

# Response to DEFRA's consultation on cleaner domestic burning of solid fuels and wood

# The Heritage Alliance

**20<sup>th</sup> August 2018**

DEFRA has published a draft consultation on cleaner domestic burning of solid fuels and wood, designed to outline the government's approach to reducing domestic air pollution. The strategy is open to the public for consultation between 17<sup>th</sup> August – 12<sup>th</sup> October 2018.

More information on draft Clean Air Strategy can be found here:

<https://consult.defra.gov.uk/airquality/domestic-solid-fuel-regulations/>

The Heritage Alliance has written a statement on behalf of its members, and below we have included the questions deemed important to the sector.

## **Section 3 – Coal**

**14) Do you agree or disagree that government should phase out the use of traditional house coal for domestic combustion?**

**18) If you disagree, which of the following should apply? Please select all the options you believe should apply.**

**20) Would you like to provide any further comments or evidence on our proposals or the questions in this section?**

While we recognise that this has not currently been proposed, some Alliance's members are concerned that the Government may seek to further reduce the burning of coal in the UK, and that mobile heritage activities may be terminally damaged as a result.

The case against such a move has been outlined below by The National Traction Engine Trust ("NTET"), established in 1954. It is held in high esteem as the umbrella organisation for the steam traction movement, with affiliations held by over 30 organisations in the UK and worldwide including the Road Locomotive Society, the Road Roller Association and many regional clubs and associations. The NTET itself is affiliated to the Federation of British Historic Vehicle Clubs and the Heritage Railway Association.

Worldwide membership is active in Ireland, Switzerland, Germany, France, Sweden, the Netherlands, Australia, New Zealand, Canada and the USA. Interest in membership is growing in many other countries.

The NTET members own most of the 3000 approximate surviving steam road engines in the UK, many of which are in working order and steamed at rallies and on public roads across the UK every year. All are designed to burn steam rather than household coal. Large rallies are attended by millions of visitors a year, many from overseas, but NTET members also rally their engines at village

fêtes, fairs, agricultural shows, weddings, schools and other public or fund-raising events. They are an inspiration to young and old and help to attract apprentices into the engineering profession.

#### **The case for allowing steam road vehicles to continue burn steam coal:**

1. The pollution from coal-burning engines is *de minimis* when compared with pollution from other domestic, agricultural and industrial sources. Annual sales of steam coal amount to very few tonnes; Welsh dry steam coal has about 50% of the volatiles, at a maximum of 20%, compared with the bituminous coal used for coalfired power stations, maximum 38%
2. The NTET never receives substantial complaints about coal-burning road vehicles. Indeed, many particularly like the smell and sight of coal smoke from engines.
3. It is unusual for steam road engines to work in the cities where pollution from other emissions is at its highest. We note that Historic Vehicles are exempted from complying with the Transport for London Low Emission zone: <https://tfl.gov.uk/modes/driving/low-emission-zone/check-if-your-vehicle-is-affected/exemptions-and-discounts> and will be exempted when the more stringent regulations apply after October 2020.
4. Banning coal burning road vehicles would have a minimal environmental benefit and no appreciable benefit to public health given the low volume coal consumed. It would be a token gesture, causing more harm than good. It would stop a successful public, world-leading entertainment business, especially in rural areas, and reduce these important and popular survivors of our industrial heritage to the level of static and lifeless museum exhibits with limited appeal in an age where the experience economy is growing. It would be unpopular with voters of all persuasions.
5. Post Brexit, the UK may have the opportunity to re-assert greater independence and individuality, and the steam traction engine movement is a potent symbol of what we have that is different and distinguished, giving great pleasure to a wide range of the population. At some point there may be pressure from the EU or elsewhere to ban coal burning in the road, but there is nowhere in the EU or the rest of the world that has a national collection to compare with our traction engines. They are a good example of a special case.
6. The British government must robustly protect and preserve us in the same way as it has with other distinctive elements of British life, such as driving on the left, the pint glass and allowing steam locomotives such as the Flying Scotsman to run on special trains on the main railway lines

#### **Next step**

Representatives of the heritage transport bodies, including the Heritage Railway Association, would like to meet officials for a more detailed review of the merits of the above case.

The consultation gives no definition of 'domestic' but makes frequent reference to the 'home'; to alleviate fears from the mobile heritage sector, a definition could clearly exclude for example the personal use of steam vehicles.

#### **Section 9 – Additional suggestions**

##### **Do you have any additional comments/views that you wish to provide on the content of this consultation?**

The consultation is vague on what these comprehensive new powers for local authorities will be in terms of banning and regulating the use of certain fuel types. A framework should ensure that they

are used appropriately and are not applied without consultation. Local powers should not be able to require the removal of items from buildings which could potentially cause air pollution, as this could lead to the destruction of the historic fabric. For example, powers should not indirectly compel the removal of historic fireplaces from buildings.

Some larger historic houses may not be able to undergo a process of modernisation without harming that which renders them noteworthy. To this end, it is important to recognise that they may require the use of old technologies for heating and other basic functions. Giving power to local authorities means that local variations and differences when they are used, to minimise the effect this may have on heritage and there should be clear exemptions where appropriate.