



**Consultation on draft regulations to implement fine particulate matter air quality targets, February 2026**

## About us

The Heritage Railway Association is the UK-wide trade body representing heritage railways, tramways, cliff railways, museums and rolling stock owners. We take a leading role in developing best practice while acting as the voice of the sector by enhancing relationships within the industry, government and regulators.

Our 300 members range from lengthy heritage railways operating historic steam locomotives, to short electric tramways and even miniature lines, plus national institutions such as the National Railway Museum, home of 'Flying Scotsman'. Together they play a vital role in conservation, tourism, training and regeneration across the length and breadth of the British Isles.

## Why heritage rail matters

Heritage rail is a key part of the UK's cultural heritage and visitor economy. It attracts more than 13 million visitors each year and directly generates over £600m to the economy, plus significant associated PR and other indirect economic benefits. The sector employs more than 4,000 people and runs trains over nearly 600 miles of track which feature some 460 stations.

- Heritage rail is an important component of the tourism industry, generating local, national and international value to the UK visitor economy
- It is a key, bookable, element of holidays taken by many tourists
- The sector protects, conserves and brings to life part of the nation's cultural heritage, giving enjoyment and learning to many people
- It preserves and operates national heritage icons used to promote the UK around the world
- Heritage rail provides social, community and wellbeing benefits to employees, volunteers and visitors from the south coast of England to the far north of Scotland
- A heritage railway is often the anchor attraction visitor attraction in many holiday destinations
- It creates jobs and greatly supports local and regional supply economies

If you've been to see *Flying Scotsman*, taken your family on a steam train to see Santa Claus, used a seaside funicular, or taken a vintage tram at a museum – that's heritage rail.

## Our response

**Question 1a: To what extent do you agree with the level of ambition proposed for the Annual Mean Concentration Target (AMCT)?**

☐ Strongly agree

- ☐ Agree
- ☐ Neither agree nor disagree
- X Disagree
- ☐ Strongly disagree

**Question 1b: Please explain your answer.**

We're concerned that aim of cutting PM2.5 emissions so drastically within a relatively short period of time leaves the potential for unintended consequences. It is acknowledged that the WHO has made no consideration to whether the levels its guidelines state can be reached in any country or region, or how levels could be achieved and at what cost.

We are particularly concerned that those unintended consequences could be felt most strongly by those organisations and businesses that are contributing minimal amounts to overall PM2.5 emissions. The heritage rail sector is one of those. Heritage rail is a low-volume and responsible user of coal that delivers huge economic, cultural and social benefits while securing a globally important heritage.

Damaging that cultural heritage would have major implications for communities across the UK. But in Wales, the nation that gave birth to heritage rail and which has the greatest concentration of heritage railways in the UK, that damage could be even greater.

The proposed AMCT targets seem to create the potential to target one specific area without being clear about what that could mean in real terms. It is also concerning that it is accepted that the AMCT targets are only plausible in the 'High' and 'Speculative' scenarios discussed. We do not believe that the Welsh visitor economy and its unique cultural heritage in respect of heritage rail should be potentially damaged in the name of speculative measures on PM2.5 emissions.

The consultation document talks of technological, behavioural and legislative changes to reach the targets. But for heritage rail there are no viable alternatives to coal right now, and for the foreseeable future.

Measures must be developed to ensure that heritage rail does not face unintended consequences of policies driven by these methodologies. It must not be mixed up with the domestic burning of coal, or worse still wood, which have a far greater impact on PM2.5 emissions.

**Question 2a: To what extent do you agree with the level of ambition proposed for the Population Exposure Reduction Target (PERT)?**

- ☐ Strongly agree
- ☐ Agree
- ☐ Neither agree nor disagree
- X Disagree
- ☐ Strongly disagree Question

**2b: Please explain your answer.**

We have similar concerns about the PERT methodology being proposed – but note that it is being suggested that action could be taken even if measurements using PERT find that PM2.5 levels are below the threshold referenced by the WHO. We are worried that this appears to give almost unlimited ability for project creep.

This gives concern that the potential for unintended consequences is even greater still with the PERT methodology. We are again concerned that those unintended consequences could be felt most strongly by those organisations and businesses that are contributing minimal amounts to overall PM2.5 emissions. The heritage rail sector is one of those. Heritage rail is a low-volume and responsible user of coal that delivers huge economic, cultural and social benefits while securing a globally important heritage.

Damaging that cultural heritage would have major implications for communities across the UK. But in Wales, the nation that gave birth to heritage rail and which has the greatest concentration of heritage railways in the UK, that damage could be even greater.

We must reiterate that for heritage rail there are no viable alternatives to coal right now, and for the foreseeable future.

Measures must be developed to ensure that heritage rail does not face unintended consequences of policies driven by these methodologies. It must not be mixed up with the domestic burning of coal, or worse still wood, which have a far greater impact on PM2.5 emissions.

**Question 3a: To what extent do you agree with the proposed arrangements for assessing PM2.5 levels and achievement of the targets?**

☐ Strongly agree

☐ Agree

☐ Neither agree nor disagree

☒ Disagree

☐ Strongly disagree

**Question 3b: Please explain your answer.**

We have concerns that the assessment arrangement proposed have fundamental flaws. Under the AMCT methodology no averaging is proposed, while under PERT only a three-year average is proposed. We fear that this could lead to knee-jerk reactions, further increasing the risk of unintended consequences to the heritage rail sector.

**Question 4a: To what extent do you agree with the provision in the draft regulations to allow the subtraction of the 'natural contribution' to particulate matter where exceedances of a target are due in whole or in part to these natural contributions?**

☐ Strongly agree

☐ Agree

☒ Neither agree nor disagree

☐ Disagree

☐ Strongly disagree

**Question 4b: Please explain your answer.**

N/A

**Question 5: We have asked some specific questions. If you have any other relevant thoughts or comments on our proposals, please provide them here.**

While we have outlined most of our concerns above we are also concerned by the targeting of coal in the list of proposed measures. All three scenarios list a 'ban on domestic combustion of coal.'

However, only the 'Speculative' scenario lists banning domestic wood fuel – and even then only in selected areas. While we note that restricting the sale of wet wood (proposed in all scenarios) will have a substantial impact on the emissions from the domestic burning of timber – all estimates show that it is still far more prevalent than coal.

Although it appears to be clear that heritage rail would not be directly targeted by moves to ban domestic coal use, we're concerned that there could be unintended consequences in relation to the viability of the overall coal market – even for those, like heritage rail, which are responsible and low volume users of coal. Heritage rail uses coal very different to domestic coal. Steam locomotives can only burn high-quality that produces high temperatures and large amounts of energy.

To protect the future economic, cultural, educational and social benefits that heritage railways provide, the whole heritage rail sector stands united on the necessity to use coal. There are no viable alternatives for coal right now, and for the foreseeable future. As we have already seen with the shift to imported coal, limiting access to coal can clearly increase emissions – even where policies have been intended to do the opposite. Any restrictions proposed on coal must include exemptions for small-scale use such as heritage steam.

Our sector fully understands that governments across the UK want to decarbonise and ensure that there can be no return to the mass use of coal for purposes such as electricity generation ... But it is essential that legislators and policy makers understand that coal has other purposes that can be completely compatible with the wider net-zero agenda.

Responses to consultations are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please tick here: Anonymous

**Please provide a part post code, eg. CF10**

The Heritage Railway Association represents heritage rail operators throughout Wales and the other parts of the UK.

## **Further information**

Please contact *[information redacted]*

Redacted information - regulation 13 - personal data.

