

Green-plating zero emission vehicles

UK Green Number Plates Consultation Response

December 2019

The green number plate [proposal](#) by the UK Department for Transport provides a worthwhile nudge to the growing market for electric vehicles complementing other more important initiatives to encourage purchase like the plug-in car grant and benefit in kind company car tax breaks. The battery electric car market is [growing strongly](#) and is expected to reach over 3% in 2020 and approaching 7% in 2021. Initially the green plate will clearly differentiate ZEV's and their drivers providing a visible signal of their socially responsible choice enhancing the appeal of the technology. Over time, the number of green plates will increase illustrating the normalisation of the technology. Growing the market for BEVs as quickly as possible in the UK will not only have environmental benefits but make the UK a more attractive location to manufacture the vehicles creating economic and employment opportunities. As speed is of the essence Transport and Environment (T&E) UK therefore support most of the Department for Transport proposals that facilitate a fast introduction with light touch regulation. On specific points of detail T&E UK agree that the green plate should:

- Only be available to zero emission vehicles – these are the only models that can help deliver the net zero commitment. The plate should not be available to plug-in hybrid or hybrid vehicles that still burn fossil fuels.
- Not be mandatory but should be opt out and be available to existing qualifying vehicles on the road. There are a wide range of number plate designs allowed under UK regulations and this consistent with the current approach. Displaying the plate should not be imposed on people that do not wish to.
- Only provide an indication that a vehicle is zero emission and as such only provides a soft enforcement mechanism. The alternative approach would be open to fraud and be counterproductive for local incentives to encourage ZEVs.

T&E UK strongly disagrees that the plate should not be available for buses, coaches and heavy duty vehicles (HDV). No credible explanation is given and the proposal entirely ignores that many businesses are keen to demonstrate their green credentials as a means to differentiate themselves. A green number plate on commercial and public service vehicles would do this for fleet operators that select ZEVs. The final proposal must include these categories of vehicles and could also be extended to Non-Road Mobile Machinery where number plates are required (like Tractors) and category L vehicles (like quad bikes and quadricycles). It is however essential that the strict criteria of only genuinely zero emission vehicles is retained for all categories of vehicles ensuring gas vehicles are excluded.

There are also a number of areas in which the consultation itself falls short. Specifically:

- The DfT should have tested the fully green design with ANPR rather than speculate as to the effectiveness of the system with an entirely green plate.
- There appears to have been no consumer testing of alternative designs – this seems to be a basic requirement to assess the appeal of different options and assess preferences
- No alternative to light touch regulation and soft enforcement is included in the consultation – it is therefore not impossible to compare different approaches.
- The consultation is misleading as no option requires a lengthy redrafting of the British Standard before it can be implemented. All standards are voluntary unless specified in regulation and the implementing regulation could state the required criteria lifted from the current Standard updated for a green background. Policy changes should not be dictated by the pace at which non statutory standard setting bodies can work.
- The lack of a combined design including both the green flash and national notation makes it difficult to judge whether this is a credible solution or not.
- The questionnaire does not permit comments to be added where the response is “Yes” or “Don’t Know” although some respondents would want to qualify their answer.

Despite the limitations of the consultation itself T&E UK urge the Government to press forward quickly with the introduction of the green number plates. However, in doing so Ministers should recognise the proposal will only have a marginal impact on public perception and therefore sales of ZEVs. The proposal should not therefore be considered in any way an alternative to strengthening support for the purchase of zero emission vehicles in other ways such as:

1. Continuing with the plug-in grant – T&E has [proposed](#) reform of the first year VED scheme in order to continue to fund grants in an equitable way.
2. Bringing forward the target to end sales of all ICE vehicles to the early 2030’s and setting a more ambitious 2025 CO2 target for cars and vans.
3. Guaranteeing new BEV buyers the right to charge in the vicinity of their home as well as strengthening the ultra-fast charging network and regulating to require car park operators to progressive equip parking places with appropriate charging points.
4. Introducing a zero emission truck mandate.

These measures will drive both the supply and demand for ZEVs to a far greater extent than the proposed green number plate scheme.

Further Information

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