

Response ID ANON-N8Q9-SP2C-8

Submitted to **Clean Air Zone for Birmingham (consultation for organisations)**

Submitted on **2018-08-15 15:09:42**

About you (1)

1 What is the name of your organisation?

What is the name of your organisation?:

Federation of British Historic Vehicle Clubs

2 What is your name?

What is your name?:

Robert Owen

3 What is your job title/role in the organisation?

What is your job title/role in the organisation?:

Director - Legislation

4 What is your email address?

What is your email address?:

rowen13@uwclub.net

5 May we contact you further about this consultation and the Clean Air Zone?

Yes

6 Please tick to confirm you are authorised to respond on behalf of this organisation

I am authorised to respond on behalf of the organisation above.

About your organisation

7 What sector does your organisation fall into?

What sector does your organisation fall into?:

Arts, entertainment, recreation and other services

Other sector:

8 What is the postcode of your organisation's main site?

Postcode:

RM14 9DG

9 How many employees does your organisation have in Birmingham?

0 to 9

Your organisation's vehicles

10 Does your organisation own or lease any vehicles in Birmingham?

Our organisation does not use any vehicles

11 Thinking about the vehicles which you own or have on long term lease in Birmingham, roughly how many of each of the following do you have?

Motorbikes:

Petrol cars:

Diesel cars:

Other fuel cars (including electric, LPG, hybrid):

Petrol vans/minibuses (passenger vehicles with >8 seats, of <5 tonnes gross vehicle weight):

Diesel vans/minibuses (passenger vehicles with >8 seats, less than 5 tonnes gross vehicle weight):

Heavy Good Vehicles (lorries or specialist vehicles >3.5 tonnes gross vehicle weight):

Coaches/buses (passenger vehicles with >8 seats, of >5 tonnes gross vehicle weight):

12 Roughly what proportion of your current fleet would NOT be charged to drive in the proposed Clean Air Zone?

Roughly what proportion of your current fleet would not be charged to drive in the proposed Clean Air Zone?:

Though the Federation of British Historic Vehicle Clubs (the Federation) has answered none to Question 10 we feel the following information is essential to explain why we are submitting our response .

The Federation is a national organisation with member clubs across the United Kingdom.

The Federation represents over 540 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.

Furthermore historic vehicles represent an integral part of the cultural heritage of the UK.

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.

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.

Historic vehicles rarely 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. Such use is a purely incidental part of their preservation and presentation to the public and to those having an interest in mobile heritage.

Answers to later questions which are "don't know" or "no opinion" answers do not imply lack of interest but a view that our views on the question are outside the remit of our members and their interests.

About the Clean Air Zone (1)

13 How many sites does your organisation have?

In the proposed CAZ area:

0

In Birmingham but outside the proposed CAZ area:

0

Outside Birmingham:

0

14 Roughly how many vehicle trips per week are made in the proposed CAZ area as part of your organisation's operation?

Roughly how many vehicle trips per week are made in the proposed CAZ area as part of your organisation's operation? - I receive deliveries/collections to my organisation within the proposed CAZ:

Don't know

Roughly how many vehicle trips per week are made in the proposed CAZ area as part of your organisation's operation? - I supply goods and services to customers or service users in the proposed CAZ:

Don't know

Roughly how many vehicle trips per week are made in the proposed CAZ area as part of your organisation's operation? - I transport people or goods in or through the proposed CAZ (e.g. courier, haulier, taxi, bus, firm, ambulance):

Don't know

15 Do you have any comments on the proposed area of the Clean Air Zone?

Comments on the proposed area of the Clean Air Zone:

The Federation does not consider itself qualified to assess the area of the Clean Air Zone so offers no opinion

About the Clean Air Zone (2)

16 Which types of vehicle do you think should be included in the Clean Air Zone restrictions?

Which types of vehicle do you think should be included in the Clean Air Zone restrictions? - Buses and coaches:

