



"... to uphold the freedom ..."

# CONSULTATION RESPONSE

EC Consultation on "A Sustainable Future for Transport"  
Department for Transport  
1/31 Great Minster House  
76 Marsham Street  
London  
SW1P 4DR

3 September 2009

Dear Sir

The FBHVC represents almost 500 subscriber organisations in the UK that between them have some quarter of a million enthusiasts for historic vehicles of all types. We ask you to bear in mind the large number of people we represent when considering this response.

For the purposes of this consultation response we consider an historic vehicle to be one that is over 30 years old and our main concern is with vehicles of that age group. A major survey throughout Europe by the Fédération Internationale des Véhicules Anciens indicates that although currently less than one per cent of vehicles on the European roads are historic and the annual distance travelled by them is less than one per cent of total circulation this movement is worth €3 billion to the EU annually. This means that the environmental impact of historic vehicles is minimal, while their contribution to the economy is substantial.

We do not object to this submission being published or disclosed.

Our comments are of a general nature. We hope that the Department for Transport will bear in mind the continuing need to consider the impact of legislation on historic vehicles, and the need for specific exemptions in some instances to avoid unintended and possibly severe consequences for their use.

We trust that the Department of Transport will continue its longstanding and enlightened policy of not making any technical requirements on vehicles apply retrospectively, and bear that policy in mind when considering EU proposals. One area of recent concern in particular has been ITS. It is pleasing to note that the EU have already recognised that historic vehicles are often incompatible with the retrofitting of modern electronic devices such as ITS and historic vehicles were specifically exempted by the European Parliament Transport Committee from the Action Plan on ITS in March this year.

We also have concerns about low emission zones linked to the congestion charging areas mentioned in the paper. A small minority of Federation members who keep historic commercial vehicles within the London LEZ are seriously disadvantaged as they are unable to modify their vehicles to meet the emission requirements and are thus disproportionately charged large sums of money to move their vehicles very short distances. Such vehicles are not used for hire or reward but usually for charity events and displays. We suggest that a rolling 30 year exemption from the legislation in such cases would not significantly affect the environment or



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the revenue collected by local authorities and would encourage the preservation of motoring heritage for all to enjoy.

A problem that we understand is arising elsewhere in the EU is that different cities may have put into place different detailed regulations applying to their own particular LEZs. While these may be understood by local inhabitants, it can make life very difficult for those travelling between areas. We should like to make a plea for uniform regulations for LEZs, certainly within countries and preferably throughout the EU. Model regulations would aid individual areas when setting up zones, and ensure that possibly more obscure provisions such as exemptions for historic vehicles were not overlooked when drafting regulations for new zones.

Yours faithfully

Rosy Pugh  
Secretary