



Zero Emission Zone  
Oxfordshire County Council  
New Road  
Oxford  
OX1 1ND

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Dear Sir/Madam

As the trade body for the car club, vehicle rental and leasing sector I am writing to you to offer our industry's perspective on the Oxford Zero Emission Zone and the 'Red Zone' that is being proposed by Oxfordshire County Council and Oxford City Council.

The BVRLA is fully supportive of measures being taken by councils to tackle pollution but believes that these must be balanced against their impact on the economy and people's quality of life.

Our members own and operate over five million cars, vans and trucks on UK roads, that equates to 1-in-8 cars, 1-in-5 vans and 1-in-5 trucks. They buy approximately half of all new vehicles sold in the UK, including around a third of all new electric and plug-in hybrid vehicles.

#### **Consideration for commercial vehicles**

Although the Red Zone relates to a very small area, we are concerned about the impact that this will have on commercial vehicle operators who have to enter the zone to deliver essential goods and services to the local community and businesses. There are currently no zero emission trucks on the market and no scalable retrofit options either. Furthermore, although there is a little more choice for zero emission light commercial vehicles there are significant issues with supply with reported lead times of over a year for many models.

The life of an HGV is typically of the order of 12 years and the cost of upgrading to newer vehicles outside of the normal fleet replacement cycle will be expensive for operators. With a new tractor unit costing approximately £80k and a typical 18 tonne truck £40k, hauliers cannot afford to make these replacements over a short time frame by December 2020.

There is still a great deal of uncertainty about which zero emission technology is most viable for commercial vehicles or when it is likely to come to the market. It must also be recognised that technology will need to adapt depending on the purpose of the journey and that some may take longer to come to market, for example refrigerated units which carry fresh food to local shops, cafes, bars and restaurants.

While we welcome the proposal to allow commercial vehicles to enter the zone free of charge between 7pm to 7am, out of hours deliveries are only a viable option if the local businesses within the zone are happy to also work out of hours.

Due to these factors we would urge the councils to go back to its original plans which excluded HGVs, or to provide exemptions for commercial vehicle operators until there are suitable alternatives on the market. It is also vital that the councils work with the industry to see how the market is developing and to agree on interim solutions that can work for all.

#### **BVRLA Ltd**

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### **Targeted scrappage**

As a part of their plans for the Ultra-Low Emission Zone, Transport for London has made the promotion of renting and leasing a key feature of its scrappage scheme. Smaller businesses who may find purchasing replacement vehicles prohibitively expensive can benefit from the option of renting or leasing as part of a targeted scheme. We would be happy to work with you to look at how renting and leasing can support taking the most polluting vehicles off the road.

### **Opportunities for further engagement**

Over the past few years we have demonstrated our commitment to working collaboratively with interested parties including engaging with Leeds, Nottingham, Derby, Birmingham, Coventry, Bath and North Somerset Councils as well as Transport for London and the West Midlands and Greater Manchester combined authorities. As part of that engagement we hosted a series of roundtable discussions in partnership with the Energy Saving Trust, Fleet News and ACFO. All the roundtables produced very positive feedback from Council members, officials and from our participating members.

We welcome the recent proposal made by the Department for Transport that all new housing developments should include an electric charging point but believe that we must go further to provide a step change in transport behaviour. We believe that as part of a broader overall transport strategy local authorities should look to increase the provision of car clubs and we would be happy to introduce you to providers in your area.

The BVRLA is committed to working collaboratively with all local authorities to ensure that air quality is tackled in heavily polluted areas whilst balancing potential impacts on businesses and the public. We would be keen to work with you as your proposals for the red zone are further developed and to discuss how our car club, rental and leasing members may be able to support you as you prepare for the green zone.

If you have any questions about how the BVRLA can help support your work, or if you would like to meet with some of our members in your local area for a more detailed discussion, please do feel free to contact me on [catherine@bvrla.co.uk](mailto:catherine@bvrla.co.uk)

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Catherine Bowen', with a stylized, flowing script.

Catherine Bowen  
Senior Policy Advisor

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