



Department
for Transport



Department for

Infrastructure

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Consultation:

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

July 2017

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Contents

Foreword	4
Background	5
Proposals.....	8
Consultation Questions.....	19
How to Respond	21
Annex 1 Consultation Principles	23
Annex 2 Consultation Terms.....	24

Foreword

We need to reduce CO₂ emissions from all forms of road transport, including vans, in order to meet national carbon reduction targets set out in the Climate Change Act. We also need to tackle the most pressing problem of nitrogen dioxide air pollution hotspots in our towns and cities. Vans spend much of their time completing driving routes around our towns and cities, and over 96% of them are diesel powered.



We are promoting the uptake of cleaner and more efficient vans, but cleaner powertrains can increase a vehicle's weight, potentially reducing the available payload.

To help overcome this potential barrier to the take-up, the Government is proposing to allow an adjustment in the weight categorisation for vehicle driving licences. This would allow category B (car) licence holders to drive a slightly heavier vehicle, if it is powered by a low emission technology, effectively offsetting the additional weight of the powertrain. The Government is also proposing a similar exemption from operator licensing requirements for alternatively-fuelled vans used for own account haulage. This would help operators to avoid becoming subject to the full operator licensing regime if they invest in cleaner but slightly heavier vans. Simultaneously, we need to ensure that vehicles with cleaner powertrains are run and operated on our roads safely, so we are proposing to correct a regulatory anomaly, which means that electric vans are currently exempt from MOT testing.

This consultation seeks your views on UK legislation which originates from European Union legislation and I would encourage all stakeholders to make their voices heard. The Government is carefully considering all the potential implications arising from the UK's exit of the EU. Until we leave, EU law will continue to apply in the UK alongside national rules. The process for leaving the EU and determining our future relationship will be a complex one, so time will be needed to think through the UK's objectives

and approach. Responses to the questions set out in this consultation will help us to decide whether, and if so how, to take forward these proposals. I look forward to hearing your views.

A handwritten signature in black ink that reads "Jesse Norman". The signature is written in a cursive style with a large initial 'J' and a long, sweeping underline.

Jesse Norman MP
**Parliamentary Under Secretary of State for Roads, Local Transport and
Devolution.**

Background

- 1.0 The Climate Change Act 2008 requires an 80% reduction in greenhouse gas (GHG) emissions by 2050 (from 1990 levels). In 2014 transport accounted for 23% of UK GHG emissions. In addition to this the UK Government has a manifesto commitment to ensure that almost every car and van is a zero emission vehicle by 2050.
- 1.1 Road transport, in particular diesel vehicles, is also the largest source of nitrogen dioxide air pollution in the local areas of greatest concern. The Government has recently consulted on a revised plan¹ to tackle nitrogen dioxide hotspots within the shortest possible time, in line with the Air Quality Regulations 2010 and equivalent legislation in Scotland, Wales and Northern Ireland. Measures which encourage a switch from conventional (diesel and petrol) to ultra low emission vehicles can play a role in helping to achieve this outcome.
- 1.2 We want to establish low emission light commercial vehicles (LCVs - including vans) as a genuine alternative to conventional powertrains, helping to improve air quality in our towns and cities and meeting our legal obligations under the Climate Change Act and the Air Quality Regulations. LCV growth continues to be faster than any other vehicle market, rising 4.2% in 2015 (from 2014 levels). As we encourage more low emission LCVs on to our roads, we need to ensure that they are operated safely.
- 1.3 The Office for Low Emission Vehicles (OLEV) has already made significant strides in helping to promote the uptake of ultra low emission LCVs through incentives such as the plug-in van grant. The grant offers consumers up to 20% of the cost of an eligible N1 category van, up to a maximum of £8,000. In autumn 2016 the grant was extended to include eligible N2 and N3 category vehicles as well as the existing N1 category eligible LCVs.²

¹ <https://www.gov.uk/government/news/new-air-quality-plan-published-for-consultation>

² Category N motor vehicles have at least four wheels designed and are constructed for the carriage of goods. Category N1 vehicles have a maximum authorised mass not exceeding 3,500kg. Category N2 vehicles have a maximum authorised mass exceeding 3,500kg but not exceeding 12,000kg.

