



Office for Low Emission Vehicles (OLEV)
Introduction of green number plates for
ultra-low emission vehicles

Response from:

British Vehicle Rental and Leasing Association

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Bona-fides

BVRLA, the industry and its members

- Established in 1967, the British Vehicle Rental & Leasing Association (BVRLA) is the UK trade body for companies engaged in vehicle rental and leasing.
- BVRLA membership provides customers with the reassurance that the company they are dealing with adheres to the highest standards of professionalism and fairness.
- The association achieves this by maintaining industry standards and regulatory compliance via its mandatory codes of conduct, inspection programme and conciliation service. To support this work, the BVRLA shares information and promotes best practice through its extensive range of training and events.
- On behalf of its 1000 members, the BVRLA works with governments, public sector agencies, industry associations and key business influencers across a wide range of road transport, environmental, taxation, technology and finance-related issues.
- BVRLA members are responsible for a combined fleet of over five million cars, vans and trucks, supporting around 465,000 jobs and contributing £49bn to the economy each year. For more information, please visit www.bvrla.co.uk.

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Introduction

The British Vehicle Rental and Leasing Association (BVRLA) represents over 1000 members in the vehicle rental and leasing sector. BVRLA members and their customers are collectively responsible for over 5 million vehicles on UK roads, purchasing around 50% of new vehicles sold annually in the UK, including a third of all new electric and hybrid vehicles, making the fleet sector crucial to decarbonising emissions in road transport.

BVRLA members have the cleanest cars on the road with 100% of the car rental fleet and 96% of leased cars being Clean Air Zone (CAZ) compliant, compared to the average for all UK cars where only 62% meet CAZ requirements. The role of leasing and renting in decarbonisation is even more prominent in the commercial vehicle sector where only 21% of the UK van fleet is CAZ-compliant compared to 47% of all leased vans and 88% of the rental van fleet.¹

In 2018, the sector pledged to increase its plug-in fleet to 720,000 by 2025 by when it will be registering 300,000 per year.

The BVRLA welcome moves by the Government to encourage and incentivise the purchase and use of electric vehicles. We are calling on the Government to continue the Plug-In Car and Van grants to support the uptake of EVs as sales remain slow but can also see the value in localised incentives that also encourage people to switch to cleaner transport. These in-life incentives will support those looking to invest in second hand zero emission vehicles and those trialling cleaner transport via rental and car clubs.

If green number plates are to act as a mechanism to support uptake it is imperative that this is supported by wider benefits such as access to bus lanes, subsidised parking etc. However, if the management of incentives is to be done locally then it is crucial that there is guidance and funding for local authorities from central government which ensures consistency in approach and which provides local authorities with the capability to provide such benefits, especially if these are to be managed by technology such as ANPR which could be expensive to install/administer.

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

The BVRLA supports the Department for Transport's recommendation that green number plates should be restricted to vehicles with zero tailpipe emissions only because it will be easy for local authorities to enforce and vehicle operators to understand and abide by. This also means that the standard of vehicle required for a green number plate can be maintained in the long-term.

¹ BVRLA Fleet Sustainability Credentials 2019

However, it is important to stress that the road to zero emission must be phased, providing businesses and individuals with the opportunities and incentives to upgrade to less polluting vehicles, including hybrids.

A typical Battery Electric Vehicle costs around £10,000 more than its petrol or diesel equivalent and waiting times for some of the most popular models are already at nine or twelve months due to a lack of availability. Therefore, it is vital that incentives for hybrids and other non-electric less-polluting vehicles are pursued, in addition to the green number plate initiative. It is within this context that the removal of the hybrid plug-in grant in 2018 was particularly disappointing.

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?

Q2b: If you disagree, explain why, including what you think would be more suitable?

A priority for the BVRLA and its members is that there are no risks to the ANPR system from the new green number plate initiative. However, members are concerned that a green flash or symbol on the left-hand side of the number plate would not be sufficiently clear. International alignment with regards to the electric vehicle identifier and national flags and lettering on the number plate would support operators who drive abroad.

The preference of BVRLA members would be either Option 2) a green background on the left hand-side of the plate or green lettering like the example below.



An example of green lettering used to identify an electric vehicle in Canada.

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?

Of the designs on the left-hand side of the number plate, the green flash is the most suitable as it covers the largest area of the number plate and would therefore be the most visible of the two. It also provides some consistency with the initiatives of other countries, who have introduced green backgrounds. Please refer to answer above at 2b for preferences on design.

Q4a: Should the left-hand design be displayed in addition to national flags and lettering that can occupy that area of the plate?

The BVRLA propose that if a green flash is introduced on the left hand-side of the number plate, that this acts as the background to the relevant country flag and lettering. This would prevent any potential issues with international travel created by moving the national flags and lettering.

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

BVRLA members support the recommendation of a non-mandatory but opt-out system as it allows drivers and operators to choose not to have a green number plate if they think it will create any barrier to their operations, for example, when driving abroad.

Under this approach, local and central government would need to ensure there are sufficient incentives for green number plate owners in order to encourage drivers not to opt-out and to realise the benefits of increased awareness and acceptance of ULEVs intended.

However, a mandatory system would not be a problem for members providing it was appropriately controlled and non-green vehicles with green credential plates were suitably penalised.

Q6b: Do you agree with our proposal that the green number plates should be opt-out?

Yes. If the buyer of an electric vehicle needs to opt-in to owning a green number plate, there is a reduced chance of the change making an impact on UK roads and increasing the general awareness of the benefits of using electric vehicles.

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

Yes. The green number plate system and associated benefits and incentives should be used to the advantage of both new and existing qualifying vehicles. The more vehicles displaying the number plate the increased likelihood of the scheme incentivising others.

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?

The BVRLA agree that HGVs are out of scope for this initiative because of the lack of availability of electric vehicle technology for HGVs on the mass market. However, given central Government commitments to electrifying buses as part of its all-electric bus towns scheme, the BVRLA believe it would be feasible to include buses and coaches in the scope of the initiative.

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. Incentives to encourage the purchase, leasing and renting of electric vehicles should be introduced as soon as possible to promote their uptake and capitalise on the expanding market. Considering the demands on the legislative system due to EU exit, a light touch scheme with as little legislative and regulatory change would be the most suitable and beneficial to consumers.

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. The BVRLA support amending the Display Regulations to incorporate eligibility for green number plates.

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

The BVRLA support using a formal enforcement mechanism to qualify electric vehicles for any local benefits or incentives, however, there is a concern that not all local authorities will have the necessary infrastructure to support this. In areas without the necessary infrastructure it may be more suitable for those with green number plates to apply for discounts and benefits offered via the Council.

The Consultation document notes the work being done by the eight Go Ultra Low Cities to encourage residents and businesses to switch to plug-in vehicles. However, to implement the recommended local policy measures such as access to bus or low emission vehicle lanes, electric charging bays, free or reduced rate parking or ultra-low emission zones which may be reliant on an extensive ANPR network then local authorities will need appropriate support from central Government.