



EEH Business Unit
c/o Buckinghamshire Council
Walton Street
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Date: February 2025

Dear Sir/Madam

Consultation: Phasing out sales of new petrol and diesel cars from 2030 and supporting the ZEV transition

England's Economic Heartland is the sub-national transport body stretching from Swindon across to Cambridgeshire and Northamptonshire down to Hertfordshire, including the entirety of the Oxford-Cambridge Growth Corridor. Supporting the transition to zero emission vehicles is a key policy in our regional transport strategy and our work on this has informed the technical response below.

Question 1: Do you agree with the Government's view that full hybrid and plug-in hybrid technologies only should be considered? Please explain your answer.

- Yes – In considering our answer we are reflecting that the EEH region is polycentric and rural in nature. Density is low outside of the large conurbations, meaning that public transport, particularly in rural areas is (without direct subsidy or cross subsidisation from more profitable routes) are often not considered viable. The fragmented nature of public transport provision has led to EEH being a high car dependency region.
- EEH is therefore committed to supporting the rapid deployment of electric vehicles, alongside investment into public transport and better land use planning and reducing the need for some trips.
- Whilst EEH are cautious regarding the efficacy of PHEV technology to enable a consequential reduction in vehicle emissions (OEM reported emissions are often significantly underestimated and do not reflect real world behaviour of users) we are supportive of a mandate to deliver longer-range plug-in hybrid vehicles to support vehicle owners to make the change to electric vehicles as technologies evolve.

- As a largely car dependent region, EEH supports a short-term moderate CO2 cap while more work is done to enable a shift to a fully electric vehicle park and enhanced public transport services.
- PHEVs have a role to play in the transition to net zero, giving car dependent users flexibility to adapt to the change in technology. However, EEH strongly support enabling the accelerated uptake of pure electric vehicles in all parts of the UK through further well-designed funding allocated to authority partners.
- The more rapid the transition to all electric vehicles is - the less CO2 will be emitted, therefore the transition to pure EV must be a priority.
- Whilst electric vehicles are part of the solution to the decarbonisation of transport, any funding allocated should also align with supporting comprehensive accessible public and active transport options that suit a range of users.

Question 8: What are your views on current measures to support demand for zero emission vehicles?

- The EEH region has benefitted from innovation funding for trials (See Milton Keynes and Oxfordshire specifically) for the deployment of innovative approaches to deploying and funding infrastructure enabling the uptake of EVs and, direct government funding from OZEV via the LEVI scheme. In addition, LAs have had support from EEH through our work in providing data and tools to enable evidence-based strategy development.
- Funding schemes have not always been optimal: Whilst very welcome, the pace of the schemes and timeframes for delivery have been difficult for some authorities to manage as they build skills in this area. Feedback from authorities highlights the need for further support with understanding wider OZEV strategies, how to best use LEVI funding, and the optimal approach to monitoring the success of the projects.
- The implementation of Zero and Low Emissions Zones, supporting zero emission vehicle uptake, is time consuming and challenging to deliver at a local level. Where appropriate DfT should provide support and guidance to authority partners to enable the rapid deployment of such interventions.

What additional measures could further support the transition?

- Authority partners have reflected that engaging with power distribution companies (DNOs) is difficult. They report (anecdotally) that there is not enough capacity in the power distribution system to support the increasing transport energy demand alongside the additional power requirement to decarbonise domestic heating. More support is needed to ensure the region(s) can prepare and improve strategic planning for power and transport. The development of the RESPs and LEAPs will help with this work but many authorities require further support.
- Purchasing a used low emission vehicle is a more affordable than buying new. Providing targeted support via grants to ensure an equitable transition would be welcomed.



- A scrappage scheme targeting the most polluting vehicles, would support people switching to EVs. This could be targeted at those living in rural localities where public transport is poor and there are few alternatives to the private car.
- Guidance and support should be formalised for more practical lower-cost interventions (such as Gullies) equipping all LAs to address challenges with delivering on street charging infrastructure.
- EEH and other STBs have produced robust data led tools and research highlighting current and future EV and EV infrastructure demand. These tools are free to access – we strongly recommend that OZEV/DfT focus on enhancing the STB tool kit – and fund future enhancements. This leads to a standardisation of tools and data available for LAs, reducing confusion and replication.

Question 4: Should a minimum range be required for new PHEVs and, if so, at what level should it be set? Please explain your answer.

- There should be a minimum range for new PHEVs.
 - About 50% of transport carbon emissions (~6.3MtCo2e) in the EEH region (from private vehicles) result from trips 10-50 miles. Motorists must be able to undertake these trips using a PHEV on full electric mode.
- EEH's evidence base identifies emissions specifically from Commute and business trips. Business trips (private Vehicles) over 10 - 50 miles account for 1.37 MtO2e.
 - Commute trips 10-50 miles account for ~13% (single leg) - 1 MtCO2e
 - Commute trips over 25 miles account for ~5% 0.11 MtCo2e
- At present - PHEV and EV uptake is largely driven by the fleet operators and business due to the tax benefits offered for procuring a PHEV/EV.
- These factors and vehicle utilisation patterns identify the clear need for PHEVs with a full electric range of <50 miles. This will only achieve the desired outcomes IF we continue to accelerate the delivery of good quality competitively priced charging infrastructure.
- Our region will see significant reductions in emissions if a minimum range is mandated. Such a mandate must be delivered alongside a well-funded program of Behaviour Change to ensure that PHEV owners utilise the battery mode wherever possible. PHEVs (of any range) should be considered a transitionary technology.
- Despite a signalled move to 'Decide and Provide' or vision led planning in recent planning reform documents, DfT are still expecting an increase in VKM out to 2050. It is imperative that government enable residents to make low carbon choices.

Question 6: What are your views on establishing a CO₂ requirement for vans from 2030? What is your preferred measure, if any, and at what level should the target be set? Please explain your answer.



- DfT have forecasted that van V-KM is set to increase by ~17% (2019-2030) in the region. This is an increase from 16% to 18.5% of trips in the region. Despite this increase in V-KM, emissions from vans is set to fall from 2.01 MtCO₂e in 2019 to 1.86 MtCO₂e in 2030.
- This is clearly a positive trend; however, more could be done to accelerate the uptake of EV and PHEV vans, particularly through the provision of suitable charging infrastructure.

EEH officers will continue to engage with and where possible support DfT and OZEV in the delivery of policy and programmes to that support transport decarbonisation. We look forward to working with your teams going forward – please don't hesitate to contact EEH officers for further discussions or, for access to the data that we hold.

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Head of Decarbonisation & Innovation

England's Economic Heartland

