Zero emission vehicle mandate review [WELSH EXAMPLE]

Your information

Q1. What is your full name?
[redacted]

Q2. What is your email address?
travel@transitiontavistock.org.uk

Q3. Are you responding on behalf of an organisation?
Yes

Organisation details

Q4. What is the full name of your organisation?
Transition Tavistock

Q5. How many people's view does your response represent?
Up to 20 people

Car targets

Q6. Do you think any change is required to the current ZEV Mandate trajectory for cars?
No

Q7. Explain your answer including any supporting evidence.
Comments: Any change to the headline target risks stalling the momentum of a vital transition which is finally spreading to rural areas. Observation of cars seen on roads and in car parks in the west Devon market town where we are based suggests that, while EV take up in this rural area was slow compared other parts of England, it is now taking off. More of the hospitality and attraction venues in Devon and Cornwall are investing in provision of public or customer charge points. More local independent motor repair businesses are investing in training staff to handle EVs. Local authorities have taken steps to enable provision of chargepoints at public and community car parks, but will need to continue to give this attention given the size and spread of the rural road network. As a volunteer-run group, engaged in encouraging sustainable transport among other environmental objectives, we have been doing our bit to encourage drivers to switch to EVs, and signposting reliable information about their options. These trends are all fragile, and any signal that moving to ZEVs is either unnecessary or impractical risk reversing all of them. Small businesses and households are more likely to get their impression of national direction and intention from headline messages than from finer details of policy documents.

Further car target reasoning

Q8. Overall, what, if any, are your views on the current ZEV Mandate car trajectory and the 4 alternative car trajectories presented and why (including any evidence)?

Comments:
We are concerned that any alternative to the current mandate will be interpreted as a weakening of government commitment both to the transition to ZEVs and to action on climate change more widely. This risks discouraging individuals and businesses weighing up the implications of their own decisions, and empowering voices opposed to climate action.
We know that people in our area are concerned about climate change. For example, we recently hosted a showing of the People's Emergency Briefing film on a weekday afternoon - a time and venue when we would normally see 20 as good attendance. The 60 places were fully booked a week ahead, attracting a wide range of people including parents of young children.
As cogently illustrated in "Clearing the Air" by Hannah Ritchie (the current title in an book group which is another of our regular activities), misplaced concern about aspects of EV production and use is a factor deterring some potential, well-intentioned, car buyers.

Q9. Which trajectory, if any, is your preference?

Current mandate (baseline)

Q10. What, if any, additional alternative car trajectories would you like to be considered and why (including any evidence)?

Comments:
As above, public confidence impact will be from headline, not a nuanced argument about flexibilities.

Van targets

Q12. Do you think any change is required to the current ZEV Mandate trajectory for vans?

No

Q13. Explain your reasoning including any supporting evidence

Comments:
Take up of ZEV vans appears to be slow in Devon, for understandable reasons given the distances small businesses cover and the still limited spread of rapid chargers in rural areas. However the lower running costs would be a significant benefit to the business, and the emissions reduction significant to the community, given the high mileage. Maintaining the mandate will give manufacturers and retailers an incentive to help purchasers take this significant decision.

Further van target reasoning

Q15. Which trajectory, if any, is your preference?

Current mandate (baseline)

CO2 conversion flexibility

Q19. What are your views, if any, on whether the flexibility should remain capped?

Don't know

Eligibility criteria

Q26. Do you agree or disagree that the eligibility criteria for the relevant conversion and bid irectional trading flexibilities should be amended?

Disagree

Q27. Explain your answer including any supporting evidence.

Comments:
Sounds too like an incentive to focus on presentation rather than substance.

Vehicle to grid and vehicle to home (V2G/V2H) credits

Q28. What are your views, if any, on whether the UK and devolved governments should intr oduce a new vehicle to grid/vehicle to home credit?

Don't know

Technical requirements

Q30. What, if any, are your views on our proposed approach to technical eligibility criteria a nd why (including any supporting evidence)?

Comments:
For consumer confidence all those points, particularly time assurance on continued functionality after sale, would be important. West Devon has a higher than national average number of elderly residents, most of whom still drive (and need to, given lack of bus services). We are aware that some of them find the level of digital interface / screen use in new cars worrying. (Much of it is also in new petrol cars, but it is perceived as more of an EV problem.)

AC and DC

Q33. What are your views, if any, on whether the value of a V2G/V2H credit should differ b etween Alternating Current (AC) and Direct Current (DC) capable vehicles?