- 1.4 Alternatively-fuelled vehicles, predominantly battery electric and fuel cell electric vehicles, have an increased kerb weight³ compared with their conventionally-fuelled counterparts. For road safety reasons, a number of regulations apply to vehicles with a maximum authorised mass⁴ above 3,500kg. This can have the effect of constraining the potential payload, if the operator wishes to remain below this regulatory threshold. This can be accentuated for alternatively fuelled vehicles if their kerb weight is increased. This can create a payload penalty which puts operators of cleaner LCVs at a commercial disadvantage compared to operators of equivalent conventionally-fuelled vehicles.
- 1.5 The threshold for moving from a category B (car and van) licence to a category C1 (lighter goods vehicle) licence is 3,500kg maximum authorised mass. The need for the driver to hold a category C1 licence represents a significant increase in costs (up to £1,200 per driver) to the business. These costs are derived from: upfront licence acquisition, higher salaried drivers, compulsory medical examinations and training for a driver certificate of professional competence (DCPC). We are keen to ensure that firms which choose to use alternatively-fuelled vehicles do not pay a regulatory penalty for doing so, provided that these vehicles do not pose a greater risk to road safety.
- 1.6 It should be noted that Proposal 1, set out below, is to be applied to the whole of the United Kingdom (this includes the devolved administrations of Scotland, Wales and Northern Ireland). Proposals 2 and 3 would only be applied to Great Britain (this includes the devolved administrations of Scotland and Wales).

Category N3 vehicles have a maximum authorised mass exceeding 12,000kg.

³ Kerb Mass / Unladen Mass (Weight): The weight of the vehicle when it is not carrying any passengers, goods or other items. It includes the body and all parts normally used with the vehicle when it's used on a road. This includes the weight of the fuel or, if it's an electric vehicle, the batteries.

⁴ Maximum Authorised Mass (MAM) / Gross Vehicle Weight (GVW): The weight of a vehicle including the maximum load that can be carried safely when it is being used on the road. This is also known as permissible maximum weight.

Proposals

Proposal 1: To increase the weight limit of alternatively-fuelled vans that can be driven on a category B driving licence in the United Kingdom

2.0 We propose to seek a temporary derogation from the European Union third Driving Licence Directive (2006/126/EC) to allow alternatively-fuelled vehicles up to a maximum authorised mass of 4,250kg to be driven on a category B driving licence within the United Kingdom.⁵

2.1 The fuels that would be included in the derogation are: Electricity (for use by Battery Electric Vehicles (BEV), Range Extended Vehicle (REV), Plug-in Hybrid Electric Vehicles (PHEV)), Hydrogen (for use by Fuel Cell Electric Vehicles (FCEV)), natural gas in the forms of Compressed Natural Gas (CNG) and Liquefied Natural Gas (LNG) and its biogenic equivalent biomethane, and Liquefied Petroleum Gas (LPG), and its biogenic equivalent, bioLPG.

Q1: Can you explain and quantify any benefits (e.g. economic, environmental) that the proposed policy would bring?

Q2: Can you explain and quantify any disadvantages (e.g. economic, environmental) that the proposed policy would bring?

⁵ The European Commission only grants a temporary derogation for Pilot schemes as Member States evaluate their effectiveness. There is due to be an evaluation of the third Driving Licence Directive which might lead to a formal relaxing of the rules. However, it is not yet clear whether the UK will or will not continue to be bound by those rules.

