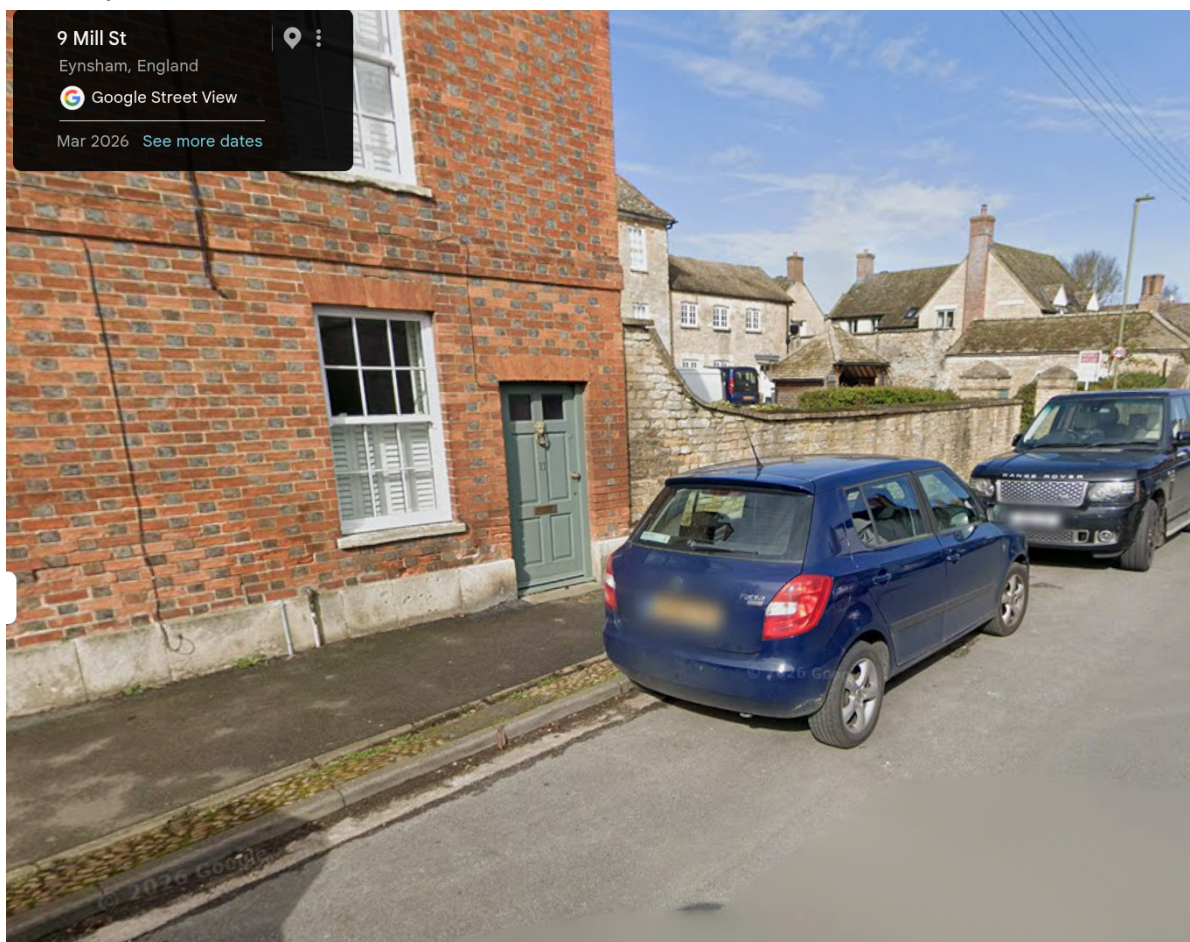
There is no footway involved.

### **Carterton, Hill View - OBJECT**

The footway is already under 2m wide.

### **Eynsham, Mill Street - OBJECT**

The footway here appears to be quite narrow and any intrusion by chargers would be unacceptable.



## **Witney, Church Green - SUPPORT**

The charging points and feeder pillar are going on a grass verge, so will not obstruct a footway.