

**Mobility and Access Committee for Scotland (MACS)**

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By Email: To: Department of Transport and Office for Low Emission  
Vehicles

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Dear Sir

Consultation on ending the sale of new petrol, diesel and hybrid cars and  
vans

Please see below MACS (Mobility and Access Committee Scotland)  
response to the consultation, prepared by Keith Robertson, Lead on the  
Roads, Infrastructure and Active Travel Workstream.

Yours Sincerely



Keith Robertson  
Workstream Lead, Roads Infrastructure and Active Travel

## 1. The phase out date

The phasing out of the sale of new diesel, petrol and hybrid motor vehicles, early indicators would suggest costs may be prohibitive. The designs of electric vehicles have not lent themselves to the needs of disabled people (accessibility, storage space for equipment, fitting of hoists, etc). Consequently, we have some concerns that everyone's needs are taken into consideration.

Given the proposed reduction in diesel and petrol vehicles we would ask if this includes CNG (compressed natural gas), ethanol and flex fluid propulsion, biodiesel and propane?

Given the present lack of investment and research into forms of propulsion other than electric we do wonder if the date for the phasing out of diesel and petrol propelled vehicles may be ambitious unless research into other forms of propulsion are increased immediately.

## 2. The definition of what should be phased out

MACS fully supports the climate change agenda, however, we do have some concerns that, due to affordability and vehicle design, disabled people will be left with older and unreliable vehicles that are not fit for purpose, in that, a vehicle being used by disabled people must be first and foremost reliable and cost-effective.

If this proposed policy includes taxi and private hire vehicles there could be considerable financial restrictions to the providers of these services and as a consequence this could have a serious effect on the availability of accessible vehicles for hire by disabled people.

## 3. Barriers to achieving the above proposals

We believe that the biggest barriers to the proposals at present is the lack of research and investment in the likes of CNG, ethanol, Flex fluid, biodiesel, hydrogen and propane driven vehicles.

Also, given the drive to reduce reliance on oil and fossil-based fuels will this also include carbon propulsion?

It would seem that at present most of the research and investment is being spent on electric vehicles and we would strongly suggest that if we end up relying solely on electric propulsion we will have failed in trying to replace petrol and diesel propelled vehicles with more efficient and effective methods of vehicle propulsion.

#### 4. The impact of these ambitions on different sectors of industry and society

As already alluded to, it would seem that there is more investment and research going into electric propulsion than other alternative forms. This poses very specific problems for many disabled people. Example: Vehicles that are not powered by internal combustion tend to be smaller and less accessible for disabled people. Further, the larger vehicles tend to be much more expensive and as a consequence would not be available, nor cost effective, to the majority of disabled people.

Scotland's AVES (Accessible Vehicles and Equipment Scheme) and Motability account for around 620,000 vehicles for disabled people across the UK (<https://www.gov.scot/news/vehicles-to-meet-disabled-peoples-needs/>)

The only non-internal combustion vehicles available are electric and most are simply not accessible for the majority of disabled people. The design of the vehicle doesn't meet the needs of those who need to carry equipment such as wheelchairs and mobility scooters and for those living in rural Scotland given the battery range (and potential battery anxiety, which has been recognised as a contributor to many people not making the shift to electric).

The development of vehicles with non-internal combustion propulsion must be accessible for disabled people and, further, disabled people must have a voice in determining the design of such vehicles. It has been proven many times that if disabled people have a voice in the design of facilities that affect them the results is that they are more accessible for everyone and fit for purpose.

It is also important that vehicles with other methods of propulsion can be heard, especially for people who have a sight impairment, deafblind, wheelchair users or people who are of smaller stature (this list not exhaustive).

People who have a sight impairment rely on being able to hear an oncoming vehicle especially when trying to cross the road. The same is true for most wheelchair users who tend to be lower to the ground and as a result cannot see over parked vehicles so rely on being able to hear oncoming vehicles.

The need for people to be able to hear oncoming vehicles is also true for many older people and children.

MACS believes that it is imperative that disabled people are involved in not only the design of vehicles but also the implementation of all policies designed to advance the climate change agenda, whether this is for cars for individual peoples use or for service vehicles.

In brief, therefore, we feel that it is imperative that opportunities for engagement for disabled people are created to enable engagement with manufacturers of vehicles that are not driven by petrol or diesel.

Already mentioned in question 2 the knock-on financial restrictions could have an impact on the availability of hiring Taxi or PHV car hire accessible vehicles for disabled people.

5. What measures are required by government and others to achieve the earlier phase out date

Both Westminster and devolved governments must prioritise engagement with disabled people to ensure that they are not disadvantaged when introducing policies to address the climate change agenda.

Governments must ensure that opportunities for disabled people to engage with manufacturers and designers are not only made available but are a priority.

**Governments must look further afield than electric propulsion and look at other means by how cars and other vehicles can be propelled if we are to truly address the climate change emergency.**

**MACS suggestss that further and immediate research and development must go into hydrogen, flex fluid propulsion (especially ethanol and methanol) and biofuels.**

**Government must also put in place, or indeed replace, fuelling stations or a range of fuelling systems to replace the present petrol and diesel filling stations and in doing so ensure that these stations/premises are accessible for everyone.**

**Further, disabled people should and must be included in the design of these new fuelling stations and methods of refuelling all of which must also be accessible.**

**It is also of paramount importance that the cost of other methods of propulsion is at least comparable with the current price of diesel and petrol, if not cheaper.**

**It is also imperative that the government ensures that the cost of the actual vehicles are affordable for everyone, including those on low or restricted incomes, who without their reliance on a motor car will find themselves in dire needless isolation that will have a considerable effect on the mental health and wellbeing of disabled people and older people, which in turn will have a knock-on effect of increasing the availability for mental health services within the NHS.**

**In conclusion, therefore, MACS fully supports the climate change agenda but we believe that there are many hurdles yet to overcome. If the target date is 2035 then we only have a short time to address the many barriers and challenges that exist. As such, meaningful engagement and consultation with disabled people needs to start now.**