

**Report to:** Partnership Board –Transport for the South East

**Date of meeting:** 19 March 2026

**By:** Chief Officer, Transport for the South East

**Title of report:** Responses to Consultations

**Purpose of report:** To agree the draft responses submitted in response to a consultation.

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***RECOMMENDATIONS:***

The Members of the Partnership Board are recommended to:

- 1) **Agree the draft response to the House of Commons Transport Committee’s Call for Evidence – ‘Supercharging the EV transition’.**
  - 2) **Agree the draft response to Ministry of Housing, Communities and Local Government Consultation on National Planning Policy Framework: proposed reforms and other changes to the planning system**
  - 3) **Agree the draft response to Department for Transport and Office for Zero Emissions Vehicles’ consultation on New HGV CO2 emissions regulatory framework for the UK**
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**1. Introduction**

1.1 Transport for the South East (TfSE) has prepared responses to these recent consultations. This paper provides an overview of the responses to the following consultations:

- House of Commons Transport Committee’s Call for Evidence – ‘Supercharging the EV transition’
- Ministry of Housing, Communities and Local Government consultation on National Planning Policy Framework: proposed reforms and other changes to the planning system
- Department for Transport and Office for Zero Emissions Vehicles consultation on New HGV CO2 emissions regulatory framework for the UK

**2. House of Commons Transport Committee’s Call for Evidence - ‘Supercharging the EV transition’**

2.1 In December 2025, TfSE responded to House of Commons Transport Committee’s Call for Evidence - ‘Supercharging the EV transition’. This response is

contained in **Appendix 1**.

2.2 The response noted TfSE's support for the Committee's focus on ensuring the EV transition is enabled by a charging network that is reliable, affordable, accessible and equitably distributed. Evidence from local delivery partners indicates that accelerating rollout at the required pace will depend on reducing system wide delivery friction, particularly around grid connections, programme administration, procurement capacity and clarity on cross-pavement and accessibility requirements.

2.3 The response noted that TfSE also encourages Government and delivery partners to ensure the charging network evolves to support commercial fleets alongside private vehicles. TfSE stands ready to support Government and partners by convening stakeholders, sharing evidence and building local capability through our Centre of Excellence platform and regional forums.

### **3. Ministry of Housing, Communities and Local Government (MHCLG) Consultation on National Planning Policy Framework: proposed reforms and other changes to the planning system**

3.1 MHCLG opened their consultation in December 2025. TfSE submitted a response in March 2025 which is contained in **Appendix 2**.

3.2 The response sets out TfSE's comments on selected consultation questions within the draft National Planning Policy Framework. The response focuses on matters relating to transport, infrastructure delivery, spatial integration, freight and logistics, climate mitigation and adaptation, and the interaction between spatial planning, transport investment and energy network capacity.

1.4. The response highlights that across the South East, the interaction between housing delivery, employment growth, transport infrastructure and electricity network capacity is increasingly complex. It states the effectiveness of the revised Framework will depend on how well these elements are integrated in practice. A significant opportunity is highlighted to strengthen alignment between:

- Spatial Development Strategies and Local Plans;
- Local Transport Plans and emerging Transport Delivery Plans;
- Regional Energy Strategic Plans and electricity network investment programmes.

1.5. The response affirms TfSE stands ready to work with government and partners to support the effective implementation of the revised Framework across the South East.

### **4. Department for Transport and Office for Zero Emissions Vehicles' consultation on New HGV CO2 emissions regulatory framework for the UK**

4.1 The Department for Transport and Office for Zero Emissions Vehicles opened their consultation in December 2025. TfSE submitted a response in March 2025, which is contained in **Appendix 3**.

4.2 The response noted TfSE's support for a framework centred on a ZEV mandate for HGVs, supported by CO<sub>2</sub> emission improvement targets for the remaining diesel fleet, and reflects operator readiness and financial constraints. This framework offers consistency, clarity, and common standards for the sector, thereby supporting compliance.

4.3 The response noted that TfSE supports a criterion for a net zero HGV vehicle as one which has no internal combustion engine. To allow the definition to include hydrogen fuel-cell battery-operated HGVs, as vehicles which only emits Euro VI standards for pollutants, including nitrogen oxides, particulate matter, and carbon monoxide.

4.4 The response noted that TfSE supports the introduction of regulations for all HGV vehicles, including coaches and those that are harder to decarbonise, noting the trajectory for both to deliver net zero emissions may be longer than that for HGVs.

4.5 The response noted TfSE's support for emission reduction targets of at least 45 per cent by 2030, 65 per cent by 2035, and 90 per cent by 2040, alongside confirmation that the 2035 phase-out for HGVs up to and including 26 tonnes and the 2040 phase-out for all new HGVs remain fixed.

## **5. Conclusions and recommendations**

5.1 The Members of the Partnership Board are recommended to agree the draft responses to the consultations detailed in this report.

**RUPERT CLUBB**  
**Chief Officer**  
**Transport for the South East**

Contact Officer: Emily Bailey  
Email: [emily.bailey@transportforthesoutheast.org.uk](mailto:emily.bailey@transportforthesoutheast.org.uk)

## **Transport for the South East (TfSE) draft response to the House of Commons Transport Committee Call for Evidence – ‘Supercharging the EV transition’.**

### **1. Introduction**

1.1 Transport for the South East (TfSE) welcomes the opportunity to contribute to the Committee’s inquiry. This is a draft officer response that will be presented to our Partnership Board on 2 February 2026 for approval. A further iteration may therefore follow.

1.2 TfSE is the sub-national transport body (STB) for the South East of England. Our principal decision-making body, the [Partnership Board](#), brings together representatives from our 16 constituent local transport authorities, district and borough authorities, protected landscapes, business representatives, Highways England, Network Rail and Transport for London.

1.3 We have a vision-led [Transport Strategy](#) in place to influence government decisions about where, when and how to invest in our region to 2050. Decarbonisation is one of the five core “missions,” set out in the strategy alongside Strategic Connectivity, Resilience, Integration and Sustainable Growth.

1.4 Our [Strategic Investment Plan](#), which is currently being refreshed, provides a framework for delivering our Transport Strategy setting out transport infrastructure and policy interventions needed in our region over the next three decades. This is also in the process of being refreshed, with development work due to be completed by the end of 2025.

1.5 For this call for evidence, TfSE is focusing our response on Questions (g) and (h). TfSE’s work is focused on supporting local transport authorities to deliver EV charging infrastructure (EVCI) and does not analyse the impacts of taxes or subsidies in the consumer EV market. Our regional perspective gives us ‘on the ground’ insight on delivery barriers and opportunities for accelerating the rollout of EVCI across the South East.

### **2. TfSE evidence base for response**

2.1 Our evidence draws on insight captured through EVCI related projects TfSE has delivered between x and this Financial Year. Supporting technical documents are available as part of TfSE’s published outputs and can be provided to the Committee on request. The key sources used in developing this submission:

- (i) TfSE’s EVCI Discovery Project - Structured interviews with officers across local transport authorities in the South East which corroborates consistent delivery barriers experienced by local transport authorities; and
- (ii) TfSE’s EVCI Fleet Forecast Methodology – Methodology for forecasting energy and charging demand arising from the electrification of commercial vehicle fleets to inform ‘fleet ready’ infrastructure planning.

### **3. Responses to the questions in the call for evidence**

#### **3.1 Question G: What further action is required to ensure that the rollout of EV charging infrastructure facilitates transition at the necessary rate?**

3.1.1 TfSE agrees that further action is required. Our evidence suggests that rollout pace is being currently constrained by a combination of different factors. These include:

- (i) grid connection lead times;
- (ii) programme administration and procurement burdens; and
- (iii) unresolved areas affecting on-street delivery (notably cross-pavement solutions and accessibility).

TfSE also considers it important that national approaches broaden beyond a predominantly car-focused model and also support the charging needs of commercial vehicles.

#### **Key delivery constraints from the perspective of local transport authority officers**

The points below summarise the most consistent constraints raised by local transport authorities through TfSE’s recent work programme, including structured interviews with LTAs and the synthesis presented in our EVCI Discovery Project Summary Report. These are not intended to be exhaustive, but represent the most common factors affecting pace, cost and confidence in the rollout of EV charging infrastructure.

1. Funding and administration (including LEVI): Delays linked to election and funding cycles, lengthy governance and procurement routes, slow approvals, scope changes, and uncertainty or late guidance that can affect the ability to submit and progress tender documentation.
2. Commercial models and procurement: Local authorities report limited capacity (time, skills and experience) to run procurements effectively. They also note that Charge point operators can be saturated with Requests for Proposals, and that

certain contract terms (including perceived risks around return on investment and early termination provisions) can deter investment.

