

TravelWatch NORTHWEST

Tel 07807 768124
 Email: admin@travelwatch-northwest.org.uk
 Website: www.travelwatch-northwest.org.uk
 Correspondence address – 11 Harvelin
 Park, Todmorden, OL14 6HX

Winner of CILT award for best practice in passenger transport (2013)

promoting quality public transport.....

Office for Low Emission Vehicles (OLEV),
 Great Minster House,
 33 Horseferry Road,
 Westminster,
 London
 SW1P 4DR

9th January 2020

Dear Officers,

Consultation on The Introduction of Green Number Plates for Ultra-low Emission Vehicles

TravelWatch NorthWest (TWNW) is an independent Community Interest Company representing all public transport users in North West England.

We strongly support the wider use of low emission and electric vehicles. We would also support the introduction of green number plates to easily identify them. We have no preference for the method of display although Figure 2 may offer a good compromise.

We support the position that eligibility should be restricted to vehicles that have zero tailpipe emissions (e.g. full battery electric or hydrogen).

Importantly, we strongly oppose these vehicles being permitted to use bus lanes or any other form of bus priority because this would impact on bus journey times and reliability. As the number of electric vehicles increases the impact on bus services would get worse. ***It is more important from an environmental and road congestion standpoint to maintain and improve bus services to encourage users to change mode to public transport rather than to change vehicles to low emission.***

Our specific responses as follows -

Eligibility

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

Yes

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

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?

Green flash preferred

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

No preference

Q5a: What other views and reasoning on the design of the green number plates do you feel should be considered

No comments

Rollout and approach

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

Yes

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

Yes

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?

Yes, but this should not impede progress towards reducing their pollution

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

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

Q11a: Do you agree that the visual characteristics of green number plates should only serve as a soft enforcement mechanism?

Yes

Q13: Any other comments?

As stressed in our introduction, green number plates should not provide any exemption from any bus lane regulations or other bus priority regulations including bus stop clearways.

Thank you for the opportunity to respond

Yours sincerely

John A Moorhouse

John Moorhouse
Company Secretary