Impacts on road safety

- 2.2 A driver who has category B entitlement is permitted to drive a 3,500kg vehicle carrying no more than 8 passengers plus a driver with a trailer of up to 750kg, and is therefore entitled to drive a combination of up to 4,250kg. These drivers can also drive a combined weight of car and trailer up to 3,500kg i.e. 2,000kg and 1,500kg trailer. Additionally, drivers who passed a test before 1 January 1997 and have “C1E (107)” printed on their licence may drive a vehicle and trailer combination up to a maximum authorised mass of 8,250kg, within the UK.
- 2.3 We have found no evidence to suggest that vehicles with a mass of 4,250kg are significantly more difficult to drive than 3,500kg vehicles. Therefore we would not expect the frequency of accidents involving these vehicles to materially change when compared with 3,500kg vehicles. The additional weight from alternatively-fuelled propulsion systems is likely to be centred around the chassis or underneath the cab, rather than high up in the load space, which should minimise any negative impacts on handling and manoeuvrability. However, it is recognised that the increased mass of a 4,250kg vehicle could potentially make vehicles more damaging if involved in a collision. A full impact assessment will be conducted following this consultation to determine the full extent of likely environmental benefits and safety risks.
- 2.4 In addition, we consider that an alternatively-fuelled vehicle with a maximum authorised mass of 4,250kg is likely to be no less safe or stable than a vehicle and trailer combination already permitted under current regulations. We have considered the behaviour of a trailer during a collision, which may slew out and reduce the full weight of impact or arc and widen the potential area of collision. Under the proposals set out in this consultation, drivers will not be permitted to use a trailer of any size or weight in combination with vehicles benefiting from the derogation.
- 2.5 The regulations governing the Driver Certificate of Professional Competence (DCPC) do not require anyone with a category B licence to hold the certificate. This means any drivers using the derogation for alternatively-fuelled vehicles will no longer be within the scope for needing the CPC to operate these vehicles.

- 2.6 We acknowledge that there may be a heightened risk of road accidents relating to medical issues or driver incompetence, which would normally be accounted for in a category C1 (or higher) driving test. However, the derogation is primarily expected to benefit larger operators, due to the higher upfront cost of low emission vehicles combined with the derogation being on a temporary basis (5 years), which is shorter than the average vehicle life for many smaller, own-account operators. Large commercial operators generally impose vehicle competency testing and medical declarations on their drivers. As a result we do not expect there to be significant risk to road safety in increasing the weight limit.
- 2.7 It is expected that drivers using the derogation would generally be undertaking urban drive cycles. Such vehicles tend to travel at slower speeds, thereby reducing the severity and impact of any collisions.

Q3: What are your views on the safety implications of the proposed policy, including drivers of alternatively-fuelled vehicles at 4,250kg no longer being within the scope for holding the Driver Certificate of Professional Competence (DCPC)?

Q4: What are your views (e.g. on the economic, environmental, and safety impacts) on vehicles meeting the proposed derogation being excluded from towing a trailer (of any weight or size)?

Scope of the derogation

- 2.8 EU Member States, including Germany and France, have already secured a derogation for electric LCVs up to a weight limit of 4,250kg and Germany has recently had the scope of this derogation extended to cover other alternative fuels.
- 2.9 By including a variety of alternative fuels within the scope of the derogation, the proposal is technology neutral in line with Government policy. This means that it facilitates the uptake of new technologies, without favouring one over another. The proposal is intended to support reductions in GHG emissions (helping to meet carbon budgets) and improvements in air quality, most notably in cities. The inclusion of gaseous alternative fuels in a temporary

derogation would not conflict with the current UK Government's manifesto commitment to zero-emission vehicles. The use of gaseous fuels could also serve to encourage the road freight sector to adopt alternative HGV fuels as well as helping to further develop national infrastructure for refuelling.