3. Planning / highways consents: Delivery teams report that changes in direction and delayed guidance on highways processes can slow progress. This is particularly the case where there is uncertainty around approvals, heads of terms and the sequencing of consents, leading to rework and delay.
4. On-street delivery and public consent: High-density areas often face parking and bay constraints, which can limit where infrastructure can be deployed. Local authorities also need proportionate consultation processes to manage expectations and avoid backlash, which can extend delivery timescales if not well supported.
5. Accessibility and cross-pavement solutions: Local partners highlight unresolved policy, safety and liability questions that can slow scalable on-street delivery. This is particularly important where solutions must work safely and reliably for disabled users, and where responsibilities and standards are not yet sufficiently clear.
6. Grid connections: Significant Distribution Network Operator (DNO) delays are consistently reported as a critical path risk for many schemes. Uncertainty around connection timelines can affect programme planning, procurement sequencing and the ability to give confidence to residents and investors.
7. Capacity and skills: Local authorities report staff shortfalls in key disciplines such as GIS, procurement and legal support. It has also been highlighted that limited dedicated project resources across local authorities and delivery partners can slow delivery and reduce the ability to manage risks proactively.
8. Commercial fleets: Limited availability of suitable charging for larger vehicles (including space requirements, dwell time and power needs) can constrain fleet electrification. Limited capacity for fleet engagement and demand validation can make it harder to plan investable infrastructure at the right locations and at the right scale.

### **Recommendations (practical actions for the Government and the sector)**

The recommendations below build on the delivery constraints set out above and reflect TfSE's recent engagement with local delivery teams. They focus on practical actions to reduce system friction and accelerate delivery, by improving clarity, predictability and coordination across the EV charging ecosystem.

1. Ensure the rollout of EVCI supports commercial vehicle fleets as well as private cars: Set an expectation that programmes and local plans explicitly consider vans, buses and HGVs (and taxis/PHVs where relevant), including physical and operational access for larger vehicles.

2. Reduce programme friction and improve predictability (including LEVI): Streamline approvals, stabilise requirements to reduce scope churn, and improve transparency/coordination of tender pipelines to reduce market congestion.
3. Support investable procurement at scale: Provide model documentation and contract positions that reflect real-world risk allocation and enable 'bundling' approaches so smaller authorities can bring forward investable opportunities.
4. Resolve on-street policy barriers (cross-pavement and accessibility): Provide clear national frameworks for permitting, safety, liability and inclusive design so local authorities can progress schemes consistently and at pace.
5. Tackle grid connection delays through stronger coordination: Improve certainty on connection lead times and create effective escalation routes between DNOs, local authorities and charge point operators, recognising grid delivery as a critical path.
6. Improve monitoring and data transparency: Standardise the reporting of reliability, utilisation and performance (in a proportionate and privacy-respecting way) to support better planning, accountability and value for money across the industry.

### **3.2 Question H: How effectively is the Department for Transport addressing issues in the rollout of charging infrastructure such as affordability, geographic equity, accessibility, administration of funding, and the availability of grid connections?**

3.2.1 The Department for Transport has established a range of programmes intended to support the rollout of charging infrastructure. However, from the perspective of local delivery partners, national direction has not always translated into clear, consistent and timely guidance for implementation. Our evidence indicates that effectiveness is currently constrained by persistent delivery barriers in funding administration, grid connections, and unresolved policy areas affecting accessibility and on-street delivery. TfSE also considers that current approaches would be strengthened by explicitly reflecting the requirements of commercial fleets alongside private vehicle provision.

#### **Affordability**

Affordability pressures arise both for residents and for fleet operators. Local delivery partners report tensions between tariff expectations and commercial viability, particularly where utilisation and investor confidence are uncertain. Improving data transparency and creating investable delivery models is therefore part of ensuring affordable provision in the places that need it most.

#### **Geographic equity**

Equity is shaped by two main factors. Household reliance on public charging is higher in some places (for example, high-density areas with constrained parking and limited

off-street options). Fleet demand is also concentrated in logistics and industrial areas and along strategic corridors. A stronger national approach would explicitly recognise these different demand geographies and avoid leaving less commercially attractive areas behind.

### **Accessibility**

Local partners highlight challenges with EV bay accessibility and concerns around cross-pavement solutions, including liability and safety for disabled users. Clearer national standards and policy clarity would improve consistency and reduce local re-litigation of the same issues.

### **Administration of funding**

Evidence from TfSE's work indicates that LEVI processes can be slowed by multi-layer governance and lengthy procurement, with delays arising from funding cycles, scope changes, and uncertainty or late guidance that affects tender approvals. This administrative friction can hold back delivery even where funding exists.

### **Grid connections**

Significant DNO delays remain a major delivery constraint. This affects both public charging schemes and the larger connections likely required for fleet charging hubs (such as depots and logistics sites), reinforcing the need for stronger cross-sector coordination.

### **Commercial vehicles and fleets**

TfSE's fleet forecasting work highlights that commercial vehicles are expected to represent a substantial share of future energy and charging demand. National programmes should therefore embed fleet requirements and monitoring, alongside enabling delivery at depots, workplaces, logistics hubs and strategic corridors.

### **Recommendations**

The recommendations below reflect TfSE's assessment of the delivery issues outlined above and focus on improvements that would strengthen the effectiveness of national support. They are intended to be actionable within existing roles and responsibilities, with a focus on simplifying delivery pathways, improving coordination (including with the energy system), and strengthening consistency on standards and data.

1. Simplify and stabilise programme administration and approvals (including LEVI), with clearer and earlier guidance.
2. Strengthen grid coordination and provide greater certainty on connection lead times, including for fleet hubs.

3. Provide national clarity on cross-pavement and accessibility standards to unlock scalable on-street delivery.
4. Enable procurement approaches that reduce transaction costs and support market capacity, including bundled opportunities where appropriate.
5. Embed commercial vehicle charging needs in national infrastructure planning and monitoring, reflecting their significant contribution to mileage/emissions and future energy demand.

## **4 Conclusion**

4.1 TfSE supports the Committee's focus on ensuring the EV transition is enabled by a charging network that is reliable, affordable, accessible and equitably distributed. Our evidence from local delivery partners indicates that accelerating rollout at the required pace will depend on reducing system wide delivery friction, particularly around grid connections, programme administration, procurement capacity and clarity on cross-pavement and accessibility requirements. TfSE also encourages Government and delivery partners to ensure the charging network evolves to support commercial fleets alongside private vehicles. TfSE stands ready to support Government and partners by convening stakeholders, sharing evidence and building local capability through our Centre of Excellence platform and regional forums.

# Transport for the South East Response to Consultation on the Draft National Planning Policy Framework (December 2025)

## 1. Introduction

1.1. Transport for the South East (TfSE) is the Sub-national Transport Body for the South East of England. TfSE works with constituent local transport authorities, national agencies and stakeholders to develop and deliver a strategic transport system that supports sustainable economic growth, improves connectivity, enhances resilience and contributes to national decarbonisation objectives.

1.2. Transport for the South East welcomes the opportunity to comment on the draft Framework and supports the objective of creating a clearer and more rules-based planning system that enables sustainable growth. This is a draft response which will be presented to our Partnership Board on 19 March for their agreement. A further iteration may therefore follow.

1.3. This response sets out TfSE's comments on selected consultation questions within the draft National Planning Policy Framework. The response focuses on matters relating to transport, infrastructure delivery, spatial integration, freight and logistics, climate mitigation and adaptation, and the interaction between spatial planning, transport investment and energy network capacity.

1.4. Across the South East, the interaction between housing delivery, employment growth, transport infrastructure and electricity network capacity is increasingly complex. The effectiveness of the revised Framework will depend on how well these elements are integrated in practice. There is a significant opportunity to strengthen alignment between:

- Spatial Development Strategies and Local Plans;
- Local Transport Plans and emerging Transport Delivery Plans;
- Regional Energy Strategic Plans and electricity network investment programmes.

1.5. TfSE stands ready to work with government and partners to support the effective implementation of the revised Framework across the South East.

## 2. Responses to Consultation Questions

### 2.1. The plan-making framework

**Question 6 - Do you agree with the role, purpose and content of spatial development strategies set out in policy PM1?**

**Response:** Partly agree

Transport for the South East supports the principle of Spatial Development Strategies as an important mechanism for aligning housing growth, employment distribution and strategic infrastructure planning across functional economic areas.

