

# Green number plates for ultra low emission vehicles

## Introduction

Thank you for responding to the 'Green number plates for ultra low emission vehicles' consultation.

Your responses will help decide the introduction of green number plates for ultra low emission vehicles (ULEVs) including the:

- eligibility
- design
- rollout
- enforcement

We suggest you read the full consultation document which contains the background information and proposals in full.

The closing date for responses to consultation is 14 January 2020.

## Confidentiality and data protection

The Department for Transport (DfT) is carrying out this consultation to decide on the introduction of green number plates for ultra low emission vehicles including the:

- eligibility
- design
- rollout
- enforcement

This consultation and the processing of personal data that it entails is necessary for the exercise of our functions as a government department. If your answers contain any information that allows you to be identified, DfT will, under data protection law, be the controller for this information.

As part of this consultation we're asking for your name and email address. This is in case we need to ask you follow-up questions about any of your responses. You do not have to give us this personal information. If you do provide it, we will use it only for the purpose of asking follow-up questions.

If you are responding for an organisation we will ask for the organisation name.

[DfT's privacy policy](#) has more information about your rights in relation to your personal data, how to complain and how to contact the Data Protection Officer.

Your information will be kept securely and destroyed within 12 months after the consultation has been completed. Any information provided through the online questionnaire will be moved to our internal systems within 2 months of the consultation end date.

## Personal details ✓

### 1. Your name and email address (only used if we need to contact you).

Your name

Your email

### 2. Are you responding as: \*

an individual? (go to 'Our proposals')

✓  on behalf of an organisation?

## Organisation details

### 3. Your organisation's name is?

## Our proposals

This consultation is into how the green number plates should be delivered and sets out government's initial view and reasoning on a range of aspects of the policy, inviting comment on these matters including:

- eligibility
- design
- rollout
- enforcement

Our aim with this approach is to focus the response of industry and the public, to ensure an outcome that is deliverable and minimises risk for other important policy areas.

The green number plate scheme must secure and maintain credibility, and the trust and confidence of stakeholders and the public. This means it must:

- minimise risk to other policy areas
- be futureproofed so that it does not get outdated by market change
- be deliverable within existing structures and contexts, and in timescales that are appropriate to capture the growing ULEV market

## Eligibility for green number plates

Our proposed position is that eligibility should be set at zero emission vehicles only (e.g. full battery or hydrogen fuel cell electric). This is due to being simple and transparent, and very easy for consumers to understand. It incentivises the cleanest vehicles, and would be futureproofed against rapid technology change, staying effective as a strong communications and behavioural tool to support the 2040 policy objectives.

### 4. Do you agree with our proposal that only zero emission vehicles would be eligible for green number plates?

- Yes (Go to 'Plate design')
- No
- Don't know? (go to 'Plate design')

## Against only zero emission vehicle eligibility

### 5. Why not, including what requirement you think would be more suitable instead and why?

## Plate design

Our proposed position is for a green design on the left hand side of the number plate. This is because:

- of the risks to Automatic Number Plate Recognition (ANPR) cameras and problems associated with the reduced contrast of a full green background
- designs on the left hand side of the plate are more easily implemented and so more likely to be able to be brought in sooner

Our initial preference is for the design on the left hand side of the plate to be a green flash rather than a green symbol, as it creates a more dominant identifier.

Design concepts for a:

- full green background with black characters is shown at figure 1
- green flash on the left hand side of the number plate is shown at figure 2
- green symbol on the left hand side of the number plate is shown at figure 3

Figure 1



Figure 2



Figure 3



6. Do you agree with our proposal that the green number plate design should be restricted to the left hand side of the number plate?

- Yes (Go to 'Plate design')
- No
- Don't know? (Go to 'Plate design')

## Against left hand design placement

7. What you think would be more suitable and why?

## Plate design

8. For the design on the left hand side of the number plate, do you think this should be:

- a green flash? (Go to 'Plate design')
- a green symbol? (Go to 'Plate design')
- something else?

## Alternative symbol design

9. Specify your other ideas for the design using the left hand side of the plate (attach any plan or files for your design with your return).

Comments:

## Plate design

10. Should the left hand design be displayed in addition to national flags and lettering that can occupy that area of the plate?