- 2.10 Under these proposal, drivers will be required to abide by all current laws governing the use of vehicles heavier than 3,500kg. In addition, LCVs with a maximum authorised mass of between 3,500kg and 12,000kg are currently type approved as N2 category vehicles. There are a number of different technical requirements for N1 and N2 vehicles under vehicle type approval. We are not proposing to change type approval regulations, so all vans heavier than 3,500kg will continue to be required to conform to the N2 type approval regulations and in-use construction requirements.
- 2.11 The proposal will not have any effect on the current vehicle excess duty regime. This means any vehicle weighing over 3,500kg cannot be taxed as a LCV but instead will be subject to the heavy goods vehicle (HGV) excess duty, regardless of fuel type. However, a pure battery electric vehicle (either LCV or HGV) would currently be exempt from vehicle excess duty.
- 2.12 The proposal is to apply for a five-year derogation - after which time the situation would be reviewed. This would include consideration of the impact of the derogation on air quality and on GHG emissions, as well as developments in vehicle technologies, as tangible improvements here may negate the need for a longer term derogation.
- 2.13 It is difficult to estimate the uptake of this derogation, as it will depend on how manufacturers and operators respond to it. However a number of leading operators including John Lewis Partnership, UPS, DHL, Ocado and Sainsbury's have indicated that they would be keen to make use of the weight derogation should it be granted. In addition, the derogation should serve to increase the supply of alternatively fuelled vans to the UK market, with manufacturers and technology suppliers including BD Auto, ULEMCo and Paneltex indicating that they are supportive of the proposal.

2.14 Electric vehicles are still a relatively small part of the van fleet, with 0.12% of the market, and at present only around 1% of all vehicles registered in the UK are between 3,500kg and 4,500kg.

Q5: What percentage of operators do you estimate will take advantage of the extra weight allowances for vehicles with alternative fuel technologies?

2.15 Subject to consultation responses, a derogation request will be sent to the European Commission. On approval of the request, secondary legislation amending the UK's driving licence regulations would be made.

Proposal 2: To exempt certain alternatively-fuelled vans from goods vehicle operator licensing requirements in Great Britain

2.16 The main purpose of the goods vehicle operator licensing system is to ensure the safe and proper use of goods vehicles and to protect the environment around operating centres.

2.17 Subject to certain exceptions, you need an Operator's Licence to carry goods for either for your own business ("own account haulage") or commercially on behalf of others ("hire and reward haulage") if you use a motor vehicle on a road with:

- A gross plated weight⁶ of more than 3,500kg; or if it has no gross plated weight, an unladen weight⁷ of more than 1,525kg.

2.18 Own account haulage requires a "Restricted" Operator's Licence, while hire and reward haulage requires a "Standard" Operator's Licence (which can be either National or International). The rules around the "Standard" Operator's Licence are harmonised at EU level.

2.19 There is currently an exemption from all types of goods Operator's Licence for electric vehicles. In 2014, we consulted on removing this exemption (along with several others).⁸ The rationale for such a removal is that these vehicles are growing in number and increasingly of standard mainstream construction.

2.20 The latest DVLA figures indicate there were 423 registered electric goods vehicles with a maximum laden weight above 3,500kg in the UK at the end of 2015. There is a strong argument for removing the electric vehicles exemption while such vehicles are still relatively low in number, rather than imposing it at a future point on a larger existing fleet. Anecdotally, we understand that a certain proportion of these electric goods vehicles are in fleets already

⁶ The weight of the vehicle when it's not carrying any passengers, goods or other items.

⁷ Goods vehicles above 3,500kg also have a plated weight which may set a weight limit below the MAM, depending on taxation and other regulatory considerations.

⁸https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/385957/Goods_Vehicle_Operator_Licensing_Exemptions_Consultation.pdf

subject to operator licensing, although we do not have specific numbers for this.

2.21 Following the 2014 consultation, there was little response relating to electric vehicles with only one operator of electric vehicles expressing disagreement with their inclusion in the regulatory regime. The increasing number of electric goods vehicles was recognised by some respondents who stated that they would prefer that electric vehicles being used as HGVs to carry goods should be subject to normal operator licensing provisions.⁹

2.22 Since the 2014 consultation was published, the issue addressed in this document regarding heavier alternatively-fuelled vans has come to light. We consider that in parallel to the proposed driving licence derogation for certain sub 4,250kg vans, there may be merit in modifying our proposal for operator licensing in order to avoid having the unintended effect of disincentivising the take-up of electric vans.

