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

### **About Us**

Consumer Scotland is the statutory body for consumers in Scotland. Established by the Consumer Scotland Act 2020, we are accountable to the Scottish Parliament. The Act defines consumers as individuals and small businesses.

Our purpose is to improve outcomes for current and future consumers, and our strategic objectives are:

- To enhance understanding and awareness of consumer issues by strengthening the evidence base
- To serve the needs and aspirations of current and future consumers by inspiring and influencing the public, private and third sectors
- To enable the active participation of consumers in a fairer economy by improving access to information and support

Our 2023-2027 Strategic Plan sets out a particular focus on three cross-cutting consumer challenges: affordability, climate change mitigation and adaptation, and consumers in vulnerable circumstances. All three areas are directly relevant to policy on the adoption of EVs.

We use data, research and analysis to inform our work on the key issues facing consumers in Scotland. In conjunction with that evidence base we seek a consumer perspective through the application of the consumer principles of access, choice, safety, information, fairness, representation, and redress. We assess that the principles of access, information and fairness are relevant to this consultation, and our response also draws on findings from our own research into the experience of EV drivers in Scotland

## Overview

Consumer Scotland welcomes the opportunity to respond to the UK Government's consultation on the phasing out of sales of new petrol and diesel cars from 2030, and supporting the ZEV transition.

Consumer Scotland's view is that for the transition from petrol and diesel to ZEV cars to be achieved successfully, it is necessary to improve the consumer experience of owning and operating electric vehicles. Our response to the consultation is therefore limited to:

**Question 8: What are your views on current measures to support demand for zero emission vehicles? What additional measures could further support the transition?**

## Response

In 2024 Consumer Scotland undertook and [published](#) research on EV adoption in Scotland, drawing on the experience both of current EV drivers and those considering purchasing an EV in future. We subsequently engaged with a range of stakeholders across the transport, electricity and local and Scottish Government sectors, and are now working with Transport Scotland to develop a longer-term stakeholder group to better inform future work, particularly on the charging network.

Based on the above, we consider that the aspiration to phase out the sale and use of petrol and diesel cars will only be achieved if consumers have a positive experience of EVs across all aspects of the customer journey – purchasing, driving experience, cost and convenience of charging and servicing, and more.

We also consider that it is important that EVs are accessible to, and a viable option for, all drivers if the transition is to be successful.

Our response to the consultation question is therefore that current measures do not go far enough to support demand for EVs, and that additional measures are needed to further support the transition through increasing consumer confidence.

We provide details on these below, and would welcome the opportunity to discuss these issues.

Yours sincerely,



Eleanor Mullan

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## Appendix: Summary of Consumer Scotland EV Driver Research

### Overview of Research Findings

Our research with EV drivers found that they are very positive about their vehicles - 87% of our EV drivers reported would purchase an EV in the future. A lower proportion (47%) reported that they would only buy EVs in the future, while 41% reported that they would consider both EV and ICE engines for future purchases.

Amongst drivers who have not yet made the move to EVs, there are much higher levels of scepticism about driving EVs in the future. Recent [Which?](#) research found that only 6% of non-EV drivers would consider buying an EV as their next vehicle, and that the proportion of non-EV drivers saying they are unwilling to purchase an electric vehicle almost doubled between June 2021 (20%) and June 2024 (39%).

These findings support our position that more needs to be done to improve consumer confidence around EVs.

### Public charging infrastructure that supports those unable to charge at home

Our research found a distinct difference in experience between those able to charge at home and those reliant on the public charging network. 80% of our EV drivers were able to charge using their residential supply, with 73% using a charging point attached to their house, indicating access to a driveway. Our research also found that at home charging was a central part of the attraction of EV ownership:

“[No at-home charging is] a total deal breaker. No home charging and we would not have our EVs.” (Survey response)

EV drivers who tend to charge at home reported better experiences in relation to running costs than those who did not:

- 38% of those who do not tend to charge at home reported running costs were higher than expected, compared to 14%
- 33% of those who do not tend to charge at home reported concerns over running costs, compared to 11%

EV drivers also reported issues with both availability and reliability of public chargepoints. Around four in ten (39%) disagree there are typically enough charging points for them to use, and 46% disagree that they are typically in good working order. Three quarters of EV drivers (75%) reported having to choose a different charging point than the one they had originally intended to use at least once in the previous 12 months with the most common

reason for this being because it was out of order (73%). Overall, around half of EV drivers (51%) agreed they worry they will not be able to charge their vehicle when out and about.

