Supplementary evidence to the NZ,E&T Committee session on the draft CCP

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Introduction

This note constitutes supplementary information to my oral evidence given to the Net Zero, Energy and Transport Committee on Tuesday 16 December 2025 at its evidence session on the draft Climate Change Plan (38th Meeting, 2025, Session 6).

In alignment with the evidence session attended, the following note focuses on the content of the draft CCP in relation to its plans for accelerating the uptake of electric passenger cars. It is divided into six key areas as follows:

1. ***Lack of targeted focus on help to buy EVs***

There is currently a focus on increasing the affordability of EVs *in general*. However, **even *good* EV policy can be regressive if it mainly subsidises new car buyers with driveways. A targeted approach is needed to widen access** to EVs across all income levels and thus ensure the market maintains momentum over the next decade. This needs to involve identifying segments of the population and places that require targeted assistance. For instance:

- Those who are most 'transport vulnerable' and most impacted by rising fossil fuel costs – i.e. those who own a car, live in rural areas on the lowest income deciles or those who undertake high mileage for relatively low paid work regardless of where they live.
- Those without the ability to charge off-road at home.

Scotland is currently the only part of the UK offering financial support in the form of an interest free loan for consumers to purchase electric vehicles. However, this is not targeted or tiered by income. Moreover, the uptake of this scheme (i.e. who has benefited) is not being evaluated. This is a missed opportunity to have implemented something akin to France's social leasing scheme which offers low-to-middle-income

households affordable, subsidized monthly rentals for electric cars, typically for 3+ years, with low or no upfront costs. The leases can be tiered by income and proof can be also used to tie these leases to long commutes (>15 miles). France had 90k applicants in the first couple of weeks for its €100/month scheme.

2. Lack of deliberate support for the second-hand EV market

Each year, four times more used cars are sold than new cars. Therefore, the used-car market is where the 'mainstream' (and lower income) consumer resides. Motor manufacturers, retailers and financers rely on a healthy second-hand market to increase residual values as this is a determinant factor in fleet uptake where most (75% so far) BEVs are first purchased.

The draft CCP largely assumes a second-hand EV market will emerge but does not yet set out policies to actively enable it. Yet, **international experience shows that a strong second-hand EV market is not automatic but requires deliberate policy support**, particularly through procurement and fleet electrification, scrappage schemes, used-EV incentives, battery assurance and affordable finance. There are several initiatives that could be used:

- *Direct purchase incentives for used EVs*. These are still relatively rare but are growing quickly. E.g. France's "Bonus écologique" initially involved an income tested cash bonus for purchasing a used BEV (€1,000–€2,000). This was available regardless of whether the seller is a dealer or private individual and is explicitly framed as a social equity measure, not just a climate policy.
- *Scrappage schemes*. The Spain MOVES programme and France's Prime à la conversion" pays a bonus for scrapping an older ICE vehicle and replacing it with a new OR USED EV. Higher payments are made to low income households and higher mileage drivers. Other more local/ sub-national jurisdictions (i.e. in Germany) have also piloted Scrappage-for-used-EV schemes.
- *Public-backed guarantees for battery condition and resale value*. Japan has had long standing battery health reporting standards (initially for hybrids, now for EVs). The EU's new Battery Regulation will require battery passports and health and durability information but the UK, including Scotland, does not yet have a mandatory, industry-wide, standardized battery health certification scheme for used EVs.

Scotland has no equivalent devolved incentives like the second-hand purchase incentives or scrappage schemes outlined above, despite the equity rhetoric in the plan. **A targeted used-EV grant could align with fuel poverty and just transition aims**.

3. ***Lack of clarity on the assumptions behind EV uptake, utilisation and charging deployment to determine deliverability and emissions pathways***

The plan asks Parliament to accept ambitious emissions projections without specifying the principal demand-side EV measures needed to deliver them. Given the CCP's reported reliance on transport for a very large share of reductions, and the substantial forecasted financial benefits associated with the switch to EVs, there is a very concerning accountability issue: **the plan should provide policy-by-policy quantification or at least transparent assumptions behind EV uptake, use profiles and charging deployment**.