2.23 As set out above, the existing proposal is the removal of the general exemption for electric vehicles from goods vehicle operator licencing requirements in Great Britain. Should we proceed with this proposal, we are considering slightly modifying it by introducing a limited exemption from restricted operator licensing requirements for alternatively-fuelled vans not exceeding 4,250kg gross vehicle weight.

2.24 This would have the benefit of avoiding a situation in which a local tradesperson who buys a 4,250kg electric van would be brought into the operator licensing regime, with the associated time and expense that that would entail. There are 110 registered electric goods vehicles between 3,500kg and 4,250kg that would initially be subject to this exemption, but it is unclear how many of their operators already hold an Operator's Licence (and would not therefore be affected). However, as discussed elsewhere, the driver licensing derogation and general market developments might be expected to increase the uptake of such vehicles. In line with the reasoning set out in this consultation for the driver licensing derogation, we would propose to apply this exemption to all alternatively-fuelled vans.

⁹ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/449359/licensing-response.pdf

2.25 We do not consider there to be a strong case for applying such an exemption to hire and reward haulage operators, since these operations tend to be larger in scale and better able to absorb the costs of operator licensing, and are also more likely to already hold an Operator’s Licence.

2.26 In addition, there is a legal consideration since under EU rules for hire and reward haulage, any exemptions must be purely for domestic journeys and have a minor impact on the transport market because of either the “nature of the goods carried” or the “short distances involved”.¹⁰ It is difficult to argue, particularly as their range increases, that electric vehicles meet either of these conditions.

2.27 It should be noted that this proposed exemption would be expected primarily to benefit a different group of businesses from the proposed driving licensing derogation, which is mainly aimed at larger hire and reward operators. However, the measures complement each other by reducing regulatory barriers to the take-up of alternatively-fuelled vans.

2.28 The modified position we are here consulting on is set out in bold in the table below.

	Fuel type	< 3,500kg	3.500kg – 4,250kg	> 4,250kg
Own-account haulage (Restricted O-Licence)	Electric	Not required	Currently exempt; proposal to maintain exemption subject to review.	Currently exempt; we have already consulted on removing exemption.
	Other alternative		Currently in scope; proposal to exempt subject to review.	Currently in scope; no change proposed.
Hire and reward haulage (Standard National or International O-Licence)	Electric	Not required	Currently exempt; we have already consulted on removing exemption.	
	Other alternative		Currently in scope; no change proposed.	

¹⁰ Regulation (EC) 1071/2009, Art.1(5)

2.29 As is standard practice, such an exemption would be subject to a legislative review clause. This means that we would review the effect of the measure five years after it came into force. This would include consideration of whether vehicle technology has improved such that there is no longer a clear case for the exemption.

Q6: If we proceed with removing the general exemption from operator licensing for electric vehicles, should we exempt alternatively-fuelled goods vehicles with a gross vehicle weight not exceeding 4,250kg and used for own-account haulage? Please provide reasons to support your view. Supporting evidence is welcomed.

Proposal 3: For roadworthiness testing for electric vans in Great Britain

Larger electric goods vehicles (HGVs)

2.30 Goods vehicles with a maximum laden weight of more than 3,500kg are subject to annual roadworthiness testing by DVSA staff in goods vehicle testing centres (at authorised testing facilities or DVSA test centres). We consulted in December 2014 on the removal of an exemption from annual roadworthiness testing for certain categories of these vehicles,¹¹ and we expect to issue a Government response to these proposals later this year. One of the categories was electrically-powered vehicles. This exemption dates from the inception of the testing regime, at a time when such vehicles were much more limited in number and of specialist construction.

