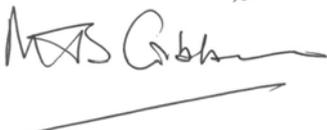


 Regulatory Policy Committee	OPINION	
Impact Assessment (IA)	The Cleaner Road Transport Vehicles Regulations 2011	
Lead Department/Agency	Department for Transport	
Stage	Final	
Origin	Domestic	
Date submitted to RPC	16/02/2011	
RPC Opinion date and reference	28/03/2011	RPC11-DfT-0814
Overall Assessment	RED	
<p>The IA is not fit for purpose. The range of estimated net benefit is so wide as to be difficult to consider robust. The Department does not provide sufficient basis or analysis for the expected, best estimate and so it is not clear what the actual level of benefit of the proposal will be.</p>		
<p>Identification of costs and benefits, and the impacts on small firms, public and third sector organisations, individuals and community groups and reflection of these in the choice of options</p>		
<p><i>Best Estimate.</i> It is not obvious how the best estimate has been determined. Given that switching to cleaner vehicles would provide a net financial benefit to local authorities, it is not obvious why it should be assumed that only 50% of authorities switch, as it would make economic sense to do so. The IA should explain in further detail how the best estimate figure has been derived. If there are such large benefits to be obtained It is not clear what is preventing all authorities obtaining a benefit from the proposal</p> <p><i>Vehicle Replacement.</i> The IA does not appear to take into account the ‘natural’ replacement rate of vehicles that will occur in any case. Though the IA mentions a certain element of inertia with respect to vehicle replacement (i.e. procurers often choose ‘like for like’ vehicles), the advancement in vehicle technology could mean that subsequent purchases of the same vehicle type may be cleaner in any case. If so, the stated benefits may be optimistic.</p>		
<p>Have the necessary burden reductions required by One-in, One-out been identified and are they robust?</p>		
<p>As this proposal is of European origin, with no evidence of going beyond minimum requirements, it is out of scope of One-in, One-out.</p>		
<p>Signed</p> 	<p>Michael Gibbons, Chair</p>	