

# 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.

## **Response to *Green number plates for ultra low emission vehicles* consultation**

**Submitted by:**

# PATROL

PATROL (Parking and Traffic Regulations Outside London)  
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# About PATROL

**The PATROL (Parking and Traffic Regulations Outside London) Joint Committee comprises 313 local authorities in England (outside London) and Wales.**

The principal function of the Joint Committee is to make provision for independent adjudication in respect of appeals against penalties issued for traffic contraventions by enforcement and charging authorities in England (outside London) and Wales. Adjudication is delivered through the **Traffic Penalty Tribunal (TPT)**. TPT adjudicators are wholly independent lawyers, appointed with the consent of the Lord Chancellor, and are supported by a small team of administrative staff, who provide customer support. The TPT is the UK's first fully online tribunal and decides ~25,000 cases a year.

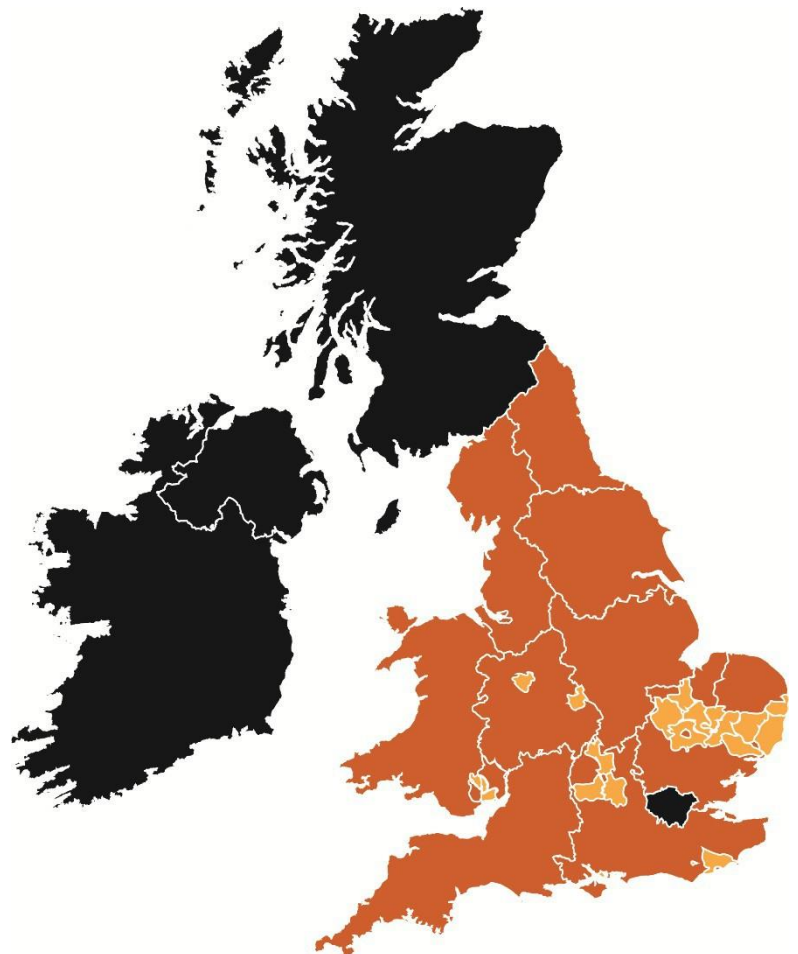
The Adjudicators decide appeals against civil enforcement penalties issued by authorities for parking, bus lane, littering from vehicles and (in Wales only) moving traffic contraventions, as well as appeals arising from road user charging enforcement (including from the Dartford-Thurrock River Crossing, Mersey Gateway Bridge Crossings and the Durham Road User Charge Zone). It is anticipated that from 2020, road user charging appeals arising from charging Clean Air Zones will be determined by the TPT Adjudicators.

PATROL represents its member authorities on traffic management issues of mutual interest, whilst also taking into account the motorist's perspective – as seen through appeals to the TPT.

PATROL also promotes best practice in public information to increase understanding of traffic management objectives. This includes the annual PARC (Parking Annual Reports by Councils) Awards held at the House of Commons.

PATROL member authorities comprise each type of local authority and a spectrum of political allegiances – a representative voice on civil traffic enforcement outside London, through the sharing of issues, insight, evaluation and best practice from a broad and diverse geographic area.

**(Right) Authority coverage in orange; lighter shade reflects authorities where civil enforcement is not in operation.**



## 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 outbasis

**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?**

If one of the purposes is to raise awareness of zero emission vehicles, a mandatory process would achieve this more effectively, as all such vehicles would be required to be visible.

## 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
vans	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
taxis	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
motorbikes	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Why?

**For reasons stated in 13 and for consistency across all classes of vehicle.**

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

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

Why?

**The proposal wishes to plan for the long term; future developments for a range of vehicles should be provided for. One of PATROL's local authority members has already indicated its desire to restrict bus operation solely to electric vehicles in specific locations.**

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?

## Final comments

27. Any other comments?

The definition of 'ultra low emission' needs to be consistently applied across all enforcement schemes to avoid confusion for motorists, and resulting representations and appeals.

Currently, there will be a varied landscape of eligibility criteria for vehicles entering proposed charging Clean Air Zones (CAZs), Ultra Low and Zero Emission zones across the country, so the proposed green number plate and its eligibility criteria needs to be simple to understand.

However, the green plate could not be a single determinant of eligibility to enter CAZs, as areas may not be restricting eligibility to ultra low emission vehicles. The current process of ANPR enforcement and vehicle registration mark capture would need to continue for these schemes.

Furthermore, as number plates are not currently secure items, produced by a range of suppliers and rely on police enforcement, enforcement authorities will still need to use the vehicle registration mark to determine the class of vehicle for CAZs, etc.

**In terms of public awareness, PATROL anticipates that there will be a national publicity campaign, as well as local campaigns, ahead of the roll-out of charging CAZs later this year. With such a varied and complex mix of eligibility criteria for these schemes, the effectiveness of public information at a national and local level, together with awareness through scheme design and signage will be vital to maintain public engagement and support. Raising awareness of the eligibility criteria for green number plates should be integrated with this.**

**Ultimately, adjudicators of the Traffic Penalty Tribunal will determine the outcome of road user charging appeals arising from civil penalties issued by local authorities enforcing such zones.**