The South East contains multiple cross boundary travel to work and freight corridors, and road and rail networks do not align with individual local authority boundaries. A strategic planning tier therefore has the potential to improve coordination of infrastructure provision with growth. However, greater clarity is required on how Spatial Development Strategies will integrate with:

- Local Transport Plans and emerging Transport Delivery Plans;
- Funding assumptions for strategic infrastructure;
- Regional Energy Strategic Plans and electricity network capacity planning.

For Spatial Development Strategies to be effective, infrastructure requirements must be identified alongside housing and employment distributions, with transparent phasing and delivery assumptions. Without this integration, there is a risk that strategies will allocate growth in locations where strategic transport or energy infrastructure capacity is constrained.

TfSE therefore supports the intent of the proposal but recommends clearer guidance on how transport and energy infrastructure evidence should be incorporated at the Spatial Development Strategy stage.

**Question 7 - Do you agree that alterations should be made to spatial development strategies at least every 5 years to reflect any changes to housing requirements for the local planning authorities in the strategy area?**

**Response:** Agree in principle

A regular review cycle is appropriate to ensure that Spatial Development Strategies remain aligned with evolving housing needs, infrastructure programmes and decarbonisation pathways. However, the effectiveness of a five year alteration cycle will depend on alignment with other statutory and strategic cycles, including:

- Local Plan review cycles;
- Local Transport Plan updates;
- Transport Delivery Plan funding settlements;
- Electricity network investment planning periods.

If these cycles are not aligned, there is a risk of repeated plan alterations without corresponding infrastructure funding certainty. TfSE recommends that guidance clarify how review cycles should align with infrastructure investment programming to ensure that revisions to housing distribution are informed by realistic transport and energy delivery assumptions.

**Question 9 - Do you agree with the role, purpose and content of local plans set out in policy PM2?**

**Response:** Partly agree

TfSE supports the clarification of Local Plans as the primary vehicle for allocating land and setting development requirements within a clear strategic framework. However, to support infrastructure led growth, Local Plans should explicitly demonstrate how:

- Allocations are supported by transport capacity assessments covering the whole transport network, not solely highways;
- Carbon impacts of proposed growth patterns have been assessed using a consistent methodology;
- Infrastructure phasing is aligned with housing delivery trajectories.

There is a risk that Local Plans will continue to rely on optimistic assumptions about infrastructure funding or capacity enhancements. Strengthened guidance on the integration of Local Plans with Transport Delivery Plans would improve confidence that allocations are deliverable and aligned with national decarbonisation objectives.

## 2.2. Preparing plans

### Question 13 - Do you agree with the approach to the preparation of plan evidence set out in policy PM8?

**Response:** Partly agree

TfSE supports the intention to streamline plan making and avoid unnecessary duplication of evidence. Proportionate evidence requirements can improve timeliness and certainty in plan preparation. However, transport and infrastructure evidence must remain sufficiently robust to ensure that growth allocations are deliverable and aligned with national policy objectives. In particular, plans should be supported by:

- Network wide, multi modal transport assessments addressing rail capacity, bus networks, active travel infrastructure and both strategic and local road impacts;
- Transparent assumptions regarding infrastructure funding and delivery timing;
- Carbon assessments that reflect both transport user emissions and wider infrastructure impacts.

Where evidence is simplified or standardised, there is a risk that corridor specific constraints or cumulative impacts may be under represented. Clear guidance should therefore confirm that proportionate evidence does not mean reduced rigour in assessing strategic transport capacity and decarbonisation impacts.

This approach is important to ensure the delivery of road-based, public transport, freight, and logistics outcomes that benefit areas beyond the planning authorities' borders. We would also encourage planners to take into account broader, cross-boundary evidence, especially concerning freight and rail issues. Later policies in the revised NPPF encourage planners to locate new housing near rail stations, so it is imperative to gather appropriate evidence, e.g., a comprehensive capacity assessment to ensure sufficient capacity on the rail line and at the station. Likewise, the delivery and servicing needs of new developments should be assessed before they are included in a local authority's plan. This should include the possibility of using sustainable freight transport modes as alternatives to road transport (e.g., rail and water), the need for driver welfare, and charging facilities for both vans and lorries. The increasingly high volume of freight and logistics demands from new housing developments, employment centres, and major infrastructure projects, and the need to reduce congestion and improve air quality, require a more sustainable approach to servicing and delivery beyond the traditional transport assessment for refuse collection.

### Question 14 - Do you agree with the approach to identifying land for development in PM9

**Response:** Partly agree

TfSE supports the objective of ensuring sufficient land is identified to meet development needs in a timely manner. However, land identification should be explicitly linked to infrastructure capacity and deliverability. In areas such as the South East, where rail and highway corridors are already operating under significant pressure, the allocation of land without corresponding infrastructure provision risks exacerbating congestion and undermining sustainable transport objectives. Plans should therefore be able to demonstrate:

- That identified sites are located where sustainable transport options are realistically available or can be provided;
- That cumulative impacts across administrative boundaries have been considered;

- That necessary transport and energy infrastructure is deliverable within the plan period.

Strengthening the link between site identification and infrastructure programming would improve confidence that development patterns are genuinely infrastructure led.

**Question 15 - Do you agree with the policies on maintaining and demonstrating cross-boundary cooperation set out in policy PM10 and policy PM11?**

**Response:** Partly Agree

TfSE supports the intention to strengthen cross boundary cooperation on strategic matters. The South East economy functions across multiple administrative areas, with travel to work patterns, freight flows and strategic transport corridors extending beyond local authority boundaries. Effective cooperation is therefore essential for aligning housing distribution with infrastructure provision. To be effective, cooperation arrangements should:

- Be informed by shared transport and energy evidence at functional economic area scale;
- Address cumulative impacts across multiple authorities;
- Provide clarity on how infrastructure funding responsibilities are apportioned.
- Greater clarity on how Spatial Development Strategies, Local Plans and Transport Delivery Plans interact would further strengthen the effectiveness of cross boundary planning.

TfSE strongly recommends that freight and rail matters be specifically mentioned in policies PM10 and PM11. This will ensure that there is a specific mention of how issues related to sustainable freight servicing and delivery, driver welfare, and rail passenger and freight infrastructure requirements are discussed, recorded and reviewed regularly by all authorities across neighbouring planning authority areas. Freight and rail facilities and requirements cannot be considered on a local, small-scale basis; they must be considered strategically to ensure that both the needs of the developments concerned, and the freight and rail requirements are properly addressed and integrated in the land-use planning process.

### **2.3. Examining plans**

**Question 19 - Do you agree that the tests of soundness set out in policies PM14 and PM15 will allow for a proportionate assessment of spatial development strategies, local plans and minerals and waste plans at examination?**

**Response:** Partly agree

TfSE supports the principle that plans should be deliverable and based on proportionate evidence. However, the effectiveness of the soundness tests will depend on how deliverability is interpreted in practice. In areas of significant growth pressure, there is a risk that infrastructure assumptions are treated as aspirational rather than secured. For plans to be considered sound, it should be clear that:

- Transport infrastructure required to support allocations is either committed, funded or realistically programmed;
- Carbon implications of spatial choices have been assessed;
- Cross boundary impacts have been addressed through effective cooperation.
- Clearer guidance on infrastructure deliverability within the soundness framework would strengthen confidence in long term growth strategies.

## 2.4. Achieving sustainable development

### **Question 34 - Do you agree with the proposed approach to setting a spatial strategy in development plans?**

**Response:** Strongly Agree

TfSE strongly agrees with policy S1, which states that development plans should be positively forward-looking and seek to meet the development needs of their area. This includes providing for objectively assessed housing and other needs (including supporting infrastructure), as well as any needs that cannot be met within neighbouring areas. This should mean that new developments include improvements to the wider environment that promote sustainable patterns of growth, mitigate climate change, and adapt to its effects.

### **Question 36- Do you agree with the revised approach to the presumption in favour of sustainable development?**

**Response -** Partly agree.

TfSE supports this approach because it should result in housing and employment developments being sited close to sustainable transport, thereby reducing reliance on private cars. However, a comprehensive capacity assessment must be carried out to determine whether there is sufficient capacity on the adjacent rail line or corridor. Where major developments are concerned, such as new towns, large employment centres, or large infrastructure projects, the land around rail stations should also be assessed for its potential to support sustainable freight servicing and delivery to that development, either as a rail or road-based freight interchange, consolidation centre, or warehousing site.

