



Chartered Institution of Highways and Transportation

Department for Transport Consultation

**A zero emission vehicle (ZEV) mandate
and CO₂ emissions regulation for new
cars and vans in the UK**

May 2023

For any inquiries, please email technical@ciht.org.uk

Question 1:

(a) Do you agree or disagree with the UK Government's preference to introduce a UK wide regulatory framework?

(b) Or, do you agree or disagree with the introduction of different trading schemes with separate requirements in one or more of the nations, different from the rest of the UK?

Please explain your answer.

We agree with the UK Government's preference to introduce a UK-wide regulatory framework, however, we believe there are additional points that need to be considered.

The Chartered Institution of Highways & Transportation (CIHT) is a strong advocate for the development of a [National Transport Strategy](#)¹ that sets out how transport will contribute to key policy areas.

However, without an overarching National Transport Strategy (of which the proposed ZEV mandate would be part of), the transport sector will remain disjointed and lack coordination. The proposed ZEV mandate is a clear example of how a new transport policy, whilst having individual merits, will not be successful unless it is coordinated with other activities, in this case the roll out of electric vehicle (EV) charging infrastructure. The mandate alone is unlikely to achieve the outcomes sought by government without a stronger linkage to plans to support the growth of the UK's network of charging infrastructure.

In this context, we note that although the 'ZEV umbrella' covers both hydrogen fuel cell vehicles and electric vehicles, there are far more electric vehicles on the road in the UK. Using the Government's own [vehicle licensing statistics data tables](#),² in September 2022, in the UK there were:

- 547,423 registered battery electric vehicles.
- 183 registered hydrogen fuel cell vehicles.

This suggests that as manufactures attempt to meet the proposed ZEV mandate, it will be largely new electric vehicles that we see entering the market. The success of the ZEV mandate will therefore in practice rest on an expansion of electric vehicle charging infrastructure, particularly public charge points.

This view is in line with the findings of a CIHT expert workshop on [EV charging site selection](#)³ held earlier this year which concluded that *the regulatory framework needs to better support the roll-out of charging infrastructure.*

Question 14: What are your views on the proposed methodology to set baseline CO₂ emissions targets for manufacturers?

CIHT recognises the impact of vehicle emissions on air quality; we support sustainable transportation practices and efforts to reduce their impact on the environment and human

¹ [CIHT calls for Government to develop an overarching National Transport Strategy](#), 7 February 2022.

² VEH0133, accessed on 15 May 2023.

³ [Where to put public electric vehicle charge points?](#) 8 March 2023.

health. We welcome any scenario that ensures the emissions produced by new non-ZEVs being sold do not reverse the benefits of increasing the number of ZEVs on the road.

Question 24: Do you support or oppose the proposal to keep the regulation under review?

Yes, CIHT supports the principle that any new regulation should be kept under review to ensure that it is meeting its intended objectives. We propose that one of these objectives should be that the ZEV mandate is not creating an imbalance between the number of EVs on the road and the number of public chargepoints that serve these EVs.

We believe the ZEV mandate should be revised if it is found that it is causing significant pressure on our existing charging infrastructure. This revision should then incentivise the creation of infrastructure to match the minimum % of ZEVs being sold at the time.

Question 25: What are your views on the potential impact of the two proposed schemes on communities in the more rural and remote parts of the UK and to those businesses involved in the sale of vehicles in those areas?

At our workshop on [EV chargepoint site selection](#)⁴ a common message was repeated throughout discussions around regional disparities across the country. New products and innovations are constantly being produced to try to solve the problem of public charging, such as the use of pop-up chargers and gullies. However, without evidence that these solutions work, many budget constrained local authorities will be hesitant to embrace them. Similarly, some rural or less-wealthy areas are not as likely to be considered for testing trials by private sector providers and risk being left behind when it comes to developing EV charging infrastructure.

These problems will only be intensified as more EVs enter our roads due to the ZEV mandate. We would like to see the Government bring forward measures (i.e. guidance and frameworks) to enable local authorities to provide the necessary public charging infrastructure to keep up with the increasing levels of EVs.

⁴ [Where to put public electric vehicle charge points?](#) 8 March 2023.