Don't know

Which types of vehicle do you think should be included in the Clean Air Zone restrictions? - Lorries (HGVs):

Don't know

Which types of vehicle do you think should be included in the Clean Air Zone restrictions? - Taxis and private hire vehicles:

Don't know

Which types of vehicle do you think should be included in the Clean Air Zone restrictions? - Vans (LGVs) and minibuses:

Don't know

Which types of vehicle do you think should be included in the Clean Air Zone restrictions? - Cars:

Don't know

Which types of vehicle do you think should be included in the Clean Air Zone restrictions? - Motorcycles and mopeds:

Don't know

About the Clean Air Zone (3)

17 Buses and coaches

Please choose one:

Don't know/no opinion

18 Lorries (HGVs)

Please choose one:

Don't know/no opinion

19 Taxis and private hire vehicles

Please choose one:

don't know/no opinion

20 Vans (LGVs) and minibuses

Please choose one:

don't know/no opinion

21 Cars

Please choose one:

don't know/no opinion

22 Motorcycles and mopeds

Please choose one:

don't know/no opinion

23 Do you have any comments on which vehicles should be charged to drive in the Clean Air Zone and how much those charges should be?

Comments on which vehicles should be charged to drive in the Clean Air Zone and how much those charges should be:

The Federation wishes to use this question to comment not on which vehicles should be charged but on one aspect only of vehicles which should not be charged, i.e historic vehicles.

Use of historic vehicles within the Birmingham Clean Air Zone will be immensely rare, almost entirely 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.

There may also be the possibility of the provision of a small number of journeys by historic public service vehicles on "heritage" services, but it is assumed this would only occur by specific advance agreement with the relevant authorities,

Based upon data established by FBHVC 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.

These historic vehicles 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, so only a very small proportion of the total will ever need to take advantage of the exemption in any individual Clean Air Zone.

It is thus clear that any possible effect on the air quality in the Birmingham Clean Air Zone will simply not be of any statistical significance.

It is recognised that the Consultation Document already makes provision for the exemption of historic vehicles from the Birmingham Clean Air Zone. However, it offers no further clarification.

The Federation therefore wishes to bring to the attention of Birmingham City Council two matters which might help to inform the completion of the planning of the Birmingham Clean Air Zone.

The Consultation Document does not at this stage offer any information as to how the Birmingham Clean Air Zone might be managed and monitored.

The Federation is aware that there is precedent for utilising Automatic Number Plate Recognition (ANPR) Cameras for the purpose of monitoring and managing Clean Air Zones and for the levying of the charges for entry of vehicles subject to charge.

If an ANPR system were to be employed for the Birmingham Clean Air Zone the Federation would wish to make Birmingham City Council aware of two matters concerning historic vehicles.

1. The internationally recognised definition of a historic vehicle, enshrined inter alia in Directive 2014/45/EU of 3 April 2014 on periodic roadworthiness tests for motor vehicles, is that a historic vehicle is at least thirty years old. This criterion has been agreed upon by reason of the fact that it is extremely rare for any vehicle to become more than thirty years old unless it is its owner's intention that it be preserved.

However, the UK Treasury has adopted a policy of exemption from Vehicle Excise Duty of vehicles over forty years old. Thus DVLA has created a taxation class of "Historic Vehicle", which is already in use as the basis of exemption (e.g. the London T-Charge). But the Federation considers it ought to be possible to recognise the thirty year exemption by reference to DVLA data on the year of manufacture and would request that this approach be taken by Birmingham City Council.

2. It is presumed that the charging regime criteria adopted would apply equally to vehicles not registered in the United Kingdom. The Consultation Document does not yet define how the Clean Air Zone will recognise which vehicles not registered in the United Kingdom should be subject to a charge.

