

MAYOR OF LONDON

Office for Low Emission Vehicles consultation:

The Introduction of Green Number Plates for Ultra Low Emission Vehicles

January 2020

1. Overview

- 1.1. As part of the Mayor's ambition for London to become a zero-carbon city, the Mayor's Transport Strategy (MTS) sets a target for all road transport in London to be zero emission by 2050. This requires a major shift to walking, cycling, and public transport and for all remaining road vehicles in London to have zero exhaust emissions and be supplied with zero carbon energy.
- 1.2. We therefore welcome the opportunity to respond to this consultation and we support any initiative that encourages a switch to the cleanest vehicles, but we are concerned the proposals in this consultation risk detracting from making real progress towards zero carbon. We need to be more ambitious.
- 1.3. It will only be possible to bring about a zero-carbon city by 2050 if all vehicles have zero exhaust emissions by that date. The Government's aim for all new cars and vans to be zero emission from 2040 is not ambitious enough, and should be accelerated to ensure that all new cars and vans are zero emission from 2030, with all new heavy vehicles from 2040.
- 1.4. It is also clear that without stronger regulations on charging infrastructure, greater certainty on consumer incentives and more targeted funding for local authorities, we will not be on track to deliver the uptake necessary to meet the Government's own net zero target.
- 1.5. In summary, our position is that
 - Green number plates should be reserved for zero tailpipe emissions only. We agree that this would incentivise the very cleanest vehicles and would be simple to implement, enforce and for consumers to understand.
 - Green number plates should be mandatory because a voluntary arrangement would undermine the aim of the policy and lead to too many discrepancies.
 - The policy should apply to all vehicle types, including buses, otherwise it will be an obligation on individuals but not the public and private sector.
 - The policy is time critical and should be introduced as soon as possible because its benefits are only realised before mass market uptake happens.
 - The Government should be clear that increasing bus use is essential to achieving its carbon goals and that local enforcement schemes allowing vehicles with green number plates in bus lanes would be very detrimental by undermining reliability. There is strong evidence that when speeds and reliability drop, passenger numbers fall.

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2. Consultation response

1. Eligibility

Q1a: Do you agree with our proposal that only zero emission vehicles would be eligible for green number plates?

We support the proposed policy that only zero emission at tail-pipe vehicles are eligible for green number plates, to incentivise uptake of the cleanest vehicles.

2. Design

Q2a: 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. This would make Automatic Number Plate Recognition easier.

Q3a: For the design on the left hand side of the number plate, do you think this should be:

- a green flash?
- a green symbol?
- something else?

We would support a green flash because this is more prominent.

We would also welcome a plate design that is similar to existing designs in other countries, to help with international recognition and consistency.

3. Rollout

Q6a: Do you agree with our proposal that the green number plates should not be mandatory?

Green number plates should be mandatory if implemented.

The proposed policy prefers green plates to be voluntary, but owners can opt out. If the policy is adopted, all clean vehicles must have a green plate; otherwise recognising green vehicles will be difficult as not all vehicles will have a green plate – undermining the aim of the policy.

It is not clear from the consultation proposals if people would have to pay to get their plate replaced with a green one. We would recommend they should not, as there would be less incentive to replace plates if this were ultimately a voluntary scheme.

Q6c: Do you agree with our proposal that the green number plates should be opt-out?

See response to Q6a.

Q7a: Do you agree that after the introduction of the plates both new and existing qualifying vehicles should be able to access them?

Yes.

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Q8a: Do you agree that green number plates should be open to qualifying cars, vans, taxis and motorbikes, but that buses, coaches and HGVs are out of scope?

No.

Q8b: If you disagree, explain why, including what you think would be more suitable?

Buses, coaches and HGVs should be included, otherwise it will be seen as a scheme forced on individuals but not for the public and private sector.

4. Enforcement

Q9a: Do you agree with our proposal to seek a light touch scheme that can be implemented more quickly so as to capture the emerging vehicle market?

Yes. We agree that a light touch scheme implemented in the timescales set out could support an important transition phase to electric vehicles in the early 2020s.

Q10a: 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. However, the proposals indicate enforcement will fall to local authorities. Appropriate resources should be considered to support local authorities. This should include ensuring that registration data is updated to clearly show whether a vehicle is eligible for a green plate.

Q12a: Do you agree that the visual characteristics of green number plates should only serve as a soft enforcement mechanism?

Yes. Green number plates would make it more conspicuous when vehicles are compliant with electric vehicle designated bays. This could encourage the switch to electric vehicles and help change the behaviour of those ignoring the designation. However, green number plates would not impact the enforcement process as this is conducted using license plate data.