



CONSULTATION RESPONSE

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Department for Transport Consultation, September 2016 Consultation on introducing roadworthiness testing for fast tractors and other technical changes to vehicle testing legislation

The Federation of British Historic Vehicle Clubs (FBHVC) represents over 500 member clubs with a total membership of a quarter of a million historic vehicle owners and enthusiasts. Interest in historic vehicles sustains economic activity worth £5.5 billion annually to the UK economy and supports the employment of nearly 35,000 people.

FBHVC, both itself and through its membership, is thus the primary national repository of knowledge and expertise on the subject of historic vehicles in general.

INTRODUCTION

FBHVC recognises that the greater amount of this Consultation deals with fast tractors which are of course too new as a class for any to have become historic vehicles. It will be some time before any of the class do.

However, FBHVC is concerned that the latter part of the Consultation is of more general effect and that by reason of its title the import of the Consultation may have been missed by potential consultees.

FBHVC has of course offered a full response to the Consultation on Exemption from Roadworthiness Testing for Vehicles of Historic Interest (hereafter 'the Historic Vehicles Consultation') issued on the same day as this Consultation.

FBHVC is concerned only with historic vehicles and therefore has decided to offer no comment on any matter by which historic vehicles will not be affected.

However, the outcome of the classification procedure into Vehicles of Historic Interest and modified historic vehicles proposed in the Historic Vehicles Consultation may cause a significant number of historic vehicles to be or continue to be subject to the general MOT test and FBHVC thus comments where appropriate.



RESPONSES TO CONSULTATION QUESTIONS

No responses are offered in respect of Questions 1, 2, 3, 4, 5, 6, 7, 8,9, 10, 11 or 12,

Q13 – Do you envisage any difficulties with the proposal to exempt from testing all vehicles with a design speed below 25 km/h (15.5 mph)? If yes, please provide details.

FBHVC cannot envisage any problems with such an exemption applying as widely as possible.

FBHVC notes with approval that this proposal would apply to all steam traction engines and road rollers whether or not the vehicles have been modified. Under these circumstance, FBHVC would propose that these vehicles be excluded from any eventual scheme such as is proposed in the Historic Vehicles Consultation to classify vehicles in general in Great Britain into Vehicles of Historic Interest (VHIs) and others. FBHVC would also propose that this approach be applied to historic transport vehicles including steam powered vehicles which are capable of speeds in excess of 25km/h but have not been included within the MOT system from the outset.

In the view of FBHVC it would be wise to consider expanding the remit of the proposed exemption based upon not exceeding 25km/h to include the very small numbers of additional vehicles in these classes which would render their participation in the VHI scheme moot.

Q14 – Do you envisage any difficulties with implementing these changes to the legislation governing vehicle testing methods? If yes, please provide details.

FBHVC notes that the proposed changes would apply to:

1. Historic vehicles which are not classified as VHIs in accordance with the Historic Vehicles Consultation
2. VHIs which submit voluntarily to MOT tests as foreseen in the Historic Vehicles Consultation. Thus any rules made, and training performed, in relation to additional items on the requirements for MOTs in Great Britain will have to be subject to the same flexibility with regard to recognition of the date of manufacture of the vehicle being tested as is currently the case in respect of the MOT generally.

It will be important that DVSA maintains the existing flexibility in MOT test procedures and takes steps to ensure the availability of MOT test sites staffed with testers able to employ the permitted flexibility over as wide a possible area of the country. FBHVC notes that the closure of the VOSA test stations has already had the effect of restricting the availability of this service in some more remote areas of Great Britain.

This Consultation appears, in contrast with the Historic Vehicle Consultation, not to include motorcycles. FBHVC is commenting on the basis that it does not, though FBHVC is unclear as to why this should be, given that the two consultations are intimately linked.

In particular, but without prejudice to the generality of the comment made above FBHVC comments upon the following new categories:

Category 6/6.2.1

It is probable that earlier standards of bodywork would not be as tightly sealed as those on modern vehicles and that as a result a certain amount of ingress of engine or exhaust fumes is to be expected.



Category 7.8

Earlier vehicles may not be, or be required to be, fitted with a speedometer. Speedometers were not required to be fitted until 1937. Absence of a speedometer where it is not required to be fitted cannot be a failure category. In vehicles where a speedometer is not legally required but is fitted, it ought not to be a requirement for that speedometer to be tested. Earlier speedometers, even where fitted, cannot by reason of their age be expected to perform with the same level of accuracy as current speedometers. A level of latitude therefore needs to be incorporated.

If this latitude were not clearly available, FBHVC notes that knowledge by a vehicle keeper that the speedometer on his vehicle did not meet with modern standards of accuracy might thereby prejudice him from exercising any future right to undertake the voluntary MOT test, as many of FBHVC's members wish to continue to do, particularly in respect of pre-1960 vehicles.

Q15 – Do you consider that existing legislative provision is sufficient to tackle the issue of 'clocking'? If not, please give your reasons.

FBHVC is unqualified to express an opinion on the sufficiency of current legislation.

FBHVC does however point out that:

1. Many early vehicles have no odometer;
2. Early odometers may lack the accuracy of current odometers and;
3. The process of restoration or reconstruction, repair and maintenance of a historic vehicle, whether or not a VHI as foreseen in the Historic Vehicles Consultation, may necessarily involve the replacement of the entire odometer/speedometer unit, with a different unit whether new or reconditioned.

Any change to legislation would have to take account of these facts.

Bob Owen, Director, Legislation
Federation of British Historic Vehicle Clubs