The Federation attempts to achieve reciprocity with neighbouring countries in matters of historic vehicles. Thus the Federation seeks a method of exempting from charges for entry into the Clean Air Zone vehicles recognised as historic by their country of registration. The Federation understands that there might be problems with achieving automatic management of this exemption and would be happy to work with the City of Birmingham to work out a solution, as it is currently doing with TfL in respect of the projected London Ultra Low Emissions Zone. The Federation does recognise that this might involve some advance notice and permit system, but thinks it fair to assume that the incidence of foreign historic vehicles wishing to enter the Birmingham Clean Air Zone will be very rare.

How the Clean Air Zone affects you

24 If a Clean Air Zone was introduced what do you think would be the overall impact for the following?

If a Clean Air Zone was introduced what do you think would be the overall impact for the following? - Your organisation:

Negative

If a Clean Air Zone was introduced what do you think would be the overall impact for the following? - The health of people in Birmingham:

Don't know/no opinion

If a Clean Air Zone was introduced what do you think would be the overall impact for the following? - Businesses in Birmingham:

Don't know/no opinion

If a Clean Air Zone was introduced what do you think would be the overall impact for the following? - Birmingham as a city:

Don't know/no opinion

25 Please explain the overall impact you think a Clean Air Zone would have for your organisation and for Birmingham and the people who live, work and study here.

Please explain the overall impact you think a Clean Air Zone would have for you and your family and for Birmingham and the people who live, work and study here?:

The Federation wishes to use this question to reiterate the following

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.

It is thus clear that any possible effect on the air quality in the Birmingham Clean Air Zone and this the health of the citizens of Birmingham will simply not be of any statistical significance.

Conversely a proper approach to exemption will enable Birmingham to participate without unnecessary restriction in any future events or activities, which would no doubt be rare, within the Clean Air Zone which might be held in order to celebrate the British heritage including mobile heritage over more than a Century in which Birmingham played such a significant part.

Support for organisations and individuals

26 To what extent do you agree or disagree that there should be extra support for the following people?

To what extent do you agree or disagree that there should be extra support for the following people? - Small and medium sized enterprises operating in the CAZ area:

Don't know/no opinion

To what extent do you agree or disagree that there should be extra support for the following people? - Larger businesses and organisations operating in the CAZ area:

Don't know/no opinion

To what extent do you agree or disagree that there should be extra support for the following people? - Businesses and organisations outside the CAZ area:

Don't know/no opinion

To what extent do you agree or disagree that there should be extra support for the following people? - Taxi operators:

Don't know/no opinion

To what extent do you agree or disagree that there should be extra support for the following people? - People living in or close to the CAZ area:

Don't know/no opinion

To what extent do you agree or disagree that there should be extra support for the following people? - People with limited income:

Don't know/no opinion

To what extent do you agree or disagree that there should be extra support for the following people? - Disabled people:

Don't know/no opinion

To what extent do you agree or disagree that there should be extra support for the following people? - People attending worship in the CAZ area:

Don't know/no opinion

To what extent do you agree or disagree that there should be extra support for the following people? - Parents and guardians of patients at Birmingham Children's Hospital:

Don't know/no opinion

27 Do you have any comments on the type of support which could be provided, and who it should be for?

Comments on the type of support which could be provided, and who it should be for:

28 If a Clean Air Zone was introduced do you think your organisation would need extra support?

Please choose one:

No

29 If you answered 'yes' to the previous question, what kind of support do you think you would need and why?

If you answered 'yes' to the previous question, what kind of support do you think you would need and why?:

What else?

30 Is there anything else which can be done to improve Birmingham's air quality?

Is there anything else which can be done to improve Birmingham's air quality?:

About this consultation

31 Do you feel that the information provided has enabled you to make an informed comment on the proposals?

Yes

32 What additional information would have helped you to comment on the proposals?

What additional information would have helped you to comment on the proposals?:

More information on the intended detail of historic vehicle exemption intended, together with a better understanding of enforcement methods proposed, would have helped, though it is understood that detail may be expected later in the planning stage..

The Federation would be most willing to contribute from the point of view of the historic vehicle community to any debate within Birmingham City Council as to what this method and extent ought to be .