

## Category B driving licence derogation

### *Regulatory changes to support the take-up of alternatively-fuelled light commercial vehicles*

The Natural Gas Vehicles Network (NGV Network) is an established trade body which represents a diverse range of businesses involved in the production of gas-derived fuels and gas-powered vehicles, particularly heavy goods vehicles. Given that air pollution, and related preventable deaths, are at unacceptably high levels, the work of our members is vital in developing the next generation of cleaner transport fuels and vehicles.

The NGV Network is one of the six divisions of the Energy and Utilities Alliance (EUA). Energy and Utilities Alliance (EUA). A company limited by guarantee and registered in England. Company number: 10461234, VAT number: 254 3805 07, registered address: Camden House, 201 Warwick Road, Kenilworth, Warwickshire, CV8 1TH.

#### 1. Can you explain and quantify any benefits (e.g. economic, environmental) that the proposed policy would bring?

We believe that the proposed changes to weight restrictions for alternatively-fuelled vehicles are a sensible change that will remove a barrier to the uptake of cleaner alternatives, particularly at the heavier end. Just as the amendments to permissible weights and dimensions last year enabled the market for alternatively-fuelled vehicles to overcome unnecessary restrictions on their development, these proposals will encourage fleet operators and businesses to take up these vehicles.

These proposals could contribute to significant economic and environmental benefits from increased uptake of gas HGVs in particular. Diesel HGVs currently contribute a disproportionate amount of the UK's transport emissions and pollutants; despite driving only 5% of vehicle miles travelled and constituting 2% of registered vehicles, they emit 16% of road transport greenhouse gas emissions and 21% of NO<sub>x</sub> emissions. These emissions have an economic cost in lost productivity through avoidable health complications which also lead to an increase in government spending on healthcare.

Proposals such as these will help to unshackle the gas HGV market which would deliver significant environmental benefits due to large emissions savings and the shorter typical life of an HGV compared to cars; testing from one leading vehicle manufacturer revealed that Euro VI gas HGVs can deliver an impressive reduction of 96% on particulates and 78% on NO<sub>x</sub> emissions compared to the Euro VI diesel standard. Their cleaner credentials can also be boosted with a cut in CO<sub>2</sub> emissions of as much as 100 tonnes per vehicle if renewable biomethane is used.

Increased investment in the gas HGVs market would also enable Britain to become a world leader in this technology, boosting economic growth in the transport sector at the same time as making strides towards our emissions reduction targets.

2. Can you explain and quantify any disadvantages (e.g. economic, environmental) that the proposed policy would bring?

We do not believe that this policy change would bring any disadvantages. The administrative costs for the Government and its agencies would not be increased and the vehicles included in the scope of these proposals are all electric vehicles or gas-powered meaning that there could only be benefits in environmental terms given the types of vehicle they will be replacing.

*We have no comments to make on the remaining consultation questions.*