### **Question 40 - Do you agree with the proposed approach to development around stations, including that it applies only to housing and mixed-use development capable of meeting the density requirements in chapter 12?**

**Response:** Partly agree

TfSE supports the principle of directing higher density development to locations with strong public transport accessibility. Development around rail stations can make efficient use of existing infrastructure and support modal shift. However, a uniform approach risks overlooking important differences in station typology, service frequency and onward connectivity. Not all stations within the South East have the capacity to accommodate significant additional demand without investment in rail infrastructure, interchange facilities or active travel interventions. Support for development around stations should therefore be linked to:

- Realistic assessment of rail network capacity and service levels;
- Safe and convenient walking and cycling access;
- Bus connectivity and interchange quality;
- Funding and delivery of necessary capacity enhancements.
- A more explicit link between density expectations and infrastructure capability would reduce the risk of overloading constrained parts of the network.

## 2.5. Tackling climate change

**Question 42 – Do you agree with the approach to planning for climate change in policy CC1?**

**Response:** Agree in principle

TfSE supports the strengthened emphasis on addressing climate change through spatial planning. Spatial choices have a significant and long term influence on transport emissions. Locating development in areas with strong public transport accessibility and proximity to employment and services is central to achieving national carbon reduction objectives. However, the effectiveness of the policy will depend on consistent application and clear methodologies. Plans should demonstrate:

- How spatial allocations reduce the need to travel by private car;
- How transport emissions have been assessed using a transparent and consistent methodology;
- How infrastructure phasing supports early delivery of sustainable transport options.
- Without clearer expectations on carbon assessment and monitoring, there is a risk that climate objectives remain aspirational rather than embedded in spatial decision making.

**Question 43 – Do you agree with the approach to mitigating climate change through planning decisions in policy CC2?**

**Response:** Partly agree

TfSE supports measures that contribute to emissions reduction across the built environment. However, mitigation in transport is heavily influenced by spatial form and infrastructure provision. The Framework should make clear that mitigation includes:

- Reducing transport demand through compact, well connected development patterns;
- Supporting modal shift through early provision of public transport and active travel infrastructure;
- Aligning growth with areas where electricity network capacity can support electrification of transport.

Stronger alignment between mitigation policy and transport infrastructure programming would improve delivery of national net zero commitments.

**Question 44 – Do you agree with the approach to climate change adaptation through planning decisions in policy CC3?**

**Response:** Agree

TfSE supports the inclusion of clearer policies on climate adaptation. Transport networks in the South East are increasingly exposed to extreme weather events, including heat stress and flooding. Spatial planning decisions should take account of long term resilience of strategic transport corridors. Plans should demonstrate that:

- Critical transport infrastructure is protected from increased climate risk;
- Development does not exacerbate flood risk affecting transport networks;
- Adaptation measures are integrated with infrastructure planning.

A stronger emphasis on infrastructure resilience within spatial strategies would support long term network reliability.

**Question 47 - Do you have any other comments on actions that could be taken through national planning policy to address climate change?**

TfSE considers that the integration of spatial planning, transport decarbonisation and energy network capacity is critical. There is an opportunity to strengthen references to the alignment between Local Plans, Transport Delivery Plans and Regional Energy Strategic Plans to ensure that growth, electrification and infrastructure investment are coordinated.  
Planning for energy and water infrastructure

## **2.6. Building a strong, competitive economy**

**Question 84- Do you agree that more emphasis should be placed on relevant national strategies and the need for flexibility in planning for economic growth, as drafted in policy E1?**

**Response** – Strongly Agree

TfSE strongly supports this policy because it provides distinct provisions for freight and logistics sites, which are essential to an efficient supply chain and sustainable economic growth.

**Question 85 – Do you agree with the approach to meeting the need for business land and premises in policy E2?**

**Response:** Partly agree

TfSE supports ensuring sufficient land is identified for employment growth. However, employment land distribution has direct implications for travel patterns and congestion. Business land allocations should be located where sustainable transport options are viable and where strategic transport capacity exists or can be delivered. Failure to align employment growth with transport infrastructure may increase car dependency and undermine decarbonisation objectives.

**Question 86 – Do you agree with the proposed new decision-making policy supporting freight and logistics development in policy E3?**

**Response:** Partly agree

TfSE supports recognition of the importance of freight and logistics to economic growth. The South East contains nationally significant ports, airports and logistics corridors. Safeguarding appropriate land for freight and logistics development is essential to maintain supply chain resilience and support economic competitiveness. However, freight growth must be planned alongside:

- Strategic road and rail freight capacity;
- Access to ports and intermodal facilities;
- Mitigation of environmental and congestion impacts.

Stronger alignment between logistics land allocation and strategic transport corridor capacity would improve long term network efficiency.

**Question 88 - Do you agree with the proposed changes to policy for planning for town centres?**

**Response** – Partly agree

This policy should include specific reference to the needs of freight and logistics sector, which plays a central role in supplying goods and services to town centres. Therefore, consideration should be given to including a specific reference to this sector in this policy. A reference should be included in the last paragraph, which sets out the use of design plans and master plans as a requirement for a freight and logistics servicing and delivery plan. This plan would outline how the town centre would manage its goods deliveries and service visits in a safe, efficient, and sustainable manner. Such a plan would reduce the impact of LGVs and HGVs on both the town centre and the surrounding transport network, particularly to address congestion, air quality, and safety issues and increase freight and logistics operator efficiency.

## **2.7. Securing Clean Energy and Water**

**Question 96 – Do you agree with the approach to planning for energy and water infrastructure in policy W1?**

**Response:** Agree in principle

TfSE supports clearer policy on energy infrastructure planning. Transport decarbonisation, including the electrification of rail and the transition to electric vehicles and zero-emission buses, is dependent on electricity network capacity and reinforcement. Spatial plans should therefore:

- Be informed by Regional Energy Strategic Plans and Distribution Network Operator investment programmes;
- Consider the cumulative impact of growth and transport electrification on network demand;
- Ensure that energy infrastructure upgrades are programmed alongside development.

Closer integration between energy and transport planning will be essential to deliver sustainable growth.

**Question 97 – Do you agree with the amendments to current Framework policy on planning for renewable and low-carbon energy development and electricity network infrastructure in policy W2?**

**Response:** Agree

TfSE supports facilitating renewable energy and electricity network infrastructure. A resilient and expanded electricity network is fundamental to transport decarbonisation. Planning policy should enable timely delivery of reinforcement and generation projects required to support both housing growth and transport electrification. Clearer reference to the interaction between transport infrastructure and electricity network planning would further strengthen the policy framework.

## **2.8. Making effective use of land**

**Question 114 - Do you agree policy L1 provides clear guidance on how Local Plans should be prepared to promote the efficient use of land?**

**Response:** Partly agree

This policy ignores the need to protect previously developed land, such as railheads, rail sidings, river wharves, and car parks. There is a pressing need to remove HGVs from the road, not only to reduce congestion but also to improve air quality and road network resilience. There is the potential for redundant transport infrastructure to be repurposed to revive a rail interchange site, provide a sea/river wharf to load and unload goods and transfer goods by rail and water rather than by road. Large car parks could also be used as freight consolidation or interchange sites to allow the transfer of goods from diesel to zero-emission freight vehicles. In addition, these sites, particularly on the edge of towns, could also be repurposed to serve as future HGV alternative-fuel recharging or refuelling sites, or as smaller safe and secure lorry parking sites.

**Question 121 - Do you agree policy L3 provides clear guidance on achieving appropriate densities for residential and mixed-use schemes?**

**Response:** Partly agree

TfSE supports the objective of providing clearer national guidance on density, particularly where this supports sustainable travel patterns and efficient use of infrastructure. Policy L3 moves in the right direction by linking density to accessibility and transport connectivity.

However, from a transport perspective, the policy would benefit from clearer reference to infrastructure capacity as distinct from proximity. While accessibility is an important factor, density decisions should also reflect:

- Peak rail and highway capacity constraints
- Station throughput and platform capacity
- Quality and capacity of bus and active travel networks
- Cumulative corridor impacts across local authority boundaries

Without explicit reference to infrastructure capability and deliverability, there is a risk that density expectations are set in locations where the transport network cannot accommodate additional demand without significant investment.

The guidance could be strengthened by:

- Requiring plan makers to demonstrate that density assumptions are aligned with realistic transport capacity and funding pathways;
- Making clear that accessibility metrics should be supported by capacity and infrastructure assessments;
- Encouraging integration with Transport Delivery Plans to ensure infrastructure phasing aligns with density expectations.

