

Clean Air Zone Framework for Wales

Question 1 Do you agree that Clean Air Zones (CAZs) would provide an effective way of addressing air quality in Wales?

The BVRLA supports in principle the proposal to introduce Clean Air Zones in towns and cities across Wales to address the challenge of poor air quality in those areas. As BVRLA members operate the newest, cleanest and greenest vehicles on UK roads, we are confident that the majority of these vehicles will be compliant with the latest emissions standards, and will therefore comply with the standards required to enter a CAZ without incurring a charge payment.

However, steps should be taken to ensure that operators of Commercial Vehicles (HGVs and LCVs) are considered when devising the standards of a resulting CAZ. CVs, particularly larger vehicles such as HGVs, are typically purchased for a longer vehicle lifespan (often up to ten years), and these are extremely unlikely to be scrapped in the event of a new CAZ being implemented – the likelihood is that they will simply be moved to another area, or the fee will be absorbed into the overall running costs (hitting business, particularly SMEs). The BVRLA therefore believes that a realistic sunset clause, providing commercial vehicle operators sufficient time to plan and upgrade their fleets (we would suggest 2-3 years), should be included as part of any future Clean Air Zone strategy. From an HGV perspective, the Euro VI emissions standard will deliver in terms of NOx reductions. This will be the only long-term solution for commercial vehicles, particularly for HGVs for which diesel is the only viable fuel. However, sufficient time must be given for these to be adopted by the fleet sector.

Question 2 Should Welsh Government direct local authorities to introduce a Clean Air Zone, and, if so, under what circumstances should it do so?

For cars, we would propose the Euro 6 standard, which is the most up-to-date and lowest emission standard.

For commercial vehicles, we support a sunset clause for operators of non-Euro VI vehicles, as detailed above.

The BVRLA also believes that the Welsh Government should ensure a common standard, signage, and penalties as part of its CAZ strategy. This will protect against any confusion (or accusations of unfairness) on the part of the business sector. We would hope these are as similar as possible to other parts of the UK, for the same reasons.

Question 3 Do you consider the options/advice at section 5 to be suitable and effective elements of a CAZ?

Yes, subject to the above considerations.

Question 4 Do you agree that the minimum emissions standards outlined in Annex 2 of the CAZ Framework should be applied to determine road vehicle access in Welsh CAZs, and that these standards should be tightened over time in order to apply more rigorous real-world emissions data?

Yes. In terms of changing the standard over time, the BVRLA agrees that the current emissions standard will eventually need to be updated, to ensure the cleanest and greenest standards on UK roads. However, we would urge the provision of as much notice as possible when upgrading this standard, with particular regard to the commercial vehicle sector, many of which vehicles are purchased for use over a vehicle lifetime of up to 10 years and over.

We would also like to see a guarantee from the Welsh (and UK) governments that no individual or business operator who purchased a vehicle which adhered to the highest emissions standard at the time will be hit by a retrospective tax increase or CAZ fee if the standards are changed within three years of the vehicle's first purchase.

Question 5 Do you agree that Local Authorities should have flexibility to target only those vehicles that may be presenting the biggest air pollution problems locally, or should access restrictions apply to all categories of vehicle, wherever CAZs may be introduced in Wales?

Yes, Local Authorities should target only those vehicles which are contributing to poor air quality.

Question 6 Should local authorities have the flexibility to vary the times that CAZ restrictions should operate, or would full-time operation provide the most desirable solution in terms of meeting air quality challenges?

Yes, local authorities should have the flexibility to vary the times that the CAZ is in operation. Given that one of the biggest contributors to poor air quality is congestion (particularly by large commercial vehicles which operate almost exclusively on diesel), the Council could incentivise fleets to make collections and deliveries outside times of heavy traffic. For example, fleet vehicles could be allowed to enter the CAZ without charge between 7pm to 7am. This worked during in London during the Olympics and could be extended to work across other cities. BVRLA members and affiliates representing the retail sector have confirmed that this would be very possible.

Question 7 Should Welsh Government consider options for mandating either a charging or a non-charging CAZ structure in Wales, or should this be left to local authority determination depending on evidence of which of the two may be the most effective means of reducing airborne pollution locally?

The BVRLA believes that the CAZ structure should be as consistent as possible, and therefore all standards agreed and set at national level, before being implemented by Local Authorities.

Question 8 Would a part-charging model bring any benefits over the alternatives of a total ban on non-compliant vehicles, or a charging system with full coverage within the CAZ?

A part-charging model would be beneficial to operators of vehicles which are close to, if not fully, compliant. Given that the emissions difference between Euro 3 and Euro 6 is so great, other City Councils due to implement a CAZ have considered introducing a tapered CAZ charge. This would be a welcome development, particularly if tapered levels were introduced on a national basis.

Question 9 Should local authorities have full flexibility to determine the level of any access charges they may apply, or should Welsh Government establish national criteria for local authorities to refer to?

Again, the BVRLA believes that the CAZ structure should be as consistent as possible, and therefore all standards agreed and set at national level, before being implemented by Local Authorities.

Page 3: Submit your response

You are about to submit your response. Please ensure you are satisfied with the answers you have provided before sending.

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If you want to receive a receipt of your response, please provide an email address. Email address

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