



**Clean Air For Bristol
Bristol City Council
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Federation of British Historic Vehicle Clubs (FBHVC)

Response to Consultation on

**Clean Air
for Bristol**

BRISTOL TRAFFIC CLEAN AIR ZONE

Submitted 11 December 2020

INTRODUCTION

Bristol Traffic Clean Air Zones Consultation

Consultation Response

The Federation of British Historic Vehicle Clubs ("The Federation") submits this response to the Consultation on the Bristol Traffic Clean Air Zones ("the Consultation"). This response is submitted by e-mail rather than completion of the on-line survey as the majority of questions are not relevant to or stray beyond the focus of the Federation.

The Federation references its previous response submitted in relation to the 2019 Consultation on Bristol Traffic Clean Air Options.¹

General

Bristol City Council will be aware from the Federation's previous response that it is a national organisation with member clubs across Great Britain. It may be worth rehearsing that the Federation represents over 540 member clubs in Great Britain with a total membership of over a quarter of a million historic vehicle owners and enthusiasts. Vehicles owned by members of the Federation include historic vehicles of many kinds; cars, motorcycles, buses, coaches, lorries, vans, utility vehicles, military vehicles, tractors and other agricultural vehicles and steam engines. Historic vehicles are recognised as representing an integral part of British cultural heritage. 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. 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.

¹ Federation Response dated 12/08/2019

This interest in historic vehicles sustains economic activity worth £7.2 billion annually to the British economy and supports the employment of nearly 35,000 people (including in Bristol and South West).

Historic vehicles in total are estimated to cover only 0.21% of total vehicle mileage in Great Britain, and most historic vehicles rarely travel outside their immediate geographical base. Only a very small proportion of the total will ever need to take advantage of any exemption in the Bristol area and the comments and concessions sought below relate to a very small number of vehicles for relatively few days in a year.

Background

The Federation does not oppose the establishment of zones or areas which enhance air quality. It confines comment to any aspects which might affect the ability of historic vehicle operators to use their vehicles unrestricted.

As stated above, the Federation has already responded to the earlier consultation on Bristol Traffic Clean Air Options, principally to ensure that the exemptions contained in paragraph 3.8.1 of the DEFRA Draft Clean Air Framework of October 2016 in respect of historic vehicles would be included in any implementation of the final proposals.² Although it received no specific response to that request, the Federation noted and welcomed the fact that in Part 5 of Bristol City Council Online Business Case 2 and Section 3 of the Online Business Case 17 both published in October 2019 ("OBC17"), the automatic exemption for historic vehicles was acknowledged.³

Current Consultation

The Federation notes and has no observations to make on the rationale for the fresh consultation.

² https://consult.defra.gov.uk/airquality/implementation-of-cazs/supporting_documents/161012%20%20Draft%20Clean%20Air%20Zone%20Framework%20%20consultation.pdf

³ <https://democracy.bristol.gov.uk/documents/s42633/BCC%20CAZ%20OBC%20%20-%20Executive%20Summary.pdf>.

<https://democracy.bristol.gov.uk/documents/s42645/Appendix%20Ci%20-%20BCC%20CAZ%20OBC%2017%20-%20Clean%20Air%20Fund%20Proposal.pdf>

Whilst it does not take a formal position on which of the options is most appropriate should the need for their implementation arise, it does wish to make representations in relation to access and concessions for certain historic vehicles which may be affected particularly if it is decided to implement the larger CAZ C.

Thus the Federation considers no benefit would be derived from responding to all the questions in the online survey. For example questions related to replacement of non-compliant with compliant vehicles or the provision of finance for their conversion are not relevant to the historic, heritage or preservation community nor the finance schemes on offer. It is not considered technically feasible to retrofit historic vehicles with emissions abatement equipment and even if it were, the same would involve an unacceptable level of intrusion into the historic fabric of a vehicle. An historic vehicle is presented in 'period' condition in order that the public can see and experience vehicles of the past, this period condition typically extending to engines and other components.

At a national level, the Federation is leading initiatives around the carbon footprint of our movement and has recently appointed an Environmental Director to lead on issues such as carbon offsetting.

This response will therefore confine comments to:

- a. Confirming that the automatic exemption for vehicles in the historic vehicles taxation class (DEFRA definition) will apply to any charging regime.
- b. Raising the issue of a limited group of historic vehicles over 30 years old (but less than 40) which are therefore not within the historic vehicles taxation class and but may be affected by the larger CAZ C.
- c. Addressing disability access to historic vehicles and participation at heritage events.
- d. Responding to Questions 5 and 7 concerning the CAZ options and Question 11 regarding exemptions and concessions.

Comments summary

The clean air exemptions set out in the DEFRA Draft Clean Air Framework of October 2016 are based on vehicles within the historic vehicles class. Vehicles qualify for that class based on their being more than forty years old on a rolling basis. However the international measure of a historic vehicle, recognised by both FIVA and UNESCO, is that the vehicle must be at least **thirty** (not forty) years old, a standard that Scotland has adopted for its proposed Clean Air Regulations under the Transport (Scotland) Act 2019.

The Federation observes that the “working lives” of heavier commercial vehicles such as **buses and coaches** are normally shorter than is the case with cars and motor cycles and accordingly are withdrawn from use or put into preservation at a much younger age.

