

LGA submission to Introduction of green number plates for ultra low emission vehicles

14 January 2020



About the Local Government Association (LGA)

The Local Government Association (LGA) is the national voice of local government. We work with councils to support, promote and improve local government.

We are a politically-led, cross party organisation which works on behalf of councils to ensure local government has a strong, credible voice with national government. We aim to influence and set the political agenda on the issues that matter to councils so they are able to deliver local solutions to national problems.

Summary

The LGA is supportive of efforts to increase the uptake of low emission vehicles. We do not have specific comments to make on the behavioural aspects of these proposals and how strong that effect will be. We have focussed our comments on the implementation problems we foresee for any incentive schemes that councils might offer. We do however welcome and support the idea that any incentive programmes and benefits for green number plates should be locally determined.

Detailed Response

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?

Given that transport is the biggest emitter of carbon emissions in the UK it makes sense that the Government supports using the current framework as it makes it simpler to implement and will allow the scheme to be introduced quickly, thus encouraging more rapid uptake of zero emission vehicles. However it will also limit the scope and effectiveness of the scheme as councils are currently severely constrained in their use of ANPR technology in parking. There are limitations on council's use in car parks because statutory guidance recommends that camera technologies are only used where enforcement by issuing PCN to the driver or attaching them to the vehicle is difficult or impossible, for example when a vehicle attempted to drive away, where a civil enforcement officer was being intimidated by the driver or where the movement of vehicles was such that it was dangerous. This has now been extended as set out in the Deregulation Act and statutory guidance. For the Government preferred proposal to have maximum impact, it is important that councils are able to make fuller use of ANPR technology for parking enforcement.

Q10b: If you disagree, explain why, including what you think would be more suitable?

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Submission

Not allowing councils to use ANPR technology in their parking will limit the rollout of this incentive. Councils have long called for a level playing field in the operation of their car parks and the private sector. If there are going to be parking incentives for these vehicles they are likely to come from councils. Councils are able to vary parking charges by engine type if it delivers improvements in air quality. For private providers the cost of a space will not be differentiated by engine type as the cost to them as a provider does not change.

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

We have outlined the problems with the use of ANPR for parking incentives; we would also point out the lack of Traffic Management Act Part 6 powers (moving traffic offences) outside of London. This means there is little or no camera infrastructure in other areas of the country to control access for any incentive schemes. This will again limit the potential for substantial incentive schemes.

Q12: Please provide any other views around the expected cost of implementing this policy

The success of this policy will be partially dependent on the scope of the incentives that can be offered for cars displaying a green license plate. Whilst we welcome the commitment to allow areas to determine the best approach to incentivising the transition to electric vehicles the scope of the incentives will be limited by the funding that we have available to deliver such policies.

Councils are struggling to address a decade of reductions in their budgets and increasing demand for statutory services. Promoting the electrification of vehicles is a new and discretionary area of spend. Whilst councils would acknowledge its importance, this limits the scope of many authorities to consider new incentive schemes.