

Q1(a) Do you agree with the present proposed emission standards for Scotland's LEZ's?

We have no view on this as our member's vehicles are likely to be the subject of a specific exemption.

Q1(b) What are your views on Scotland making a transformative shift to zero or ultra-low emission city centres by 2030?

We recognise the aspirations of this shift but would hope that heritage issues remain recognised, and that Historic Vehicles retain their exempted status.

Q2 (a) which of the proposed National Exemptions do you agree with?

We would wish to see the exemption for Historic Vehicles incorporated. We are particularly pleased to see the FIVA 30 year criteria utilised by Scotland as a benchmark. Apart from being internationally recognised, this avoids some issues created with the proposed English CAZ and LEZ which stem from the adoption of tax exempt status as benchmark as some historic vehicles are not tax-exempt.

The footnotes in the consultation (note 14) makes it clear the legislators are already aware of the Heritage justifications for our support for this exemption, and we will not repeat these in detail in our response. The note points out that Historic Vehicles [FIVA 30 years] account for a mere 2.13% of the total UK vehicle population. To that we would note that they are also likely to have some of the lowest annual mileages of any vehicle group, further minimising their environmental impact.

Q2(b) Are there any other LEZ exemptions you would propose?

We believe that offering the option to allow low frequency travel vehicles to be exempted on a time-limited basis would be beneficial. On occasions heritage events and activities may include "classic" and "near-historic" vehicles which are not yet 30 years old. Some classic buses have moved to being preserved early as a result in demands for disability adaptations on all commercial buses, and which cannot be "retro-fitted". In addition, Historic vehicles may also be "trailed" to rallies – a practice which results in the use of a lesser-polluting modern vehicle. A time-limited exemption option would allow for such eventualities, whilst not contributing significantly to emissions.

Q3(a)-(d) – Penalty Charges

We have no view on this matter, subject to Historic Vehicles being excluded.

Q4 – Enforcement Regime

Our only views on this matter are that there should be an accurate system to check a vehicle's status. The London ULEZ scheme has an on-line checking system but this does on occasions return errors leading to uncertainty for drivers using it.

We would also note that the regime and the Historic Vehicle exemption may need to cope with non-UK vehicles and their drivers neither of which would be registered with DVLA. These may represent a very small proportion of any Historic Vehicle emission impact, which itself is extremely low. This may well be already have been considered by the authors but is not noted in the consultation.

Q5 What are your views on the "other persons" that a LA must consult over its plans?

As suggested by the footnote, if 30 year old vehicles are excluded, and since our remit extends only to "Historic Vehicles" as defined by FIVA as 30 or more years old, our need to be involved in consultation would be negated. The proposal that "advisable other persons" which would include

Historic Vehicle organisations be included in guidance would seem to ensure that any necessary consultation would not be excluded.

Q6 – LEZ reviews

We have no view on this matter.

Q7 – Secondary objectives

We have no view on this matter

Q8 – Procedure for bringing schemes into effect

We have no view on this matter.

Q10 – Impact on vulnerable persons

We have no view on this matter.

Q11 – Costs to Business

We have no data on this matter.

Q12 – Data Protection

We are confident that the proper application of GDPR would protect personal data

Q13 – Impact on the Environment

We have no data concerning this matter

Q14 – Other comments

We have no other views on these matters