**Question 122 - Do you agree with the minimum density requirements set out within policy L3?**

**Response:** Partly agree

TfSE recognises that minimum density requirements can help promote compact development and reduce car dependency where this is supported by strong public transport networks. However, minimum density standards should not operate as a blunt national tool. In parts of the South East, rail corridors and some stations are already operating close to peak capacity. Applying minimum densities without regard to network constraints may:

- Exacerbate crowding on constrained rail services;
- Increase pressure on highway networks where rail capacity is insufficient;

- Lead to car-based access to stations if sustainable access is not delivered early.

Minimum densities should therefore be contingent on demonstrable infrastructure capacity or a funded and deliverable investment pathway.

**Question 123 - Do you agree that using dwellings per hectare is an appropriate metric for setting minimum density requirements? Additionally, is our definition of 'net developable area' within the NPPF suitable for this policy?**

**Response:** Partly agree

Dwellings per hectare is a familiar and widely understood metric, which supports consistency across plan making. However, from a transport perspective, density metrics alone do not capture transport demand intensity. High densities located adjacent to constrained rail corridors may generate substantial peak demand that exceeds network capability, even if the dwellings per hectare metric appears appropriate. In addition, definitions of net developable area should be clear to avoid inconsistencies that may distort comparisons between sites. TfSE recommends that density metrics be accompanied by:

- Transport capacity assessments;
- Consideration of peak travel demand implications;
- Clear guidance on how infrastructure space such as bus priority, cycle routes and interchange areas is treated within net developable area calculations.

**Question 124 - Do you agree with the proposed definition of a 'well-connected' station used to help set higher minimum density standards in targeted growth locations?**

**Response:** Partly agree

TfSE supports the principle of linking higher density standards to well-connected stations. However, the definition of "well-connected" should go beyond service frequency and Travel to Work Area metrics. A station may meet service frequency thresholds yet still be constrained by:

- Platform capacity limitations;
- Peak train crowding;
- Limited interchange space;
- Insufficient active travel or bus integration.

Similarly, Travel to Work Area metrics may not fully reflect strategic corridor pressures or cumulative growth impacts across the South East. TfSE recommends that the definition of "well-connected" incorporates:

- Peak period rail capacity and load factors;
- Interchange quality and multi-modal integration;
- Access to frequent bus services and safe active travel routes;
- Demonstrable infrastructure investment plans aligned with proposed density uplift.

This would ensure that higher densities are directed to stations capable of supporting them sustainably.

**Question 125 - Are there other types of location where minimum density standards should be set nationally?**

**Response:** Yes

In addition to well-connected rail stations, national minimum density standards could be considered for:

- Urban cores with high quality public transport networks;
- Locations served by high frequency mass transit systems;
- Strategic public transport interchanges with demonstrable spare capacity.

Definitions should be based on measurable transport criteria, including:

- Service frequency;
- Peak capacity;
- Multi-modal integration;
- Proximity to major employment centres.

Density standards should be indicative rather than rigid, and contingent on infrastructure capability.

**Question 126 - Should we define a specific range of residential densities for land around stations classified as ‘well-connected’?**

**Response:** Yes, subject to infrastructure tests.

A defined range could provide clarity and consistency. However, it should:

- Reflect differences in station typology;
- Be aligned with capacity and infrastructure investment;
- Allow flexibility where constraints exist.

A range approach is preferable to a single national figure.

**Question 127 - If so, what should that range be, and which locations should it apply to?**

**Response:** TfSE does not propose a single national density figure. Appropriate ranges should:

- Reflect the level of service frequency and rail capacity;
- Be higher in metropolitan or high-capacity rail contexts;
- Be lower in locations where network constraints exist.

The key principle should be that density uplifts are aligned with realistic infrastructure capability and delivery pathways, rather than proximity alone.

## **2.9. Protecting Green Belt land**

**Question 133 - Do you agree with proposals to better enable development opportunities around suitable stations (*in the Green Belt*) to be brought forward?**

**Response:** Partly agree

TfSE supports the principle of focusing additional development in locations where high quality public transport already exists, and where higher densities can support sustainable travel patterns. Enabling well planned growth around suitable stations can make efficient use of land, support modal shift, and reduce the need to travel by car, provided the station truly functions as a high capacity, well connected node.

However, TfSE is cautious about applying a broad enabling presumption in the **Green Belt** without clear tests of suitability and deliverability. In the South East, many rail corridors and some stations are already operating at or near peak capacity. In those circumstances, bringing forward development around stations could overload constrained rail services,

worsen interchange pressures, and lead to car based access to stations if walking, cycling and bus connections are not improved. That would undermine the purpose of using station locations to support sustainable development.

TfSE therefore supports the proposal subject to the policy being strengthened to require that station related **Green Belt** development demonstrates, at plan making stage and development management stage where relevant:

- Rail service and station capacity, including peak period capacity, is sufficient or is capable of being increased within a realistic funding and delivery pathway.
- Safe and convenient access by walking, cycling and bus is provided from the outset, with high quality interchange and no reliance on private car access as the default.
- A clear infrastructure and phasing plan is in place so that sustainable transport measures are delivered early, aligned with Local Plans and Transport Delivery Plans.
- Cumulative impacts on the wider network and across local authority boundaries are assessed, including impacts on the strategic road network where car travel may be displaced.

With these safeguards, TfSE considers the proposal could support genuinely sustainable station led development while avoiding unintended impacts on constrained rail and road corridors and protecting the core purposes of the Green Belt.

**Question 136 - Do you agree policies GB6 and GB7 set out appropriate tests for considering development on Green Belt land?**

**Response:** Partly agree

TfSE recommends that freight and logistics infrastructure should be added to the list of development categories that are classed as 'not inappropriate' for sites within the Green Belt. This is supported by the policy TR5, which deals with the need for and protection of roadside facilities. We agree that any such proposal should be demonstrably required in a Green Belt location, and that any impact on the openness of the Green Belt should be minimised. However, there are occasions where the need for freight and logistics infrastructure, such as safe and secure lorry parking or warehousing to support related housing and mixed-use developments and local businesses, could be demonstrated as required for the area. The recent example of the judicial review, which upheld the approval for a proposed lorry parking site within the Green Belt near the Kent Downs National Landscape, serves as a precedent. The site partly abuts the slip road to the M26 motorway at junction 2A and is adjacent to the A20 and near to the M20. Therefore, TfSE recommends that, within the caveats set out in the policy, sites supporting freight and logistics facilities should be added to policy GB7.

## **2.10. Promoting sustainable transport**

**Question 150 – Do you agree that policy TR1 will provide an effective basis for taking a vision-led approach and supporting sustainable transport through plan-making?**

**Response:** Strongly agree

TfSE strongly supports a vision-led approach to transport planning. An outcomes focused approach aligns with TfSE's Transport Strategy, which prioritises sustainable growth, decarbonisation and improved connectivity rather than forecasting traffic growth and

providing additional highway capacity as a default response. The emphasis on shaping development around sustainable transport outcomes is consistent with national carbon objectives and supports more efficient use of infrastructure. However, effective implementation will require:

- Clear guidance on how vision-led principles should be reflected in Local Plans and Transport Delivery Plans;
- Alignment with funding mechanisms to ensure sustainable transport interventions are prioritised;
- Consistent carbon assessment methodologies to support decision making.

A vision led approach will only achieve its intended outcomes if infrastructure programming and spatial planning are aligned from the outset.

**Question 151 – Do you agree that policy TR2 strikes an appropriate balance between supporting maximum parking standards where they can deliver planning benefits, and requiring a degree of flexibility and consideration of business requirements in setting those standards?**

**Response:** Partly agree

TfSE supports flexibility in parking standards to reflect local context and sustainable transport objectives. Parking standards can influence travel behaviour and development viability. In well connected locations, lower parking provision can support modal shift and reduce congestion. However, parking standards should be aligned with:

- Availability and quality of public transport;
- Safe walking and cycling infrastructure;
- Realistic travel behaviour patterns in suburban and rural areas.

Overly restrictive standards in areas without viable alternatives may lead to unintended impacts on local roads or undermine deliverability. Clear guidance linking parking standards to transport accessibility and infrastructure provision would strengthen the policy.

**Question 152 – Do you agree with the changes proposed in policy TR3(1a), including the reference to proposals which could generate a significant amount of movement, and the proposed use of the Connectivity Tool?**

**Response:** Agree in principle

TfSE supports directing development to sustainable locations with strong public transport accessibility and proximity to services. However, assessments of sustainability should be based on realistic measures of connectivity and infrastructure capacity rather than simple distance metrics. In particular:

- Cumulative impacts across neighbouring authorities should be considered;
- Rail and highway capacity constraints should inform spatial choices;
- Carbon impacts of different spatial patterns should be assessed consistently.

