



Zero Emission Zone
Oxfordshire County Council
New Road
Oxford
OX11ND (email: zez@oxfordshire.gov.uk)

15 January 2021

Dear Sir/Madam

Oxford Zero Emission Zone: Proposed local charging scheme for the ZEZ Pilot - Formal Consultation

As the Legislation Director for the Federation of British Historic Vehicle Clubs (FBHVC), I am responding to the Final Formal Consultation in relation to the above scheme. The Federation has responded previously in detail to earlier feasibility studies on an Oxford ZEZ and its aims should be familiar to the County Council Team.¹ In summary the FBHVC is the umbrella body for the historic vehicle movement in Britain and represents over 500 member clubs in the UK. These organisations together represent in total over a quarter of a million owners of and enthusiasts for historic vehicles of all types.

I apologise for not completing the online survey. However, having examined the questions contained therein our further observations are very limited and it seemed more appropriate to accept your option of isolating the specific areas for comment. These are set out below.

Formal submissions

Question 7

What are your business or organisation's views on the proposed discounts for certain types of vehicles (the proposed discounts are different from those proposed in the consultation in January 2020 – please see Section 5 of the 'Final ZEZ Proposals' document for details)?

The Federation notes and welcomes the inclusion in Table 6 (Proposed Permanent Discounts) of vehicles in the historic tax class in line with the Government's Clean Air Zone Framework published in May 2017. This ensures that vehicles over 40 years old will be exempt from the charge and meets the requirements of major stakeholders in the locality consulted by us.

Question 16

Do you have any further views on the ZEZ Pilot proposals including how they might affect you day to day? If you have any suggestions for changes to the ZEZ Pilot proposals please include them here.

¹ FBHVC response to Oxford Zero Emission Zone Feasibility and Implementation Study Final report dated 31 July 2017



We believe that the account of how the administration and enforcement of discounts would work is not clear. On the one hand it is stated in the Consultation that :

“[t]he ZEZ Pilot would work in a similar way to the London Congestion Charge and Ultra Low Emission Zone. Signs would be installed around the perimeter of the zone and on the routes into the city to notify drivers of the ZEZ Pilot.” [5.12]

It also goes on to state that:

“Registrations for discounts would need to be made and approved before entering the zone, or the charge paid in full. The county council will publish the process for applying for discounts, the supporting documentation required, and the timescales for applications to be determined well in advance of the ZEZ Pilot coming into effect.”[5.14]

These two statements are not however consistent with the London ULEZ scheme in respect of vehicles in the historic tax class. In relation to the London ULEZ, there is no requirement for UK registered historic vehicles to register for an exemption or discount, the scheme being enforced by ANPR cameras (also referred to in your Consultation), which automatically detect the VED status of the vehicle. In addition, as is commonly provided on websites relating to Clean Air Zones in other cities, we would request a facility to allow for the status of the vehicle to be confirmed through an online “Checker” provision.

The Federation would therefore ask that the Oxford ZEZ historic vehicle discount is administered and enforced in a similar way (or confirmation that it will in fact work in the same manner as the London ULEZ) but with provision for overseas vehicles which meet the relevant historic criteria to be registered for a discount.

We have no further comments to make and I thank you for your attention in this matter.

Yours sincerely

Lindsay J Irvine

Lindsay John Irvine
Director - Legislation
Federation of British Historic Vehicle Clubs



Federation of British Historic Vehicle Clubs Ltd, PO Box 295, Upminster, Essex, RM14 9DG

Tel: 01708 223111 E-mail: secretary@fbhvc.co.uk Web: www.fbhvc.co.uk

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