According to the [Scottish House Condition Survey](#), around half of all households in Scotland live in circumstances where charging at home is likely to be difficult due to the lack of a driveway, including 37% in flats. The difference in experience between home and public charging risks producing future inequality as more people who cannot access at home charging transition to EVs.

We believe that support for accessible and affordable public charging infrastructure is especially needed in areas where housing type means that consumers are unlikely to be able to charge at home. In particular there is a requirement for slower kerbside chargers in urban areas, or other solutions that provide easy access to residents without charging facilities at home. Should this infrastructure not be provided at the scale and pace required, there is a risk that those who cannot charge at home will face significant barriers to EV adoption.

The unit cost of public charging is also a negative factor for consumers unable to charge at home, and this issue is likely to become more off-putting if the second-hand market develops as anticipated and more lower income drivers adopt EVs. Suitable solutions must be identified to make EVs more attractive to those unable to take advantage of the low running costs associated with charging at home.

### **Increased capacity to provide specialist servicing and repair**

EV drivers tend to own newer vehicles and have purchased them new – 70% of our EV drivers owned cars registered during 2021 or later. Despite this there are early indications of consumer concerns around the vehicle maintenance and repair infrastructure. Around one in five EV drivers report current dissatisfaction with ease of finding a technician and choice of technician for both servicing and repair. This rises to one in three (35%) reporting dissatisfaction with the length of time taken for repairs specifically, which is concerning given the young age of the fleet. EV drivers reported having to send their vehicles away in order to get necessary repairs completed:

“Manufacturers don't seem to have provided the where with all for garages to fix battery problems – mine went from Edinburgh to Newcastle and took 5 weeks.”

(Survey response – typing errors amended)

This early indication of capacity concerns could become more problematic as the current fleet ages and the number of EV drivers increases, putting more demand on the system. This is of particular concern as [previous research on consumer detriment](#) has identified vehicle maintenance and repair as a particular cause for concern, with 17% of UK adults that used this service (and 9% of the UK adult population) experiencing detriment, i.e. a problem or issue that caused stress, took time to resolve or cost money to fix or put right.

We believe that it is necessary to increase capacity of both dealerships and independent garages to provide specialist maintenance and repair services for EVs. Knowing these services are available, affordable and reliable will help provide confidence to buyers of used EVs.

### **Provision of more accurate information on the real-world range of EVs in the Scottish context**

While our research found that the vast majority of drivers (90%) were satisfied with the information they accessed in advance of making their purchase, this was primarily as a result of their own research. There was anecdotal evidence of some dissatisfaction with information from mainstream dealers:

“The dealer didn’t know much about the car and definitely about charging. He said I will pick it up as I go along.” (Focus Group 2 – rural)

The most significant information issue identified was the difference between advertised and real-world range, with around one third of drivers (34%) saying it was less than they had expected, and one quarter (25%) saying that maximum mileage had been overstated at purchase. Specific scenarios in which mileage dropped, such as motorway driving or cold weather, were also reported.

A positive finding from our research was that the proportion of drivers holding concerns around range dropped as they progressed throughout the consumer journey. Range / battery degradation was identified by 73% of those considering purchasing an EV as a concern, dropping to 50% when current EV drivers were asked to recall what concerns they had prior to purchasing their vehicle, and to 35% for the current concerns of EV drivers. This highlights the extent to which a lack of accurate information is impacting consumer confidence.

We believe that providing clearer, more accurate and easily accessible information on the real-world performance of EVs in Scotland, in advance of purchase, would help increase consumer confidence. Ideally this should be linked to existing information, support and advice provision, while dealerships should be supported to improve their advice provision