

**From:** [REDACTED]  
**To:** [Clean Cars](#)  
**Subject:** LEVs Submission  
**Date:** Thursday, 11 July 2019 7:40:51 PM

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To MoT,

1. Overall I support the concepts set out in the LEVs consultation document dated 9 July 2019. I would like to have seen the changes come sooner, but I understand that it does take time to implement changes like this.

2. My specific comments are:

(a) In my experience a new car has a range of prices. If an individual buys a new car from a dealer they will normally pay the highest price. But if a large company or a local authority (and probably central government) buys the same car the price will be much less. I have seen discounts of 30% to large organisations. With this happening, what is the price of a new car? It will be important for the MoT to sort this out so that the clean car standard and the clean car discount can be applied fairly.

(b) The motor vehicle dealers association usually gives negative advice to the media about the expected impact of improvements to car standards, ie they advise that prices will go up. But from what I have seen, prices do not increase after standards increase.

(c) Heavier cars probably travel longer distances on an annual basis. If this is so, they would emit more CO<sub>2</sub> than allowed in the consultation document as it appears to me that the consultation document assumes the same average annual travel across all weight classes. Consequently, the heavier weight classes would need to have a lower allowable CO<sub>2</sub> level than shown in the consultation document.

(d) RUC fees are based on road wear caused by vehicles travelling on roads, so heavier vehicles pay higher RUC fees per km. However, the minimum RUC fee is for vehicles up to 3 tonne. This means that light vehicles subject to RUC fees (eg diesel vehicles now, and EVs and hybrids in the future) pay more road tax than light vehicles that pay their tax through petrol excise tax. (I haven't got time to work this out right now, but I am sure MoT staff can do this.) In essence the required outcome is that for vehicles under 3 tonne, there needs to be another band for RUC fees; eg under 1.5 tonne. MoT staff will be aware of the 4th power rule which means that if you double the weight on an axle, the vehicle does sixteen times the damage to the road. So vehicles at the light end of the weight range do very little road damage, and need to pay low RUC fees.

Regards,

Ross

Ross Vincent

[REDACTED]