



Response of the Federation of British Historic Vehicle Clubs ('the Federation')

to

The Consultation dated 25th April by the Welsh Government on a Framework for Clear Air Zones in Wales

The Federation represents over 550 member clubs in the UK with a total membership of over a quarter of a million historic vehicle owners and enthusiasts. Interest in historic vehicles sustains economic activity worth £5.5 billion annually to the UK economy and supports the employment of nearly 35,000 people.

Vehicles owned by members of the Federation include historic vehicles of many kinds, including cars, motorcycles, buses, coaches, lorries, vans, utility vehicles, military vehicles, tractors and other agricultural vehicles and steam engines.

Federation members restore and preserve these vehicles for their historic interest, exhibit them at exhibitions, shows, community fetes, etc. and currently use the country's highways both in order to attend at those events, but also to participate in touring events and for general leisure purposes.

Question 1 – Do you agree that CAZs would provide an effective way of addressing air quality challenges in Wales?

This question is outside the competence of the Federation.

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

This question is outside the competence of the Federation.

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

This question is outside the competence of the Federation.

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?

This question is outside the competence of the Federation.

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 have the flexibility to target only those vehicles that may be presenting the biggest air pollution problems locally. See the answer to Question 10

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

Registered Office: The Barn, Holly Berry House, Hamstall Ridware, Rugeley, Staffordshire, WS15 3SQ Registered in England No 3842316 VAT Reg No. 636 788683



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?

The answer to this question covers matters beyond the competence of the Federation. However, the more that the restrictions in any CAZ extend outside normal business hours the greater could be the consequences for historic vehicles if not generally exempted, for the reasons outlined in the answer to Question 10.

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?

If a non-charging CAZ structure means actual restriction of vehicles from the CAZ, the Federation favours a charging mechanism which, if a camera controlled enforcement mechanism was in force would probably mean that only vehicles in the historic taxation class were able to be identified, would enable non-exempt vehicles between thirty and forty years old which were internationally deemed to be historic but which, not being over forty years old, were not yet eligible to be in the historic taxation class to make the occasional decision to enter the zone and make payment of the charge.

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?

Without prejudice to the general request for exemption of historic vehicles from CAZs set out in the answer to Question 10, the Federation considers that, if not made generally exempt, historic vehicles might be disproportionately affected by charging which was higher in urban centres than their environs. The rare occasions on which historic vehicles may have reason to enter urban centres might well involve access to civic spaces and areas where their presence would be justifiable on a heritage basis and a higher charge would thus penalise this activity. On the other hand, it is probable that more owners of historic vehicles will be resident in outer urban areas where there is more likelihood of space for the vehicles while not in use.

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?

This question is outside the competence of the Federation

Question 10 - Do you agree with the proposed vehicles and categories of drivers that should be exempt from meeting published access requirements within a CAZ?

1. The Federation wishes to respond to this question only in respect of one category of the vehicles set out in Annex 3: “Vehicles and categories of drivers exempted from CAZ restrictions (2018)”. That category is “Historic vehicles that cannot be upgraded to meet emissions standards”.
2. The Federation is particularly concerned that the only reference to historic vehicles, in Annex 3 of the Framework, is to vehicles “that cannot be upgraded to meet emissions standards”.
3. The Federation is concerned that the position of historic vehicles and their importance to the history and culture of the countries of the United Kingdom has not been properly considered in the Framework document. The category, as defined, is not subject to any analysis, simply listed.