Don't know

Additional credits

Q35. What additional credits, if any, do you think should be considered within VETS for car s (including any supporting evidence)?

Comments:
Given the existing inequity in ownership of EVs, and the continuing inequity in access to charging at home electricity rates between residents in different property types, any incentive geared to social value is welcome.

Q36. What additional credits, if any, do you think should be considered within VETS for van s (including any supporting evidence)?

Comments:
Looking to the future, there will be an increasing number of volunteer drivers, eg those who drive minibuses for clubs or charities, who have not driven an ICE vehicle of their own for many years - eventually, not at all. Measures to help that sector transition as fast as it feels able to would therefore be valuable.

Compliance payments

Q37. What are your views, if any, on whether compliance payments should remain at curre nt levels?

Agree

Q38. Explain your answer including any supporting evidence.

Comments:
If anything, should increase, given the increasing visibility of the economic cost of increased severe weather and the role of climate change in that.

Non-ZEV CO2 baselines

Q39. What are your views, if any, on whether to amend the way baselines are determined f or manufacturers who enter the UK market in and after 2027?

Don't know

PHEVs

Q42. In your view, how, if at all, can the UK and devolved governments encourage electric vehicle (EV) driving among plug-in hybrid electric vehicle (PHEV) users and support chargi ng behaviours (including evidence)?

Comments:
Get imaginative - don't make it a formal government message. Work it into the plot of some soap operas.

Q43. What are your views on whether the alternative PHEV CO2 flexibility should continue beyond 2030?

The flexibility should end in 2030

Q44. Explain your answer including any supporting evidence.

Comments:
The consultation paper itself points out that PHEVs are not, in practice, aiding the energy transition. We are aware through our conversations, eg at stalls at events in our Devon market town, that some people who want to move away from using just petrol are confused about the various types of "hybrid" on offer, and about what a PHEV is. The disadvantages of PHEVs (which we sometimes summarise as "moving two different sets of heavy equipment round with you") are not well known.

Demand

Q49. What are your views, if any, on whether the current measures to support EV uptake ar e effective? Explain your answer, including any supporting evidence

Comments:
Company fleet incentives are useful nationally and in resourcing the second hand market, but less relevant to the rural economy. Charging infrastructure is the most important, and has seen improvement, but there is a long way to go before every village has access.

Q50. What additional measures, if any, should be introduced to support more rapid EV upta ke? Please explain your answer including any supporting evidence

Comments:
We support the policy priorities advocated by EVA England. Of particular relevance to West Devon are these. (Comment in brackets).
Reduce VAT on public charging points in line with the 5% rate on domestic electricity supply; and ensure bringing down the cost of EV charging is central to wider reform to tackle electricity pricing. (For the substantial minority of homes in market towns and villages which lack off-street parking, there is limited choice of public chargepoints close to home.)
Restructure and extend the workplace charging scheme to make it available to a greater number of state-funded institutions (e.g. schools, NHS sites) and more affordable for small and medium-sized companies, so that more people can access affordable, slower charging options away from home. (This type of workplace is typical of the local economy.)
Encourage the industry to consider options that reduce public charging costs for residents, for example, through dynamic pricing, which makes it cheaper to charge at certain times of day. (With a higher than average proportion of the population retired or working from home, this benefit is already available to those with a chargepoint at home.)

Other legislative amendments

Q53. Do you agree or disagree that fewer Certificates of Conformity should be requested?

Don't know

Pool baselines

Q63. What are your views, if any, on whether it would be preferable to weight pool baselines based on registrations in the scheme year for which the pool is formed?
Don't know

Car club credits

Q65. What are your views, if any, on the current design of car club credits and why (including evidence)?
Comments: No direct experience of this, but we think encouraging car clubs is important.

2030 technological definition

Q68. Do you agree or disagree with our proposal to require all new non-plug-in hybrid cars sold from 2030 to meet the UNECE NOVC-HEV Category 2 definition?
Agree

Treatment of micro and small volume manufacturers post 2030

Q74. Do you agree or disagree with our proposed non-ZEV fleet-wide average CO2 reduction requirement for SVMs that produce cars post-2030? This would see a 10% reduction compared to their baseline.
Don't know

Setting bespoke derogations

Q76. Do you agree or disagree with our proposed approach to setting derogations from the CO2 reduction requirement for SVMs that produce cars post-2030?
Don't know