

NARTM

NATIONAL ASSOCIATION OF ROAD TRANSPORT MUSEUMS

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Sent by email: 3rdDirectiveConsultation@dft.gsi.gov.uk

Dear Sir

Directive 2006/126/EC – Implementation of the Third Driving Licence Directive

I am writing on behalf of the National Association of Road Transport Museums which is the umbrella body for transport museums and collections primarily involved in large 'commercial' vehicles (buses, coaches, goods vehicles, emergency services and public utility vehicles). We have been alerted by the Federation of British Historic Vehicle Clubs (FBHVC) to your consultation regarding the Third Driving Licence Directive which makes a very oblique and apparently well camouflaged reference to withdrawal of exemptions which currently allow drivers with Class B licences to drive large vehicles (Annex G Paragraph G13). We are extremely concerned by the potentially devastating impact which we believe this will have on the heritage transport movement in the United Kingdom and fully support the submission by the FBHVC. We would certainly wish to be involved in the potential meeting with you requested urgently by the FBHVC. We urge you also to take serious note of the following additional information.

We have some 85 member organisations which include large public sector museums such as the London Transport Museum, Coventry Museum of Transport, Milestones and the National Tramway Museum; third sector (charitable) museums such as East Anglia, Manchester, Oxford, Wythall (Birmingham), and the Scottish Bus Museum at Lathalmond; and also many significant and valuable private collections.

NARTM has developed a database of preserved buses and coaches which contains details of more than 4200 vehicles. This is refreshed annually by direct contact with owners and is therefore very reliable. We also have other information some of which is not able to be checked on such a regular basis, but which, nevertheless indicates that the total 'national stock' of preserved buses is in the region of 7000-7500, of which more than one third are owned by NARTM members. Clearly we are in a position to provide authoritative information on this subject.

Of the national stock, the vast majority are never used to carry more than 8 passengers and in most cases fewer, as their primary use on the public highway is to attend rallies and shows, not to transport passengers. However, when these vehicles are seen out and about, either on the road or at show grounds, they attract great and enthusiastic interest from the general public. Funding bodies such as HLF are clear that moving, working large heritage objects are popular with the public and attract all

strata of society to engage in activities relating to British heritage. Furthermore we are able to state that approximately 25% of the national stock is under active restoration with a view to being run and exhibited to the public in the future with a further 25% awaiting restoration with the same outcome in mind. The remaining 50% are already restored and a significant proportion of these regularly attend events. The investment involved can be conservatively estimated at £25,000 per vehicle, perhaps £150-200million in total.

We have recently started to collect information on driver qualifications, driving experience and accident records in order to be able to respond with authority to the ever creeping regulatory incursions into our rights to pursue our hobby and, in the case of professional restorers, our livelihoods. We believe that a conservative estimate of the number of drivers and/or vehicle owners who would be prevented from enjoying their hobby if the proposed regulatory changes were currently in force would be of the order of 2000. While we recognise that it is not presently intended to apply these changes retrospectively, we are very concerned about the future when drivers will be subject to these new restrictions and, consequently, when many will find the cost of pursuing their hobby to be prohibitive. This will ultimately impact the value of the vehicles and their continuing existence and will drive out the enthusiasm for and interest in such heritage. The large investment in personal time and money is inspired by the prospect of being able to drive these vehicles on the road. Under your proposals around 200 additional people (and vehicles) per year would be adversely affected – a small number of people perhaps but a significant and growing part of the national heritage.

We note that there is no attempt to present a risk assessment or impact assessment of these changes, nor are there any questions within the consultation document specifically addressing this issue. Risks associated with the current exemptions are negligible and accidents very rare so there can be no quantifiable benefit resulting from the changes. However they will impose significant costs which are therefore beyond being disproportionate and can only be described as totally unjustifiable. Furthermore these changes do not meet any of the policy criteria stated on page 69 of your consultation document, namely that the new arrangements should be simple and easy to follow, facilitating compliance, cost effective, risk based and supported by stakeholders. In fact, none of these apply. The present arrangements, whereby vehicles carrying more than 8 passengers require a Class D licence holder provide the flexibility for a wide range of people to be involved and result in a very high degree of compliance and stakeholder buy-in. NARTM publishes guidelines for operation of heritage buses which make this distinction absolutely clear.

Therefore we trust that you will respond positively to our serious concerns and ensure that these exemptions remain in force. We look forward to the opportunity to discuss this in full with you at the meeting proposed by the FBHVC.

Yours faithfully

Dr Colin Billington
Deputy Chairman
National Association of Road Transport Museums