- Yes (Go to 'Rollout')
- No
- Don't know? (Go to 'Rollout')

## Against other emblems and letters

11. What other views and reasoning on the design of the green number plates do you feel should be considered?

## Rollout

We propose that:

1. the requirement for green number plates is non-mandatory
2. when green number plates are supplied it must be done on a customer opt out basis

**12. Do you agree with our proposal that the green number plates should not be mandatory?**

- Yes (Go to 'Rollout')
- No
- Don't know? (Go to 'Rollout')

## Against non-mandatory requirement

**13. What you think would be more suitable and why?**

## Rollout

**14. Do you agree with our proposal that the green number plates should be opt-out?**

- Yes (Go to 'Rollout')
- No
- Don't know? (Go to 'Rollout')

## Against opt-out

**15. Why not, including what requirement you think would be suitable?**

## Rollout

We propose that green number plates would be available to qualifying:

- cars
- vans
- taxis
- motorcycles

but not apply to:

- buses
- coaches
- heavy good vehicles

Whilst we are not ruling out that green number plates could be applied to heavy vehicles in the future, they currently present a different proposition.

**16. Do you agree that green number plates should be available to:**

	Yes	No	Don't know?
cars	✓	<input type="checkbox"/>	<input type="checkbox"/>
vans	✓	<input type="checkbox"/>	<input type="checkbox"/>
taxis	✓	<input type="checkbox"/>	<input type="checkbox"/>
motorbikes	✓	<input type="checkbox"/>	<input type="checkbox"/>

Why?

**17. Do you agree that green number plates should not be available to:**

	Yes	No	Don't know?
buses	✓	<input type="checkbox"/>	<input type="checkbox"/>
coaches	✓	<input type="checkbox"/>	<input type="checkbox"/>
heavy goods vehicles	✓	<input type="checkbox"/>	<input type="checkbox"/>

Why?

Energy Saving Trust would support the introduction of green number plates for buses, coaches and HGVs in the future, following a more detailed review on appropriate eligibility criteria and the available incentives.

We propose the introduction of green number plates would be available to both new and existing qualifying vehicles.

**18. Do you agree that after the introduction of the plates both new and existing qualifying vehicles should be able to access them?**

- Yes (Go to 'Enforcement')
- No
- Don't know? (Go to 'Enforcement')

## Against rolling out for new and existing vehicles

**19. Why not?**

## Enforcement

Our proposed policy position is for a light touch scheme that fits into the existing number plate landscape in the UK and can be delivered in appropriate timeframes to support policy goals. This means:

- national enforcement would fall under the existing enforcement landscape around the supply and display of licence plates
- formal local enforcement around accessing local incentives would be likely be via the local authority reading vehicle plates through ANPR and checking vehicle details

We are exploring both of these aspects further.

Under this proposed approach there would be no material benefit from local incentives by displaying a green number plate, unless you had a qualifying vehicle. Our suggested practice to local authorities would be that display of green number plates should not be mandatory for eligible vehicles accessing any local incentive policies they decide to bring in.

**20. Do you agree with our proposal to seek a light touch scheme that can be implemented more quickly so as to capture the emerging ULEV market?**

- Yes (Go to 'Enforcement')
- No
- Don't know? (Go to 'Enforcement')

## Against the light touch approach



21. Why not, including what approach you think would be suitable with your reasons?

## Enforcement

22. Do you agree with our proposal that the scheme should fit into the existing regulatory and enforcement landscape around the supply and display of eligible plates?

- Yes (Go to 'Soft enforcement')
- No
- Don't know? (Go to 'Soft enforcement')

## Against regulatory and enforcement proposal

23. Why not?

## Soft enforcement

24. Do you agree that green number plates should only be used as an identification aid, and that enforcement of local authorities' incentives will require other means (likely via ANPR reading of the plate characters and checking vehicle details)?

- Yes (go to 'Costs')
- No
- Don't know? (go to 'Costs')

## Against soft enforcement mechanism

25. Why not, including what approach you think would be suitable?

## Costs

### 26. What are your views, if any, about the expected costs of implementing this policy?

We would expect that replacement number plates and fitting would cost the driver approximately £30 per vehicle. However, some dealerships or retail sites may offer to replace number plates at a reduced price within a wider package of servicing or repair work to attract new business.

## Final comments

### 27. Any other comments?

The continuation of the plug-in car grant and other financial incentives beyond 2020 is highly important as these grants have a strong and direct influence on EV sales, both for fleets and consumers. The introduction of green number plates would have a complementary, but not an equivalent, impact.

There is a map of local incentives for EVs on the Go Ultra Low website. Energy Saving Trust was responsible for its design and ongoing data collection from local authorities.  
<https://www.goultralow.com/local-incentives-tool/>

To assist local authorities with the hard enforcement of any local incentives, and other parties such as the emergency services, it would be beneficial to share statistics periodically on the opt-out rate by drivers of eligible vehicles. A higher than expected opt-out rate would be a cause for concern.