2.31 Since then, their numbers have increased (and are expected to grow further) and their construction is generally on a standard chassis. We therefore think there is a strong case to correct this anomaly in the vehicle testing regime, with the aim of ensuring road safety. It is arguably desirable that this should be done at a time when electric HGV numbers are still relatively low.

Smaller electric goods vehicles (vans)

2.32 Lighter (sub 3,500kg) goods vehicles (vans) are tested under the private MOT regime, starting when they are three years old and annually thereafter. Currently, electric vans benefit from the same historical exemption as larger electric goods vehicles. As of the end of 2015, there were 4,544 electric vans registered in Great Britain. Since we believe that the existing legislative exemption is not widely known, it is reasonable to assume that a significant number of these vehicles already undergo MOT testing, although we do not know how many this applies to.

2.33 **Should we proceed with removing the exemption for larger electric goods vehicles, we would intend, for the same rationale, to also remove the current exemption for electric vans in Great Britain.** This would also avoid the creation of a

¹¹ <https://www.gov.uk/government/consultations/hgv-periodic-testing-and-inspections-exemptions>

significant regulatory disparity between electric vans above and below the 3,500kg threshold, which could act as a disincentive for the take-up of vehicles that would be pushed over that threshold by their additional battery weight.

2.34 However, this measure would be subject to an important qualification. Electric milk floats are the main type of vehicle that historically benefited from this exemption. We estimate that they could number up to 1,000. We do not intend to bring traditional milk floats into the scope of testing: they were exempt from type approval requirements prior to 2014 and hence of varying and unknown design specifications, which could cause difficulties for testing. We propose to retain an exemption for electric goods vehicles first registered before 1 March 2015.¹²

Summary

2.35 The position we are consulting on is set out in bold in the table below.

Fuel type	< 3,000kg	3,000kg – 3,500kg	> 3,500kg
Electric	Currently in scope; no change proposed.	Currently exempt; proposal to remove exemption.	Currently exempt; we have already consulted on removing exemption.
Other alternative-fuel		Currently in scope; no change proposed.	Currently in scope; no change proposed.
Conventional (Petrol and Diesel)		Currently in scope; no change proposed.	Currently in scope; no change proposed.

Q7: Do you envisage any difficulties with the proposed approach to the MOT testing of electrically-powered vans? If so, please provide details.

¹² As separate policy, we are proposing to introduce a new exemption from roadworthiness testing for “low speed” vehicles, i.e. those that are not capable of exceeding 25km/h (about 15.5 mph). This exemption would apply to all vehicles regardless of first registration date and propulsion type, and so could include any new low-speed milk floats. There is an equivalent exemption from type approval.

Consultation Questions

- 3.0 For each question below, please explain the reason(s) for your answer and provide evidence when available. Please note that under our proposals, there is no requirement for operators to take advantage of the extra weight allowances - this will only be done on a voluntary basis.

Proposal to increase the weight limit of alternatively-fuelled vans that can be driven on a category B driving licence in the United Kingdom

Q1: Can you explain and quantify any benefits (e.g. economic, environmental) that the proposed policy would bring?

Q2: Can you explain and quantify any disadvantages (e.g. economic, environmental) that the proposed policy would bring?

Q3: What are your views on the safety implications of the proposed policy, including drivers of alternatively-fuelled vehicles at 4,250kg no longer being within the scope for taking the Driver Certificate of Professional Competence (DCPC)?

Q4: What are your views (e.g. economic, environmental, safety) on vehicles meeting the proposed derogation being excluded from towing a trailer (of any weight or size)?

Q5: What percentage of operators do you estimate will take advantage of the extra weight allowances for vehicles with alternative fuel technologies?

Proposal to exempt certain alternatively-fuelled vans from goods vehicle operator licensing requirements in Great Britain

Q6: If we proceed with removing the general exemption from operator licensing for electric vehicles, should we exempt alternatively-fuelled goods vehicles with a gross vehicle weight not exceeding 4,250kg and used for own-account haulage? If not, please provide details. Supporting evidence is welcomed.