- 4 The concept of 'mobile heritage' is one which is being increasingly recognised in the United Kingdom. Given the significance of the internal combustion engine throughout the twentieth Century and the effect of vehicles on the natural and built environment, there is a clear social benefit in preserving a record of internal combustion powered vehicles which is assisted and enhanced by the use of a proportion of these vehicles actively for recreational and heritage related purposes.
- 5 The category exempted from Welsh CAZs, in common with the approach which the Federation understands is being adopted in both England and Scotland, should take account of the generally recognised definition of a historic vehicle. The Government of the United Kingdom effectively defines these vehicles by reference to the 'historic' taxation class, which is currently based upon a rolling forty years after its build date.
- 6 It is of note however that there is an international standard, recognised by both UNESCO and the European Union, of thirty years from build date, which in the view of the Federation is the correct timeframe required to cover virtually all vehicles whose use would have ceased if they were not being actively preserved.
- 7 The comments of the Federation should be regarding as applying to all vehicles over thirty years old, though it is recognised that the use of the 'historic' taxation class does assist the operation of technological solutions such as ANPR cameras across the United Kingdom.
- 8 Though statistics exist which identify the entire number of historic vehicles across the United Kingdom the Federation is unaware of any statistics which would help to identify the number of vehicles resident in Wales which would be affected by reason of both being historic and in actual use at any given time. The number will definitely be statistically insignificant as a percentage of the total of vehicles in Wales.
- 9 As far as the Federation is aware all prior consultations and proposals in the United Kingdom have recognised that although individual historic vehicles do not normally meet contemporary emissions standards, the cultural significance of historic vehicles when compared with their highest possible effect on the environment or health is such that there is not a social need to interfere with their design or build and that their inevitably rare appearance in Clear Air Zones will have no significantly measurable effect on either emissions or health.
- 10 The use of historic vehicles is not simple 'transportation' at all. With very few exceptions, historic vehicles are not used as a means of transport, but for travel to and from, and participation in, events which are of cultural significance in their own right. The use of historic vehicles is limited, and the mileage is usually very small when compared with contemporary vehicles. The use of historic vehicles at times of congestion and high concentrations of pollution is and will remain extremely rare.
- 11 For this reason, any benefit to overall emissions from historic vehicles by replacing or modifying their power units would be vanishingly small and would not justify the cost effort, and loss of originality involved.
- 12 The cultural and heritage value of a historic vehicle is greater the more original is the vehicle. Thus, the presence in the vehicle of as many as possible of the mechanical parts and components of which it is constructed is culturally important. This very clearly extends to the power unit.
- 13 It is of the very essence of a historic vehicle that it is not generally required to be upgraded in any way from its build standard. Any change is universally recognised as a compromise. While many vehicles accepted as historic have had improvements made, the amendments to engines which would be



required to cause them to be in line with modern emissions standards would be such as to destroy their very nature and purpose.

- 14 It is of note that the Driver and Vehicle Licensing Agency will not accept changes which are too significant to a vehicle before considering that vehicle has lost its identity and is no longer able to be treated as historic.
- 15 Further, the recently introduced changes to the national Roadworthiness Testing schemes mean exemptions are available only to those vehicles which have not been subject to substantial change.
- 16 Any vehicle whose fundamental source of propulsion was altered, for instance to electric, would not be generally acceptable as being a historic vehicle even though its external appearance might create the illusion that it was. It would be wrong therefore from a cultural point of view to encourage or persuade owners of historic vehicles to reduce their societal value as historic artefacts.
- 17 The Federation therefore requests that the qualification “that cannot be upgraded to meet emissions standards” should be deleted from Annex 3 and that exemption be available generally to historic vehicles within CAZs in Wales. Self-evidently, this exemption is not sought in respect of areas within which a total exclusion of powered traffic has been initiated.

Question 11 - Do you think sufficient consideration has been given to non-road sources of air pollution in the Framework?

This question is outside the competence of the Federation

Question 12 – How best should information about a CAZ be made publicly available in order to ensure the clearest and widest possible notice of what access restrictions will mean to those travelling within the area?

This question is outside the competence of the Federation

Question 13 – Do you have any views on how the impact/success of a CAZ should be measured, and how this information should be used to develop a local CAZ over time to ensure the widest ongoing possible benefits for air quality?

This question is outside the competence of the Federation

Question 14 – Could the advice in the draft Framework have any positive or adverse effects on the Welsh language, and how could the document increase the former/mitigate the latter?

This question is outside the competence of the Federation

Question 15 - Do you wish to make any further comments about the Clean Air Zone Framework for Wales?

No