

Written Evidence Submitted by Woodall Nicholson Ltd

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Reference: ENV/2025/008267 Bus Services (No.2) Bill: Call for Evidence

1. Introduction

1.1 This written evidence is submitted in response to the Bus Services (No.2) Bill call for evidence. It addresses key issues related to zero-emission transition strategies and their implications for smaller, rural, and community-based bus services.

1.2 Woodall Nicholson Ltd is a UK-based manufacturer of specialist and low-floor minibuses, with significant expertise in supporting community and rural transport providers. We offer this evidence based on our operational knowledge, customer base, and engagement with decarbonisation strategies across transport networks.

2. Overarching Concern

2.1 Current zero-emission vehicle (ZEV) strategies are heavily focused on large, urban bus networks, often overlooking smaller operators in rural and community settings.

2.2 This submission argues for a diversified approach to decarbonisation, which includes electric vehicles (EVs) but also supports alternative fuels such as hydrogen, biogas, and biodiesel.

3. Key Issues and Recommendations

3.1 Infrastructure Accessibility and Distribution

3.1.1 Issue: Small operators lack depot-based infrastructure; they often use informal/shared sites.

3.1.2 Recommendation: Government should fund distributed charging/refuelling points suitable for dispersed operators.

3.1.3 Justification: In areas with weak grid infrastructure, alternatives like hydrogen or biofuels provide flexible, short- to medium-term solutions (Rural ZEB Taskforce Report, 2023).

3.2 Grid Limitations in Rural Areas

3.2.1 Issue: Grid upgrades in remote areas are costly, slow, and politically sensitive.

3.2.2 Recommendation: Avoid over-reliance on electrification in rural policies. Support interim fuel solutions.

3.2.3 Justification: Biodiesel or renewable gas can be deployed more quickly where electrification is infeasible (Great Britain Electricity Network Infrastructure Review, 2023; Orkney Islands Grid Access Case Study).

3.3 Operational and Economic Constraints

3.3.1 Issue: Councils and social enterprises face higher capital costs and limited resources.

3.3.2 Recommendation: Simplify and target grant schemes. Fund conversions to low-emission fuels for existing fleets.

3.3.3 Justification: Conversions are more cost-effective for low-usage fleets than total replacements. Minibuses in rural settings, often operating with limited passengers, offer high social return with lower financial outlay (Mike Parker, West Oxfordshire Community Transport, 2023).

3.4 One-Size-Fits-All Mandates

3.4.1 Issue: National ZEV mandates do not reflect the realities of rural operations.

3.4.2 Recommendation: Implement flexible policies that allow multiple decarbonisation technologies.

3.4.3 Justification: Hybrid, hydrogen, or renewable fuels may be more viable in specific local contexts (Zemo Partnership & DfT Low Carbon Fuels Strategy, 2022).

3.5 Social Value and Community Mobility

3.5.1 Issue: Small bus services play a critical role in social inclusion and access.

3.5.2 Recommendation: Factor social value into funding models and policy decisions.

3.5.3 Justification: Supporting community transport with any clean fuel source aligns with equity goals (A Green Bus for Every Journey, CPT & LowCVP, 2021).

3.6 Mixed-Fuel Strategies

3.6.1 Issue: Electric-only approaches are inadequate for legacy vehicles and seasonal/low-frequency services.

3.6.2 Recommendation: Encourage a mixed-fuel strategy in national planning.

3.6.3 Justification: Flexibility ensures broader participation in the transition to net zero. BSOG Plus funding illustrates the potential of targeted support for ZEV uptake but also highlights the need for greater access for rural operators (BSOG+ Data, Department for Transport, 2024).

4. Summary of Recommendations

- Provide distributed infrastructure support for non-depot operators.
- Recognise alternative fuels as legitimate interim solutions.
- Simplify and tailor funding for rural and community operators.
- Ensure mandates are adaptable to different operator profiles.
- Value the social function of rural transport services.
- Promote mixed-fuel approaches to support decarbonisation diversity.

5. Conclusion

5.1 Electrification is an essential part of the net zero transition, but it must not be treated as a one-size-fits-all solution.

5.2 We urge the committee to adopt a more flexible, inclusive framework that supports alternative fuels in areas where electric deployment is limited.

5.3 We welcome the opportunity to further engage with the committee, consultants, or stakeholders on this matter.

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