



HOUSE OF COMMONS

LONDON SW1A 0AA

Consultation on ZEV Mandate
Department for Transport
Great Minster House
33 Horseferry Road
London
SW1P 4DR

Our reference: BS27185

24 May 2023

Dear Sir/Madam,

Re: Response to the Department for Transport's consultation on a zero emission vehicle (ZEV) mandate and CO2 emissions regulation for new cars and vans in the UK

I write as the MP for Runnymede and Weybridge in response to the Department for Transport's above-referenced consultation.

The UK's zero emissions vehicle policy is a vital component of the UK's strategy for achieving its overarching net zero commitments. This policy is of international and national importance, but also has specific ramifications for constituents of Runnymede and Weybridge.

Tackling air pollution locally is very important. Both the M3 and M25 run through my constituency, and Surrey County Council has stated that road usage in Surrey is 66% above the national average. Local NHS services see the negative impact this has on the health of my constituents. I believe that one of the best ways to tackle air pollution and improve the health of the local population and people across the UK is by reducing the use of vehicles propelled by internal combustion engines through a robust ZEV mandate.

In Runnymede and Weybridge, we are proud to be home to a range of high-tech companies. Notably we are home to Octopus EV and several Tesla sites. Last year I attended an event organised by the APPG for the Environment at Octopus EV where I met with many innovators and start-ups operating in this space. At this event and subsequently, I have received a range of representations from businesses working in the sector calling for a strong and ambitious ZEV mandate.

Government standard-setting and backing is essential to expedite transition to ZEV ownership and to demonstrate support for the industry which will attract investment. This will improve consumer choice and help to make ZEV ownership more realistic from a cost and availability perspective.

Trading, banking and borrowing allowances

Feedback I have received from industry stakeholders has not been favourable towards banking, borrowing or trading of emissions allowances due to the perceived risk of delaying progress towards full transition to ZEV sales.

However, as referenced in the consultation, I recognise that some manufacturers may face challenges in producing sufficient ZEVs to meet targets in the initial years. Therefore, a pragmatic approach is required which gives manufacturers the flexibility in the shorter term to plan their transition. Through this we can set ambitious targets while supporting companies and the market, leading to a cleaner and more prosperous sector.

Any trading, banking and borrowing practices should remain in place for the shortest

necessary period to facilitate an expeditious transition to increased ZEV production in line with the consultation's timeframes. The proposed plan for banking and borrowing of allowances/credits is time-limited. I would also strongly encourage consideration of time-limiting the allowance trading scheme which currently appears to be open ended until 100% ZEV sales comes into effect in 2035. This should end with the cessation of new petrol and diesel car sales in 2030 at the very latest.

Use of credits to incentivise positive conduct

While I believe we need to avoid loopholes that enable manufacturers to postpone their progress towards increased ZEV production, I support the value of promoting conduct which has additional social or environmental benefits, such as the proposed credits scheme for cars sold into car clubs which will help to reduce overall car ownership.

Consideration should also be given to whether credits could be used to incentivise manufacturers to offer scrappage schemes, where drivers can part exchange older, polluting vehicles for a ZEV or significant zero emissions capability vehicles. This will help to expedite the process of getting the dirtiest vehicles off our roads as quickly as possible.

Local planning and infrastructure

The Government's ambitious ZEV mandate must of course be facilitated by the necessary charging infrastructure. I welcome the measures that the Government has already announced to support the widespread rolling out of ZEV charging points, so that access is not a barrier to ZEV car ownership.

So far, Government funding, alongside private sector investment, has supported the installation of more than 30,000 public electric vehicle charging devices, including over 5,400 rapid devices - one of the largest networks in Europe. The Government has also stated that it intends to install 300,000 public EV charging points by 2030.

However, more work that needs to be done in the shorter-term to ensure that ZEV ownership can be a practical reality for most people. As an area with relatively high housing density, many Runnymede and Weybridge residents live in flats or housing without private driveways and will not have the option of charging their vehicles from mains supplies. Therefore, ready access to sufficient public charging points is essential, including additional measures to encourage employers to install charging points at places of work.

As such, I am strongly supportive of the Government's Local EV Infrastructure Fund which will support local authorities, working with industry, to deliver charging points for drivers without off-street parking.

The Government's National Planning Policy Guidance already specifies that local parking standards for residential and non-residential development should take into account the need to ensure an adequate provision of spaces for charging plug-in and other ultra-low emission vehicles. I welcome the Government's confirmation that it will now go further, and legislate to mandate the installation of electric vehicle chargers to all new homes and buildings - as well as those undergoing major renovation.

The commitments that the Government has announced on charging infrastructure will be essential in supporting the proposed minimum ZEV target trajectory for new cars sold, starting at 22% in 2024, increasing to 80% in 2030 reaching 100% in 2035.

Supporting car clubs

Car clubs support transport decarbonisation by reducing car ownership, introducing cleaner vehicles onto our roads and encouraging active travel. I am aware that Surrey County Council is working with Enterprise Car Club to expand car club provision county-wide. Runnymede and Weybridge already benefits from the availability of Enterprise Car Club cars in Addlestone, with a further car club to be introduced in Egham.

Expanded use of car clubs will not only be beneficial for the environment; shared car ownership will also assist in alleviating congestion in residential parking, which is an issue in

many parts of the constituency. Car clubs have the potential to reduce traffic, as use is charged on a timed basis, and therefore drivers tend to be more sensitive to the frequency and length of their journeys and are less likely to travel by car for unnecessary trips.

I therefore strongly support additional incentives to manufacturers for ZEVs sold for use by car clubs. Consideration should also be given to providing guidance to councils on how to promote and support car clubs, including dedicated parking bays with appropriate signage and charging points.

Implications of proposed ZEV mandate for Ultra Low Emissions Zone expansion

I have been, and continue to be, an outspoken critic of the Mayor of London's ill-conceived expansion of the Ultra Low Emissions Zone to encompass outer-London boroughs. Not only will this disproportionately impact those on lower incomes, but the Mayor's own independent impact assessment shows that this policy will have negligible effects on air quality.

I have called on the Mayor to scrap ULEZ expansion and instead focus on measures which will lead to significant improvement in air quality without the financial implications for residents. One such measure is working with the Government to implement an ambitious ZEV mandate, in tandem with expanding the car scrappage scheme, to support those in outer London boroughs with their transition to ZEV ownership.

In contrast to the evidence on ULEZ expansion, scientific studies relating to increased ZEV use in California have indicated that the consequent improvement in air quality leads to better health outcomes. I therefore welcome the Government's ambitious timescale for phasing out the sale of new petrol and diesel cars, and I hope that the Mayor will reconsider his position on ULEZ expansion in the light of this policy.

Please do not hesitate to contact me if you require any further information on the issues addressed in this response.

Yours faithfully,



Dr Ben Spencer MP
Runnymede and Weybridge