



Traffic Management Team
Bath and North East Somerset Council
Lewis House
Manvers Street
BATH BA1 1JG
(email: parking_consultation@bathnes.gov.uk)

2 August 2023

Dear Sir/Madam

23-009 - (Off Street Parking Places) (Bath) (Variation No.6) Order 202-

Introduction

As the Legislation Director for the Federation of British Historic Vehicle Clubs (FBHVC), I am responding to the Public Consultation in relation to the above draft regulations and proposed parking charge regime. In brief, 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. The principal mission aim of the Federation is to maintain the freedom to use the vehicles of yesterday on today's and tomorrow's roads and to encourage the preservation and promotion of all types of vehicles within the broader context of our national heritage. Interest in historic vehicles is widespread with 1 in 5 of adults across all age groups interested in historic vehicles.¹ It sustains economic activity worth £7.2 billion annually to the UK economy and supports the employment of nearly 35,000 people,

The Proposal

First of all the FBHVC does not oppose in principle the above proposal to introduce emissions based parking charges for council car parking and accepts the appropriateness of Council action to address poor air quality. However for the reasons stated in detail below, the FBHVC asks that historic vehicles be treated as a uniform separate category, as they are in terms of DVLA VED banding, and are placed at the lowest chargeable level rather than be charged according to engine capacity.

Rationale

The Council will know from the introduction of the Category C Clean Air Zone (CAZ) that historic vehicles are granted an exemption from charges for entry into CAZ and Low Emissions Zones (LEZ). In England this is in accordance with direction from Central Government guidance.² The FBHVC has been heartened to note that to date all local authorities in England who have introduced CAZ and LEZ have followed the guidance on historic vehicle exemptions in their enabling regulations, including the

¹ FBHVC National Historic Vehicle Survey 2020/1

² Clean Air Zone Framework: <https://www.gov.uk/government/publications/air-quality-clean-air-zone-framework-for-england>



Greater London ULEZ. Indeed, the separate LEZ legislative regime in Scotland has also recognised the special status of historic vehicles.

As stated in the Departmental guidance referred to above, the stated rationale for an exemption is based on “ *[historic vehicle] age and/or their unsuitability for retrofitting or purchasing a replacement vehicle.*” With their heritage value recognised by the Government and the wider public, if they are penalised or subject to ban, since they cannot be modified, their continued existence could be put at risk.

However the broader case for exemption for historic vehicles is also based on their very small contribution to emissions. Historic vehicles represent only just over 3% of all vehicles registered with the DVLA and according to our survey³, on average are only driven by their owners for around 1200 miles per year and overwhelmingly for leisure purpose. Their contribution to adverse air quality in cities is, as consequence, insignificant.

The request

Unlike in the case of CAZ or LEZ, the FBHVC is not asking for relief from parking charges. It notes that all vehicles, including zero emissions ones, will still be subject to charges for parking. However for all the reasons justifying relief from CAZ or LEZ charges as set out above, the FBHVC requests that historic vehicles be treated as one class linked to their DVLA VED banding (zero) and placed in the lowest charging category.

The above should pose no technical or administrative difficulty. The DVLA VED banding already exists so would be recognised by the parking machines and App as evidenced by using the online checker⁴. Indeed we believe that recognising the historic vehicle VED category would simplify the process in comparison to the categories based on cubic capacity of vehicles which may not, because of the age of some of the vehicles concerned, be accurately recorded on the DVLA database. The amendment to the draft regulation would be straightforward. We believe that charging historic vehicles in this manner would be more equitable and fair and consistent with broader clean air policy.

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

Yours faithfully

Lindsay J Irvine

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

³ See footnote 1

⁴ <https://www.gov.uk/get-vehicle-information-from-dvla>