Proposals for roadworthiness testing for electric vans in Great Britain

Q7: Do you envisage any difficulties with the proposed approach to the MOT testing of electrically-powered vans? If so, please provide details.

How to Respond

4.0 The consultation period began on 26 July 2017 and will run until 18 October 2017. Please ensure that your response reaches us before the closing date. If you would like further copies of this consultation document, it can be found at www.gov.uk or you can contact olev.enquiries@olev.gsi.gov.uk.

4.1 Please send your responses to the consultation questions to:

Office for Low Emission Vehicles,
Zone 1/31, Great Minster House,
33 Horseferry Road,
London,
SW1P 4DR

4.2 If you are responding via email, please send it to olev.enquiries@olev.gsi.gov.uk with the subject line “Regulatory changes to support the take-up of alternatively-fuelled Light Commercial Vehicles”.

4.3 When responding, please state whether you are responding as an individual or representing the views of an organisation. If responding on behalf of a larger organisation, please make it clear who the organisation represents and, where applicable, how the views of members were assembled.

Freedom of Information

- 4.4 Information provided in response to this consultation, including personal information, may be subject to publication or disclosure in accordance with the Freedom of Information Act 2000 (FOIA) or the Environmental Information Regulations 2004.
- 4.5 If you want information that you provide to be treated as confidential, please be aware that, under the FOIA, there is a statutory Code of Practice with which public authorities must comply and which deals, amongst other things, with obligations of confidence.
- 4.6 In view of this it would be helpful if you could explain to us why you regard the information you have provided as confidential. If we receive a request for disclosure of the information, we will take full account of your explanation, but we cannot give an assurance that confidentiality can be maintained in all circumstances. An automatic confidentiality disclaimer generated by your IT system will not, of itself, be regarded as binding on the Department.
- 4.7 The Department will process your personal data in accordance with the Data Protection Act (DPA) and in the majority of circumstances this will mean that your personal data will not be disclosed to third parties.

Next Steps

- 4.8 The Department wants to consider evidence on all potential effects of the proposed policy option before making a decision on what to do next. A summary of responses, including the next steps, will be published on www.gov.uk/dft. Paper copies will be available on request.

Annex 1 Consultation Principles

The consultation is being conducted in line with the Government's key consultation principles which are listed below. Further information is available on the Better Regulation Executive website at <https://update.cabinetoffice.gov.uk/resource-library/consultation-principles-guidance>

If you have any comments about the consultation process please contact:

Consultation Co-ordinator
Department for Transport
Zone 1/14 Great Minster House
33 Horseferry Road
London
SW1P 4DR

Email: consultation@dft.gsi.gov.uk

Please do not send consultation responses to this address.

Annex 2 Consultation Terms

The technical terms referred to in the consultation are explained below.

Kerb Mass / Unladen Mass (Weight): The weight of the vehicle when it's not carrying any passengers, goods or other items. It includes the body and all parts normally used with the vehicle when it's used on a road. This includes the weight of the fuel or, if it's an electric vehicle, the batteries.

Maximum Authorised Mass (MAM) / Gross Vehicle Weight (GVW): The weight of a vehicle including the maximum load that can be carried safely when it's being used on the road. This is also known as permissible maximum weight. Goods vehicles above 3,500kg also have a **plated weight** which may set a weight limit below the MAM, depending on taxation and other regulatory considerations.

Gross Payload: The maximum authorised mass of a vehicle minus the unladen weight.

Category N: Motor vehicles with at least four wheels designed and constructed for the carriage of goods.

Category N1: Vehicles designed and constructed for the carriage of goods and having a maximum authorised mass not exceeding 3,500kg.

Category N2: Vehicles designed and constructed for the carriage of goods and having a maximum authorised mass exceeding 3,500kg but not exceeding 12,000kg.

Category N3: Vehicles designed and constructed for the carriage of goods and having a maximum authorised mass exceeding 12,000kg.