Strengthening the integration between spatial allocation decisions and infrastructure capability would improve the effectiveness of this policy.

**Question 153 - Do you agree that proposed policy TR4 provides a sufficient basis for the effective integration of transport considerations in creating well-designed places?**

**Response:** **Partly agree**

TfSE supports the emphasis in TR4 on integrating transport considerations into place-making. The focus on safe, accessible and well-designed streets that prioritise walking, cycling and public transport aligns with TfSE's Transport Strategy and national decarbonisation objectives. However, from a strategic transport perspective, TR4 would

benefit from clearer recognition of how local street design decisions interact with the wider transport network. In areas of significant growth, design quality must be aligned with:

- Strategic network performance and resilience;
- Bus priority and reliability on key corridors;
- Integration with rail stations and interchange capacity;
- Long-term infrastructure programming and funding.

Without explicit reference to network integration and cumulative impacts, there is a risk that well-designed local schemes may inadvertently constrain strategic movement corridors or fail to support reliable public transport operation.

Guidance could be strengthened by:

- Requiring alignment between design codes and Local Transport Plans or Transport Delivery Plans;
- Ensuring that bus priority and active travel infrastructure are safeguarded within street hierarchies;
- Recognising the importance of maintaining strategic corridor functionality alongside place objectives.

**Question 154 - Do you agree with policy TR5 as a basis for supporting the provision and retention of roadside facilities where there is an identified need?**

**Response:** Agree

TfSE supports the principle of retaining and providing roadside facilities where there is a demonstrated need, particularly on the Strategic Road Network and key freight corridors. From a transport perspective, roadside facilities play an important role in:

- Supporting freight efficiency and driver welfare;
- Enabling compliance with drivers' hours regulations;
- Supporting the transition to zero emission heavy goods vehicles, including provision of charging and refuelling infrastructure.

It will be important that policy recognises the emerging need for:

- Electric charging infrastructure for HGVs and vans;
- Future hydrogen refuelling infrastructure where appropriate;
- Safe and accessible facilities aligned with freight demand patterns.

**Question 155 - Do you agree that the amended wording proposed in policy TR6 provides a clearer basis for considering when transport assessments and travel plans will be required, and for considering impacts on the transport network?**

**Response:** Partly agree

TfSE welcomes efforts to clarify when transport assessments and travel plans are required, as consistency improves certainty for developers and authorities. However, clarity should not lead to a narrowing of scope that overlooks cumulative or cross boundary impacts. In the South East, even developments that appear modest in isolation can have significant impacts when considered across:

- Constrained rail corridors;
- Congested highway networks;
- Areas experiencing multiple concurrent allocations.

Transport assessments should therefore:

- Consider cumulative impacts across administrative boundaries;
- Address both capacity and reliability implications;
- Reflect carbon impacts of spatial choices;
- Align with strategic transport evidence at sub-national scale where relevant.

Guidance could be strengthened by explicitly referencing cumulative impacts and the need to consider strategic network effects, not solely localised impacts.

**Question 156 - Do you agree the proposed text in policy TR7 provides an effective basis for assessing proposals for marine ports, airports and general aviation facilities?**

**Response:** Partly agree

TfSE recognises the economic importance of marine ports, airports and aviation facilities to the South East and supports a clear national framework for assessing such proposals. However, these facilities have significant surface access implications and cross boundary impacts. Effective assessment should ensure that:

- Surface transport capacity is demonstrably sufficient or deliverable;
- Rail and highway access implications are fully assessed;
- Freight and passenger access is aligned with decarbonisation objectives;
- Cumulative impacts on strategic corridors are addressed.

For major ports and airports in the South East, surface access infrastructure can extend well beyond host authority boundaries. Policy should therefore emphasise:

- Early engagement with transport authorities;
- Alignment with Local Transport Plans and Transport Delivery Plans;
- Integration with strategic rail and road investment programmes.

Strengthening reference to surface access strategy and infrastructure phasing would improve confidence that growth in ports and airports is supported by sustainable and deliverable transport solutions.

[Ends]

**Transport for the South East (TfSE) draft response to the DfT Consultation on the New HGV CO2 Emissions Regulatory Framework issued on 6 January 2026.**

**1. Introduction**

- 1.1 Transport for the South East (TfSE) welcomes the opportunity to contribute to DfT's consultation on the new HGV CO2 Emissions Regulatory Framework. This is a draft officer response that will be presented to our Partnership Board on 19 March 2026 for approval. Therefore, a further iteration may follow.
- 1.2 TfSE is the sub-national transport body (STB) for the South East of England. Our principal decision-making body, the Partnership Board, brings together representatives from our 16 constituent local transport authorities, district and borough authorities, protected landscapes, business representatives, Highways England, Network Rail and Transport for London.
- 1.3 We have a vision-led Transport Strategy in place to influence government decisions about where, when and how to invest in our region to 2050. Decarbonisation is one of the five core "missions" set out in the strategy, alongside Strategic Connectivity, Resilience, Integration, and Sustainable Growth.
- 1.4 Our Strategic Investment Plan, which is currently being refreshed, provides a framework for delivering our Transport Strategy, setting out transport infrastructure and policy interventions needed in our region over the next three decades. This is also being refreshed, with development work due to be completed by the end of 2025.
- 1.5 We have also published a Freight, Logistics and Gateways Strategy in 2022, and several freight-related studies. These include: the TfSE Lorry Parking Study, the TfSE Warehouse Provision Study and the TfSE Intermodal Rail Freight Interchange Study. We also manage the Wider South East Freight Forum, whose members include representatives from the freight and logistics sector, England's Economic Heartland, Transport East, ports and airports, DfT, National Highways and local authorities.
- 1.6 Our responses to each of the consultation questions are set out below.

**Q1 – Do you think the Certification Regulation (EU) 2017/2400 should be amended within the UK to align with the 2nd and 3rd amendments, as adopted in the EU?**

TfSE supports aligning the UK's certification framework with the EU's 2022 and 2025 amendments to (EU) 2017/2400. This will ensure that Zero Emission (ZE) technologies and any additional categories can be certified consistently across manufacturers supplying heavy goods vehicles (HGVs) to both Europe and the UK. It will provide regulatory continuity and reduce administrative friction for manufacturers operating in both markets. It also improves the transparency of ZE eligibility criteria when carbon dioxide (CO<sub>2</sub>) based restrictions apply.

**Q2 – What are your views on Option 1 regarding a strengthened and expanded CO<sub>2</sub> standard for HGVs?**

Option 1 will allow manufacturers to reduce vehicle CO<sub>2</sub> emissions through either ZE HGVs or incremental improvements in engine efficiency. The contribution of CO<sub>2</sub> emissions reductions from HGVs could also be weighted proportionally to the vehicle's characteristics, such as payload, mileage, average lifetime, or CO<sub>2</sub> emissions. This will ensure that the vehicles that contribute most to CO<sub>2</sub> emissions meet higher CO<sub>2</sub> standards.

However, it is unlikely that this option alone will enable manufacturers to meet the government's net-zero target by 2040, particularly as it does not cover all HGV types. It will mean that many operators will put off purchasing ZE vehicles because they can meet the CO<sub>2</sub> standards by improving diesel engine performance, for example, through aerodynamics, tyre resistance, and engine efficiency. It also ignores the stricter European standards that most UK-based ZE HGV manufacturers must meet to sell ZE HGVs in Europe. This could lead to confusion and cause manufacturers to invest less in ZE HGVs destined for the UK market, as there is uncertainty about future, stricter regulations that will require the production of ZE HGVs. It could also result in less investment in ZE HGV charging and fuelling infrastructure, as investors also assume less operator take-up of ZE vehicles.

**Q3 – What are your views on Option 2 regarding the introduction of a ZEV mandate limiting the sales of non-ZE HGVs and**

**Q4 – If you agree with using Option 2 as a future framework, should the ZE HGV mandate be accompanied by a CO<sub>2</sub> standard for non-ZE HGV vehicles?**

Option 2 establishes a new regulatory mandate that requires HGV manufacturers to increase their share of ZE HGVs by reducing their share of new non-ZE HGVs sold over a specified period. It will also apply to all HGV

vehicle categories. This is similar to the ZE regulations set out for EV car and van manufacturers in the UK.

Under this option, HGV manufacturers will benefit from the same flexibilities as those offered to car manufacturers, such as credit and debt, banking and borrowing, and trading mechanisms, and potentially some flexibility between ZE HGV and non-ZE HGV requirements.

