

Update to alternatively fuelled and zero emission 4.25t vehicle regulations

Briefing note

The following briefing highlights the rules and regulations surrounding the use of alternatively fuelled vehicles (AFV) and zero emission vehicles (ZEV), between 3.5t and 4.25t maximum authorised mass (MAM), as a result of the changes introduced by The Motor Vehicles (Driving Licences) (Amendment) (No.2) Regulations 2025 as well as changes introduced by The Goods Vehicles (Testing, Drivers' Hours and Tachographs etc.) (Amendment) Regulations 2026.

Also included are changes in Northern Ireland introduced by The Motor Vehicles (Driving Licences) (Amendment No. 2) Regulations (Northern Ireland) 2026 which came into effect from 1 August 2026. In Northern Ireland, zero emission vehicles are referred to as zero emission goods vehicles (ZEGV).

Background

In July 2018, the government laid legislation¹ that allows a holder of a category B driving licence to drive an AFV not exceeding 4.25t, provided that it is not driven outside of Great Britain. This was further supported by legislation² exempting such vehicles from operator licensing. Note however, that the law was changed in 2018 regarding electric vehicles not meeting the definition above. In this case the exemption from operator licensing was then only applicable to those in use before March 2015.

This came into force on 29 April 2019 and required a driver wishing to take advantage of the concession to undertake a minimum of five hours of training. In addition, the vehicle could only be used for the transportation of goods and could not tow a trailer.

A consultation outcome on driving licence flexibility for AFVs was published in October 2023. Responses to the consultation highlighted an 'absence of evidence to support the need for training' with the Department for Transport (DfT) and the Office for Zero Emission Vehicles confirming that the government will legislate to remove the legislative training requirement. Note that there are still obligatory training requirements under Health and Safety legislation.

A Statutory Instrument³ laid before Parliament in February 2025 proposed to remove the need for category B licence holders to undertake five hours additional training before operating 4.25t ZEVs and allow the same towing capabilities as internal combustion engine (ICE) equivalents, with the changes taking effect from 10 June 2025 in Great Britain.

Then in January 2026 the DfT confirmed a draft Statutory Instrument⁴ had been laid down in Parliament to introduce the regulatory flexibilities for ZEVs up to 4.25t that Logistics UK had requested in the 2025 consultation. *The Goods Vehicles (Testing, Drivers' Hours and Tachographs etc.) (Amendment) Regulations 2026* became law in Great Britain on 1 June 2026.

¹ The Motor Vehicles (Driving Licences) (Amendment) Regulations 2018.

² The Goods and Motor Vehicles (Miscellaneous Amendments) Regulations 2018 amended the Goods Vehicles (Licensing of Operators) Regulations 1995 and the Motor Vehicles (Tests) Regulations 1981.

³ The Motor Vehicles (Driving Licences) (Amendment) (No.2) Regulations 2025.

⁴ The Goods Vehicles (Testing, Drivers' Hours and Tachographs etc.) (Amendment) Regulations 2026.



The full GB regulations can be found here:

<https://www.legislation.gov.uk/ukxi/2026/501/contents/made>

Definition of ZEVs and AFVs

For the purpose of the original concession, the definition of 'alternative fuel' meant one or more of the following:

- Electricity.
- Hydrogen.
- Natural gas, including biomethane in gaseous form and liquified form.
- Liquified petroleum gas.

The June 2025 driving licence amendment regulations³ introduced into legislation a changed legal ZEV definition: *"a vehicle without an internal combustion engine, or with an internal combustion engine that has emissions of CO₂ of zero grams per kilometre"*. The changes to the Northern Ireland legislation reflect this with the same wording.

This confirmed that ZEVs such as hydrogen fuel cell and battery electric vehicles, with zero emissions, are included in the driving licence changes. However, an AFV such as a gas or hybrid vehicle, which produces emissions of CO₂, are not included in the driving licence changes.

This has introduced deviations between the rules for operator licensing and driving licences. To further confuse things, the pending introduction of testing, drivers' hours and tachograph amendment regulations⁴ in Great Britain will also include and align with the new ZEV definition.

Operator licensing

Both AFVs and ZEVs are exempt providing they are fuelled entirely by alternative fuels, have a MAM not exceeding 4.25t and currently operated in Great Britain. The general operator licence exemption for electrically propelled vehicles of all weights only applies to fully electric vehicles in use before 1 March 2015 following an amendment to plating and testing regulations in 2017⁵.

