



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

Counsellor Anna Richardson
City Convener for Sustainability and Carbon Reduction
Glasgow City Council

5th April 2020

Dear Ms Richardson

Glasgow LEZ Consultation 2020

I refer to the proposal for Glasgow's Low Emission Zone and the current consultation exercise.

The Federation of British Historic Vehicle Clubs [FBHVC] wishes to respond to your consultation on behalf of our member clubs in Scotland and those who might visit Glasgow. Please find our response to your proposal appended.

Our comments do not easily sit in the on-line consultation questionnaire and are consequently forwarded in letter format. I would be grateful if you could forward them for consideration.

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



Glasgow Low Emission Zone Consultation 2020

General

Glasgow is a city with an extensive Heritage environment, and in addition sits on important thoroughfares. Historic vehicle owners are generally likely to avoid using the motorway system and are more likely to use the main through routes which may also pass through the proposed Low Emission Zone. Glasgow's Heritage buildings and environment are also as a consequence more likely than some cities to attract heritage events including visits by Historic Vehicles.

We specifically note the local presence of the Glasgow Vintage Vehicle Trust on the Eastern edge of the city centre. GVVT have a large bus museum, with a collection of other vehicles. They do run vintage and classic buses into and through the city centre and would be affected by this Low Emission Zone.

GVVT will we understand be making their own submission with a view to obtaining special exemptions for their Heritage activities, which we believe the Council will be empowered to grant, should they choose to do so. This is noted later in our response.

Transport Scotland Act and Regulations

The Federation has been active in responding to the Scottish Government's proposals for Low Emission Zones, and has recently responded to the proposed Regulations, supporting the option for vehicles over the age of 30 years to be exempted, this being the Internationally-recognised definition of a Historic Vehicle.

We have also supported the option for local short-term exemptions to deal with special situations which might include Historic Vehicle activities.

Unfortunately, the consultation on these Regulations has only just completed and there has not been time to confirm whether these exemptions will be included, although this is anticipated.

If the "30 year" exemption were not included, Federation clubs and their members would have serious concerns in respect of any Low Emission Zone and Glasgow would not be legally able to introduce such an exemption themselves.

Vehicle owners might, for example find themselves and their beloved historic vehicle "marooned" inside a zone, or unable to drive it to attend Heritage events.

In such circumstances, the Federation would be fundamentally opposed to the introduction any Scottish Low Emission Zone.

The Glasgow Low Emission Zone Proposal

The Federation is not opposed to this proposal, subject to the proposed exemptions in the Transport Scotland Regulations being fully incorporated in the final Regulations. In such circumstances, vehicles within our remit – more than 30 years old – would be fully exempted.

Use of historic vehicles within any Clean Air or Low Emission Zone will in any event 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 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 or Low Emission Zone. As a result, the impact on in the Glasgow Low Emission Zone will be insignificant.

Buses – special issues

There is a particular issue relating to Historic and near-Historic buses.

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 Low Emission Zone to support an event. For example – The Glasgow Vintage Vehicle Trust operates services with its historic buses to transport visitors to the museum to and from the city centre travel hubs on its open days, and also traverses the City centre to attend rallies on the West of the city. A similar service operates in Birmingham, other bus museums, and there are various operators of open-topped vintage bus tours throughout the UK.

The Federation would point out that there is a small number of buses and coaches which 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, Glasgow may be expected to have occasional events at which the presence of such vehicles might be thought to be beneficial.

In discussions with Leeds, where this situation was first discussed, an additional exemption in their charging order was constructed. We feel it would be beneficial to consider the options for short term local exemptions in the Glasgow Low Emission Zone too, in order to allow limited use of “near-historic buses” within the Charging Zone, on the basis that buses older than 20 years (but less than 30 years old) are equipped to carry disabled passengers, allowing events and operators to fulfil their Equality obligations by using these “near-historic” vehicles, where these are considered desirable for Heritage reasons and have no significant impact on the Council's aims.

We would hope that Glasgow City Council would look favourably on applications for such short-term exemptions.