This will provide manufacturers with some continuity in regulations for the decarbonisation of UK vehicles, and the certainty HGV manufacturers need to invest in ZE HGVs for sale in the UK. It will also encourage private-sector investment in HGV charging and fuelling infrastructure as operators scale up their demand for ZE HGVs. This is important because operators will only lease/buy ZE HGVs if there is sufficient cost-effective and well-sited infrastructure for them to recharge their vehicles. Without this complementary infrastructure, manufacturers may fall short of their targets because ZE HGV supply exceeds the operators' demand.

TfSE supports Option 2 because it will:

- encourage manufacturers to produce more ZE HGVs than those that meet the standard CO<sub>2</sub> emissions standards alone, as set out in Option 1.
- set out clearer ZE HGV uptake trajectories across all HGV categories.
- encourage investment in both UK ZE HGV manufacturing and charging/refuelling infrastructure.

TfSE would also support implementing a CO<sub>2</sub> emission standard with this option. This would preserve incentives for non-ZE HGVs to improve the residual diesel-fleet performance (through aerodynamics, tyres, and engine efficiency) without diluting the primary ZEV HGV target and provide a safeguard while ZE HGV supply scales up.

TfSE also notes that current uncertainties about future HGV demand may pose challenges for manufacturers in meeting their targets under this option and agrees that the government should consider including some flexibility in the final design to reflect these uncertainties.

### **Q5 – What are your views on Option 3 considering requirements for fleets to purchase or lease an increasing share of ZE HGVs?**

While a targeted fleet mandate for very large operators could complement other supply-side measures and help seed a used-ZE market, any such mandate must avoid imposing disproportionate burdens on the SME sector, even though they may operate small fleets of no more than five vehicles. Given the dominance of small to medium enterprise (SME) operators in the sector, this option would need to be delivered with a coherent government

strategy setting out how it expects its target that all new HGVs to be ZE by 2035 for those under 26 tonnes (t), and by 2040 for those over 26t, to be met. This should set out a clear pathway and roles for all relevant stakeholders, including manufacturers, large fleet operators, small operators without fleets, energy suppliers, prospective investors, and developers of charging/refuelling infrastructure facilities. It should also include guidance for the public sector on how to work with stakeholders to support them in meeting the government's target, as well as wider sources of grant funding to support the pathway beyond those currently available. This would provide the certainty that the smaller SME operator market needs to invest in ZE HGVs. However, there has been little of this type of policy support and guidance from the government to date. Also, the current provision of local and public charging facilities is insufficient to support smaller operators who are not in a position, financially or logistically, to supply their own depot-based facilities. Without this support, Option 3 could risk imposing unrealistic expectations on smaller operators and undermining confidence in the wider transition framework.

**Q6 – If you agree with using Option 3 as a future framework, what eligibility criteria should be set to include freight operators in a fleet mandate?**

If introduced, Option 3 should be limited to the largest fleet operators, as they have the financial capacity to invest in ZE HGVs. This option could encourage larger operators to invest faster in ZE HGVs, thereby contributing to a greater reduction in CO2 emissions. It may also encourage operators with larger fleets to adopt ZE HGVs, thereby potentially creating a second-hand market for them in future. In addition, many of the larger fleet operators who would be better placed to comply with this option are already preparing to decarbonise their fleets by 2035 or 2040.

TfSE also notes that this option could include exemptions for operators subject to a fleet mandate who are unable to acquire ZE HGVs. The reasons for this include: a lack of availability of a ZE vehicle capable of performing the duties of a conventional HGV; a demanding duty cycle that a ZE vehicle cannot handle; unforeseen delays in installing charging infrastructure; or the need to replace a vehicle involved in an accident with a conventionally fuelled HGV.

However, Option 3 does little to encourage the uptake of ZE HGVs by SMEs and smaller operators. It may therefore not be appropriate for many of them, as they do not operate sizable vehicle fleets. Even if they operate small fleets, many have already faced financial challenges over the last few years due to driver shortages, supply chain disruptions, and rising fuel prices, leaving them with very little surplus income to invest in ZE HGVs or the required charging

facilities to support them. ZE HGVs also currently have higher initial and total operating costs than their existing diesel vehicles, so requiring small fleet operators to purchase ZE HGVs will create further financial pressures. Therefore, imposing Option 3 on smaller SME operated fleets could further hinder these businesses' ability to expand fleet decarbonisation beyond what is necessary.

**Q7 – If you agree with using Option 3 as a future framework, should a purchasing requirement, fleet requirement, or a combination be established?**

TfSE has no comment.

**Q8 – Of the options presented, what is your preferred approach, or combination of approaches, for reducing emissions from HGVs and delivering a phase-out of new non-ZE HGVs?**

TfSE's preferred option is Option 2, with the inclusion of a CO2 emissions standard. This will support private investment in UK ZE HGV manufacturing, including all types of HGV. It will provide a clear trajectory to meet the government's HGV net zero target by 2040 and encourage greater private investment in HGV charging infrastructure. The addition of a CO2 emission standard will also encourage manufacturers to reduce the CO2 emissions of vehicles still available for sale, until all HGV sales are ZE.

**Q9 – Are there any alternative approaches that the government should consider to reduce CO<sub>2</sub> emissions from HGVs?**

TfSE has no comment.

**Q10 – Do you have any comments on the exclusion of ZE HGVs with a GVW between 3.5 tonnes and 4.25 tonnes from a future HGV regulation?**

TfSE would support the future introduction of a ZE regulation for these vehicles, particularly given the existing strong market for them. TfSE recognises that conventionally fuelled vehicles of this type are harder to decarbonise due to their more demanding powertrain requirements. However, this should not preclude the requirement for these vehicles to be decarbonised. Therefore, more research should be undertaken to find ways to decarbonise these types of vehicles more quickly, even if this only extends to the use of HVO (or similar interim fuels) and potential use of hydrogen fuel cells rather than ZE vehicles in the future.

**Q11 – Do you think a regulatory framework for reducing CO<sub>2</sub> emissions from the HGV sector should be extended to include coaches?**

TfSE supports extending the framework to coaches, particularly as many HGV manufacturers also make coaches. However, greater investment in local

public charging infrastructure will be needed to support this, given the range and operational demands of coaches. Therefore, any regulation must be supported by government guidance and investment to expand local and public charging infrastructure, particularly in tourist areas.

**Q12 – What are your views on a future regulation including CO<sub>2</sub> emission reduction targets for trailers?**

TfSE supports the introduction of measures to reduce CO<sub>2</sub> emissions from trailers, for example, through aerodynamic improvements and the use of low-rolling-resistance tyres. The use of e-trailers should also be encouraged.

**Q13 – Should a derogation or an exemption be given to smaller volume HGV manufacturers in a regulatory framework? If yes, what should that threshold be?**

TfSE supports proportionate derogations/exemptions for small-volume manufacturers with a sunset review to ensure innovation is encouraged. However, clear parity with the larger manufacturers should be maintained to ensure transparency and fairness.

**Q14 – Should an exemption be given to smaller volume coach manufacturers? If yes, please elaborate why and explain what should that threshold be?**

TfSE also supports proportionate, time-limited exemptions, recognising that smaller SME coach manufacturers may be less technology-ready than their counterparts and at a different stage of their transition to ZE manufacturing processes. TfSE does not have a view on the threshold.

**Q15 – Should a sunset clause be set for any derogation? If yes, by what year should this be set?**

If a sunset clause is used in any derogation, then the deadline should not be later than 2050. For each coach or HGV manufacturer, derogations should be reviewed periodically, in line with market information on ZE vehicle availability and the parity between the total operating costs of ZE and non-ZE vehicles. Any derogations should be published.

**Q16 – Should any additional vehicles be exempt from the standards that we have not considered here?**

TfSE has no comment.

**Q17 – What criterion, or combination of criteria, should be used to set the eligibility of a ZE HGV?**

TfSE supports regulations to set criteria to define ZE HGV.

TfSE would support the combined criteria of the first and third options as set out:

- 1) "A ZE HGV may be defined as any vehicle with no internal combustion engine."
- 3) "Grams of pollutants per vehicle activity (g/km) – the Euro VI standards establish a testing procedure and limits for various pollutants, including nitrogen oxides, particulate matter, and carbon monoxide."

This uses engine-technology criteria consistent with ZEV definitions for cars/vans, but extends them to include hydrogen fuel-cell engines. Battery-cell-powered HGVs are unlikely to meet the more demanding powertrain requirements, whereas hydrogen-fuel-cell-powered HGVs will. Therefore, any criteria will need to include both.