The Federation notes that this preservation task will be made more challenging if these heavier vehicles, on the cusp of entering the historic tax class, are subject to the full daily rate charge of £100. In the case of such buses and coaches, historic by International standards and on the cusp of becoming historic in terms of UK VED, the practical effect of paying the fully daily charge would be to make more challenging the possibility of using a historic vehicle in those categories anywhere within Bristol CAZ C. Noting that preserved buses are very occasionally used on rare special events to transport passengers from transport hubs to museums or historic vehicle shows, a CAZ C which encompasses Bristol Temple Meads railway station would penalise the use of preserved buses or coaches for these purposes unless allowance was made. The Federation therefore proposes that so long as they are no longer in commercial service, in preservation and conforming to the international measure of historic, these “younger vehicles” should enjoy a concession from the daily charge.

Noting that this category of 30 plus years has not so far been recognised in OBC 17, the Federation now requests consideration be given to their inclusion in the list of those vehicles entitled to a local concession.

In addition, the Federation proposes an additional small category of historic buses less than 30 years old but greater than 20 years old in order to make appropriate provision for disabled and senior citizens whose access to and participation in historic vehicle events would otherwise be constrained.

RESPONSE

Q5: Do you agree or disagree that 2020 option 1 is a good way to improve air quality in Bristol?

Q7: Do you agree or disagree that 2020 option 2 is a good way to improve air quality in Bristol?

A to both: The Federation expresses no preference on either option. In respect of Option 1 (CAZ D) it does not propose any exemption beyond that in the DEFRA definition (see footnote 2) on the basis this zone is small and that it remains possible for non-compliant vehicles to access Bristol Temple Meads Station and other areas on the fringes of the city. However in respect of option 2 (which would be a category C CAZ with a larger area), it makes the proposals set out in answer to Q11.

Q11: Which of the following groups do you think should receive an exemption or concession, or pay the full charge?

A: See below in respect of :

- a. Vehicles with a 'historic' vehicle tax class.**
- b. Certain historic vehicles older than 30 years.**
- c. Buses not in commercial service but less than 30 years old in heritage use with disabled access.**

a. Historic Vehicles older than 40 years

The Federation welcomes the OBC 17 indication that in the event of either Zone being implemented, the normal exemption for historic vehicles more than 40 years old will apply.

b. Historic Vehicles older than 30 years

No exemption or concession is sought for this category of historic vehicle in the event of Option 1 being implemented.

However in the event of Option 2 (CAZ C and D) being chosen, as indicated in the **Comments Summary** paragraph above, the Federation proposes that a limited class of historic vehicles older than 30 years (but not yet 40) should enjoy a concession in relation to a daily charge of £100 for entry into that larger zone. It notes that other local authorities commonly grant local exemptions or concessions/discounts for privately owned HGVs (PHGVs), a category mainly directed at motorhomes and horse boxes. The Federation presumes that because of their small numbers, limited use, social benefit and the disproportionate effect of a charge, justifies an exemption or concession.

Similar conditions pertain to the small numbers of “younger” historic buses and coaches referred to earlier. In addition they are in preservation and conform to the international measure of historic vehicles. The Federation would request a similar discount for them and proposes the following be included in the list of local concessions:

"Buses, coaches and vehicles >3.5t over thirty years old, not involved in a commercial activity and in "heritage" use".

If such an open ended concession was not accepted, the Federation would propose a similar registration scheme as that set out in paragraph c below in respect of disabled access buses whereby a limited number of concession days are granted each year.

c. Disabled Access Buses

The Federation considers it important from an equality and diversity perspective that the less able and senior can participate in historic vehicle and specifically historic bus events. The design and construction of historic buses more than 30 years old makes access for them difficult and sometime impossible for certain people. Not until the mid 1990s were buses with a low floor and a wheelchair ramp introduced to the UK for the first time. Some of these early low floor buses (dating approx. 1994 to 2001) have been withdrawn from commercial service and have entered the world of preservation.

This has meant that when historic bus events have been organised for the general public, those in wheelchairs have been able to enjoy a ride on a bus of yesteryear (albeit the fairly recent past) sometimes for the first time. Payment of the full daily charge by these bus owners would increase the level of the already challenging costs of preserving and running these buses and might result in their being withdrawn from use. It would be a matter of profound regret and contrary to broader equality and diversity aims if the historic bus community in the Bristol area had to go back to the days of catering for able-bodied persons only.

To allow activities such as bus shuttles from Bristol Temple Meads to historic events or museums in the event of Option 2 being implemented, the Federation asks that consideration be given to the scheme proposed by the City of Leeds in its CAZ to deal with such vehicles. This would require them to register and upon successful application, to allow them access the city for a limited number of days per year. The Federation would request a similar discount for them as for over 30 year old buses and proposes the following in the list of concessions:

"buses and coaches less than thirty years but more than 20 years old, not involved in a commercial activity, in "heritage" use, with a wheelchair ramp/access and registered with the Council for [say 10] days per year".

Conclusion

The Federation stands ready to engage in further discussions with representatives of Bristol City Council on any or all of the points raised in this submission.