In particular, key delivery levers are *underspecified*—especially the "consumer incentives" package. If incentives are new but undefined, it is not possible to assess the expected uptake (new vs used EVs), fiscal cost, distributional impacts, or whether it closes the gap to the emissions pathway the plan assumes. Answers are needed to the following questions:

- What is the **defined EV uptake trajectory** assumed (by vehicle type) to deliver the transport emissions pathway?
- What is the **expected utilisation profile** of EVs and of the residual ICEs on the road to determine final fuel demand and emissions?
- How will the EV strategy be aligned with **car-km reduction / modal shift** to avoid rebound effects?
- What exactly are the **"consumer incentives"** (eligibility, scale, budget, start date, evaluation plan)?
- How are **rural, island, and tenement** charging needs handled, and who funds grid upgrades?
- What minimum standards will apply to **public charging** (coverage, reliability, accessibility, price transparency)?

In addition, on the calculation of benefits, there is reference to 'co-benefits' or 'wider impacts' in various sectors but it is not clear to what extent these are included in total benefits and if so what these are.

4. ***Lack of attention to travel patterns to prioritise the location of charging infrastructure***

Achieving an equitable and geographically accessible charging network will depend as much on policy intervention as on market-led rollout, particularly where those interventions shape both EV uptake and wider travel behaviour. The draft CCP pathways appear to assume a charging network that delivers broad accessibility across Scotland,

but they do not **make explicit how infrastructure planning will be linked to expected travel patterns**—i.e. where future vehicle miles will be undertaken, and what level of geographic coverage will be required to support them. Nor does the draft provide sufficient detail on how modal shift is expected to redistribute demand between electric motoring, bus use and active travel (for example, whether shorter sub-10km trips are primarily expected to transfer to walking and cycling, or whether a substantial share of 10–40km journeys will instead shift to public transport). Without a clearer articulation of which journeys will remain reliant on car travel—and where—there is limited basis to prioritise charging investment or to scrutinise whether the proposed charging network can credibly enable the emissions reductions claimed. This creates a practical "trilemma" for delivery, particularly in rural and remote areas: balancing total charger numbers, technology and service accessibility (including for those without home charging), and the geographic distribution needed to ensure reliability and fairness.

5. ***Slow and unclear effort to plan the roll out of residential charging infrastructure***

While the draft CCP recognises the importance of near-home charging, delivery still needs to be framed at the level of outcomes and pace required to make uptake equitable for households without off-street parking. **The CCP should move beyond aggregate chargepoint numbers and commit to targeted residential coverage standards**—e.g. a defined minimum level of reliable overnight charging access within a short walk of homes in high on-street-parking neighbourhoods, rural towns, and areas with high proportions of flats/tenements—supported by a transparent roll-out plan and reporting/monitoring.

International experience suggests this is achievable where governments and municipalities use explicit targeting and delivery mechanisms rather than relying on opportunistic deployment:

- *Demand-led-replacement*: the Netherlands has built a dense, reliable network in part through demand-led placement (installing kerbside chargers in response to demonstrated local need) and through coordinated regional concessions that pool municipal demand and reduce procurement friction.
- *Legal 'right-to-plug'*: France addressed governance barriers in multi-occupancy settings by adopting a legal "right to plug" concept for shared buildings, combined with the ADVENIR grant support programme that helps fund charging in shared buildings and parking contexts.

The CCP should therefore specify (i) how locations will be prioritised using travel/parking, vulnerability and housing data, (ii) the delivery model (for example,

regional concession frameworks led by councils/regions), and (iii) the affordability proposition for those without home charging, so that near-home provision actively closes—rather than perpetuates—the cost and convenience gap between driveway and non-driveway households.

6. *The role of local authorities is not set out*

A further gap in the draft CCP is that the role of local authorities in accelerating EV uptake is not consistently specified or clearly embedded as a delivery requirement. Given councils' central influence over the practical conditions for EV adoption—through local charging strategies, planning and consenting performance, parking and pricing levers, and the transition of public sector fleets—**the CCP would benefit from an explicit Local Government EV Delivery Framework annex**. This could define core responsibilities for councils alongside associated milestones, annual metrics and reporting expectations, enabling clearer accountability and more transparent scrutiny of progress.

A strong Scotland-specific comparator already exists in Transport Scotland's *EV Public Charging Network Implementation Plan*, which is structured as a multi-stakeholder delivery plan and repeatedly identifies local authorities as key delivery partners. The draft CCP could usefully lift this approach by setting out a concise action table for EV delivery, specifying (a) the lead partner (e.g. councils, Scottish Government, DNOs), (b) deadlines, (c) expected outputs (such as on-street chargers delivered or planning service standards achieved), and (d) measurable metrics—helping ensure that delivery responsibilities match the pace and scale of uptake assumed in the emissions pathway.

Jillian Anable, January 2026