The third criterion would enable hydrogen fuel cell-operated HGVs to be included in such a way to ensure that the manufacturers can meet common criteria used by all the markets in which their vehicles are sold. This will provide certainty for HGV manufacturers, rather than forcing them to invest in different types of vehicle technologies depending on which market they sell to. This combination would also include all ZE vehicles, rather than leaving some excluded. This also makes the definitions consistent, transparent, clear, and easy to understand.

**Q18 – For vehicles not covered under the scope of the Certification Regulation, what criterion, or combination of criteria, should be used to set the eligibility of a ZE HGV?**

Where the Certification Regulation does not cover vehicles, TfSE would support the application of the technology-based definition above, for example, including battery- and fuel-cell ZE engines, to ensure consistency and administrative simplicity until certification methods are extended.

**Q19 – For your preferred criterion, or combination of criteria, what eligibility threshold do you propose? Why?**

TfSE's preferred eligibility threshold for a ZE HGV is for battery-electric or monofuel hydrogen combustion vehicles. While the latter combusts hydrogen, we accept that they may also produce small amounts of CO<sub>2</sub> emissions due to byproducts of the engine system and from the burning of lubricating oil. This threshold would ensure a substantial reduction in CO<sub>2</sub> emissions and respect the diversity of ZE technologies.

Including a dual-fuel hydrogen-diesel combustion vehicle would lead to continued increases in CO<sub>2</sub> emissions from diesel combustion. Therefore, these vehicles cannot be defined as ZE vehicles.

**Q20 – Do you agree with maintaining the VECTO vehicle category segmentation? If not, what alternative segmentation would you suggest?**

TfSE agrees that maintaining the Vehicle Energy Consumption Calculation Tool (VECTO)<sup>1</sup> categorisation will ensure continuity with manufacturer processes and complementarity with EU standards. However, a roadmap should be developed to incorporate those vehicle categories not already included.

**Q21 – What metric should be applied as a weighting system for a particular vehicle grouping?**

TfSE supports a weighting that, for example, accounts for the higher emissions of larger, high-mileage diesel-engined HGVs.

**Q22 – Which flexibilities do you think should be established under a future HGV regulation?**

TfSE agrees that there should be some flexibility in any regulation that depends on customer demand. However, we believe the extent of flexibility should be agreed between the manufacturers and the DfT. It should consider the manufacturers' prior experience with variable demand and the overall limited demand for HGVs. The detail needs to provide sufficient room for short-term changes in demand and serve as an incentive for manufacturers to produce sufficient ZE HGVs to reduce CO<sub>2</sub> emissions. Some guardrails should be considered to avoid over-reliance on producing the less stringent ZE HGV categories and to allow cross-manufacturer ZE credit trading within set limits, thereby supporting compliance.

**Q23 – What is your preferred option for credit transfer? If there is an alternative option you would like to have considered, please elaborate here.**

TfSE supports asymmetric transfers that favour the hardest-to-decarbonise categories, for example, credits from heavier, long-haul HGVs could flow to lighter, short-haul vehicle groups, but not vice-versa beyond a predefined limit. This focusses attention on vehicles that emit higher CO<sub>2</sub> levels.

**Q24 – Do you have any comments on the level and provision of penalties and enforcement in a future HGV regulation?**

TfSE supports penalties that are appropriate for the manufacturer's size, predictable, and set at a level high enough to ensure compliance.

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<sup>1</sup> Vehicle Energy Consumption Calculation Tool) is a mandatory European Commission software used to simulate and certify emissions and fuel consumption for HGVs. It categorises vehicles based on axle configuration, body type, and Gross Vehicle Weight Rating (GVWR) to apply appropriate simulation models. More information can be found here: [VECTO](#).

Enforcement processes should be clear and published to ensure a common understanding across all manufacturers. Data on compliance levels should also be shared to maintain market confidence.

**Q25 – Which VECTO groups should be included in the 2035 phase out dates, and which should be included in the 2040 phase out dates?**

TfSE agrees that the government target for HGVs should be mapped onto the VECTO groups as set in the consultation document. This ensures clarity and consistency. The government's HGV target sets out that all new HGVs up to 26 tonnes must be net-zero by 2035, and all those over 26 tonnes must be net-zero by 2040.

Any exemptions for specialist vehicles should be clearly defined and regularly reviewed.

**Q26 – For your chosen regulatory option, what target trajectory do you think should be set?**

All major manufacturers have announced that between 45 and 60 per cent of their 2030 sales will be zero-emission HGVs, and three manufacturers have committed to selling only zero-emission HGVs from 2040. In addition, all major manufacturers have signed the ACEA pledge to end sales of fossil-fuelled HGVs by 2040. The market direction of travel is therefore clear.

Within TfSE's preferred Option 2, three broad trajectories could be adopted:

- a) Maintain the existing UK trajectory, requiring all new HGVs up to and including 26 tonnes to be zero emission by 2035 and all new HGVs over 26 tonnes to be zero emission by 2040.
- b) Align with the EU 27 staged CO<sub>2</sub> reduction targets, requiring reductions of around 45 per cent by 2030, 65 per cent by 2035, and 90 per cent by 2040 relative to the relevant base year.
- c) Follow the Climate Change Committee pathway under the Seventh Carbon Budget, which implies around one third of the HGV fleet to be battery electric by 2035, rising to around two thirds by 2040.

Given the scale of manufacturer commitments and the need for regulatory clarity, we support adopting the EU-staged reduction trajectory, while retaining the UK's existing 2035 and 2040 end-of-sale commitments for non-zero-emission HGVs

The UK should therefore set reduction targets of at least 45 per cent by 2030, 65 per cent by 2035, and 90 per cent by 2040, alongside confirmation that the 2035 phase-out for HGVs up to and including 26 tonnes and the 2040 phase-out for all new HGVs remain fixed.

This approach provides three advantages. First, it aligns the UK with the principal regulatory framework facing manufacturers, reducing complexity and investment risk. Second, it preserves the clarity of the UK's existing phase-out milestones. Third, it introduces a meaningful 2030 milestone, which is essential to bring forward fleet renewal decisions and unlock timely investment in depot charging, grid reinforcement, and refuelling infrastructure.

There is a risk that interim ambition could outpace infrastructure readiness. However, that risk is better addressed through accelerated enabling measures and coordinated infrastructure planning than by weakening the regulatory signal.

**Q27 – If a ZEV mandate is your preferred option, should a CO<sub>2</sub> improvement target also be set for the non-ZE HGV fleet? If so, please elaborate.**

TfSE agrees that a CO<sub>2</sub> improvement target should be included in the ZEV mandate. This could be the same as the current CO<sub>2</sub> emissions set out by the government under the retained EU law (EU) 2019/1242). This would ensure continuity and consistency, and can be used while the market share of ZE HGVs increases. It also complements the government's current ZE HGV pathway.

**Summary**

In summary, TfSE supports:

- A framework centred on a ZEV mandate for HGVs, supported by CO<sub>2</sub> emission improvement targets for the remaining diesel fleet, and reflects operator readiness and financial constraints. This framework offers consistency, clarity, and common standards for the sector, thereby supporting compliance.
  - This option also offers a more ambitious framework for decarbonising HGVs than the CO<sub>2</sub> emissions-target-only option,
  - provides stronger encouragement for ZE HGV and
  - recharging/refuelling infrastructure manufacturers to invest in the UK or export to it, and provides a framework applicable to all vehicle categories.
- A criterion for a net zero HGV vehicle is one which may be defined as any vehicle with no internal combustion engine, and a vehicle which only emits Euro VI standards for pollutants, including nitrogen oxides, particulate matter, and carbon monoxide, to allow the definition to include hydrogen fuel-cell battery-operated HGVs.

- The introduction of regulations for all HGV vehicles, including coaches and those that are harder to decarbonise, although the trajectory for both to deliver net zero emissions may be longer than that for HGVs.
- Reduction targets of at least 45 per cent by 2030, 65 per cent by 2035, and 90 per cent by 2040, alongside confirmation that the 2035 phase-out for HGVs up to and including 26 tonnes and the 2040 phase-out for all new HGVs remain fixed. This approach provides three advantages: first, it aligns the UK with the principal regulatory framework facing manufacturers, reducing complexity and investment risk; second, it preserves the clarity of the UK's existing phase-out milestones; and third, it introduces a meaningful 2030 milestone, which is essential to bring forward fleet renewal decisions and unlock timely investment in depot charging, grid reinforcement, and refuelling infrastructure.