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**16<sup>th</sup> October 2019**

Dear Sirs

### **Bath Clean Air Zone Consultation 2019**

I refer to the proposal for Bath's Clean Air Zone and consultation exercise.

The Federation of British Historic Vehicle Clubs [FBHVC] responded to the original consultation in 2018 on behalf of our members. Please find our response to your proposal appended. Our comments do not easily sit in the on-line consultation system and are consequently forwarded in letter format.

#### ***The Federation of British Historic Vehicles [FBHVC]***

The Federation of British Historic Vehicle Clubs (the Federation) represents over 500 member clubs with a total membership of 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 Federation members 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. These vehicles range in age from thirty years old (the internationally accepted definition of historic vehicles as used by UNESCO) to vehicles built during Queen Victoria's reign. Our 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.

The Federation, both itself and through its membership, is the primary national repository of knowledge and expertise on the subject of historic vehicles in general.

The members of the Federation affiliated clubs possess a greater number and more extensive variety of historic vehicles, particularly those dating from before the Second World War, than in any other EU Member State. This reflects the different historical experiences of the UK, especially the absence of land war on its territory. Historic vehicles do not form a part of the contemporary transportation structure of the nation. The primary purpose of their journey is seldom the transportation of either goods or people from one point to another but is rather the movement of the vehicle itself. Such use is largely an incidental part of their preservation, enjoyment and presentation to the public and to those having an interest in mobile heritage.

We trust our response is clear and comprehensive but are ready to provide further details and supporting information on request, if required.

Yours Sincerely,

**D R Daniel**  
**Legislation Manager, FBHVC**



## **Bath Clean Air Zone Consultation 2019**

### **General**

Bath is a city with an extensive Heritage environment, and in addition sits on an important thoroughfare between the Midlands and the South West. Historic vehicle owners are generally likely to avoid using the motorway system and are more likely to use the main through routes which also pass through the proposed Clean Air Zone. Bath's Heritage buildings and environment are also as a consequence more likely than some cities to attract heritage events including Historic Vehicles.

The Federation is not opposed to this proposal, but nor does it consider the vehicles of those it represents pose any threat to the operation or effectiveness of any Bath Clean Air Zone.

Use of historic vehicles within any Clean Air Zone will be very limited, confined to journeys made by any vehicle owners who may live within the Zone, journeys to achieve access to businesses within the Clean Air Zone which carry out maintenance on and repair of historic vehicles, and transit across the Zone to reach an event or to participate in an event with a cultural and heritage theme within the Zone. Such events themselves will be rare occurrences.

Based upon data established by the Federation in its 2016 National Historic Vehicle Survey, the Federation calculates that there are approximately 540,000 historic vehicles, located across the entire area of Great Britain. As historic vehicles are estimated to cover only 0.21% of total vehicle mileage in Great Britain, and as most historic vehicles rarely travel outside their immediate geographical base, only a very small proportion of that total will ever need to take advantage of the exemption in any individual Clean Air Zone. As a result, the impact on in the Bath Clean Air Zone will be insignificant.

### **Exemptions**

We note the proposal includes a general automatic exemption for Historic Vehicles. This is welcomed. We would note however that some of our members have been heavily involved with Leeds City Council in the preparation of their Charging Order. There is a particular issue relating to Historic and near-Historic buses.

### **Buses – special issues**

Mandatory changes to the UK's bus fleet have resulted in the early retirement of many buses and without saving examples and preserving them, a large group of buses representing a significant period in transport history would be scrapped and lost. Historic buses are a class of vehicle which may well wish to travel within the CAZ to support an event. For example – one bus museum in the Birmingham area operates a service with its historic buses to transport visitors to the museum to and from the city century travel hubs on its open days, and there is at least one open-topped bus tour company operating in Bath.

The Federation would point out that there is a small number of buses and coaches which are entitled by reason of their age to be in the historic taxation class but which for regulatory reasons are registered as Public Service Vehicles. These vehicles are used solely for "heritage" work on an occasional basis. They are not normally present in times of congestion, do very small overall mileages and thus do not contribute significantly to pollution levels. As a historic city, Bath may be expected to have occasional events at which the presence of such vehicles might be thought to be beneficial.

In discussions with Leeds, an additional exemption in their charging order was constructed. We feel it would be beneficial to incorporate this in the Bath Charging Order too, in order to allow limited use of "vintage buses" within the Charging Zone. This also recognised that buses older than 20 years are able to carry disabled passengers, allowing events to fulfil their Equality obligations by using these "near-historic" vehicles.



An alternative would be to provide a general “special exemption” option by application to allow the Council to include other vehicles in the Register as “non-chargeable” either temporarily, permanently, with restrictions, or other limitations, where these are considered desirable for Heritage reasons and have no significant impact on the Council’s aims.

### **Extract from the Leeds Charging Order**

#### **“Vintage buses**

- 4.(1) A vintage bus is a non-chargeable vehicle on an eligible non-chargeable day provided particulars of the vehicle are entered in the register on the eligible non-chargeable day concerned.
- (2) In this paragraph—
  - (a) “vintage bus” means a vehicle of Class M<sub>3</sub> that
    - (i) at any time during a given financial year was constructed more than 20 years and less than 40 years before 1 January in that financial year; and
    - (ii) is not used on a designated road for hire or reward or for or in connection with a trade or business;
  - (b) “eligible non-chargeable day” means each of the first 10 charging days in any financial year on which a vintage bus is used on one or more designated roads;
  - (c) “financial year” means a period of 12 months beginning with 1 April.
- (3) An application to enter particulars of a vintage bus on the register must—
  - (a) include such information relating to the age, construction and use of the vehicle as the Council may specify on its website, and all such other information as the Council may reasonably require; and
  - (b) be made by such means as the Council may accept.”

### **Historic Vehicle Definitions**

The internationally recognised definition of a historic vehicle is 30 years. Owners of the small number of vehicles built between thirty and forty years ago which are likely to be in the Bath area may be expected not to change their vehicle, which will be little used, but will retain them until they become exempt. The Federation would request that the Council give consideration to preferential treatment to these vehicles, which will generally be in the course of preservation, though they have not become of an age to qualify for exemption from Vehicle Excise Duty.