Annual testing

AFVs and ZEVs over 3.5t up to 4.25t (vehicle category N2) were subject to annual testing (MOT) in their first year after initial registration and then annually thereafter. The introduction of testing, drivers' hours and tachograph amendment regulations⁴ in Great Britain means that ZEVs are now treated the same way as the equivalent 3.5t ICE vehicle. ZEVs will move into the Class 7 MOT scheme and will no longer be subject to heavy vehicle roadworthiness testing.

AFVs remain subject to HGV annual testing requirements, and the changes do not apply in Northern Ireland.

Driving licence

An AFV between 3.5t and 4.25t requires the driver to hold a minimum of category C1 to drive it. ZEVs of the same weight can be driven on a category B licence. In Northern Ireland, the legislation allows a Category B licence holder to drive a ZEGV up to 4.25t, provided they have held the licence for at least two years.

Driver certificate of professional competence

Driving a ZEV on a category B licence, the driver is not in scope of Driver CPC. If driving an AFV under category C or C1 licences, Driver CPC will be required.

Drivers' hours and tachograph rules

⁵ The Goods Vehicles (Plating and Testing) (Miscellaneous Amendments) Regulations 2017.

The introduction of testing, drivers' hours and tachograph amendment regulations⁴ in Great Britain means that ZEVs up to 4.25t are exempt from tachograph and assimilated drivers' hours rules. These changes do not apply in Northern Ireland.

Trailers

Currently ZEVs used in Great Britain can tow trailers up to a combination MAM of 7t, in line with the current category B+E driving licence regulations.

The introduction of testing, drivers' hours and tachograph amendment regulations⁴ in Great Britain means that ZEVs and combinations with trailers, from 3.5t up to 4.25t, will be exempt from the scope of The Community Drivers' Hours and Recording Equipment Regulations 2007. This means any ZEV, or one combined with a trailer up to a combined weight of 4.25t, will not require a tachograph and will not need to operate under assimilated hours.

Any ZEV up to 4.25t that has a trailer attached, taking the combination over 4.25t but not over 7.5t, will still need to have a tachograph fitted and operate under assimilated hours. There is an exemption if the combination remains within 100km radius from which the undertaking is based and the vehicle is propelled by natural or liquified gas or electricity.

Note that unlike in Great Britain, drivers in Northern Ireland have not had the B+E category automatically added to their licence and must still pass the test in order to tow a trailer over 750kg and will still be bound by the assimilated drivers' hours rules unless an exemption applies.

Speed limiters

Legislation requires speed limiters to be fitted to heavy goods vehicles (HGV) over 3.5t. Speed limiters restrict the maximum powered vehicle speed to 90kph (56mph) in the case of HGVs which includes AFVs and ZEVs over 3.5t.

The introduction of testing, drivers' hours and tachograph amendment regulations⁴ does not affect this and speed limiters will still be fitted and form part of the MOT to both AFVs and ZEVs exceeding 3.5t.

Summary of requirements from 1 June 2026 in Great Britain

Application	3.5t (ICE)	4.25t (AFV)	4.25t (ZEV)
Operator licensing	X	X	X
Class 7 MOT from third year, then annually	✓	✓	✓
HGV MOT from first year, then annually	X	✓	X
Minimum category B driving licence	✓	X	✓
Minimum category C1/C driving licence	X	✓	X
Driver CPC	X	✓	X
Drivers' hours and tachograph rules	X	✓ [†]	X [‡]
Trailers	✓ [‡]	✓ [‡]	✓ [‡]
Speed limiters	X	✓	✓

[†] Unless another exemption applies. [‡] Tachograph rules may apply.

Northern Ireland

Introduced by *The Motor Vehicles (Driving Licences) (Amendment No. 2) Regulations (Northern Ireland) 2026*, Category B licence holders in Northern Ireland, who have held their category B licence for a period of more than two years will be able to:

- Drive ZEVs up to MAM of 4.25t. This increases up to 5t MAM if the ZEV has specialist equipment fitted for the carriage of disabled passengers.
- Tow a trailer with a MAM not exceeding 750kg provided the ZEV plus trailer combination does not exceed 5t.
- Drive a ZEV and trailer combination provided the MAM of the trailer does not exceed 5 tonnes and the vehicle and trailer combination does not exceed 7t MAM. This is only possible where the driver has passed the Category B+E test.