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Federation of British Historic Vehicle Clubs (FBHVC)

Response to Consultation on Greater Manchester Clean Air Plan

Submitted 2 December 2020

INTRODUCTION

Greater Manchester Clean Air Proposals

Consultation Response

The Federation of British Historic Vehicle Clubs ("The Federation") submits this response to the Consultation document on the Greater Manchester Clean Air Plan. This response is submitted by e-mail as prescribed in the Consultation Document.

The Federation references the previous response submitted to the 2019 "Conversation" on emergent proposals on the formation of a Greater Manchester Clean Air Zone.¹

General

Clean Air Greater Manchester (CAGM) will be aware from the Federation's previous response that it is a national organisation with member clubs across Great Britain. It may be worth rehearsing that the Federation represents over 540 member clubs in Great Britain with a total membership of over a quarter of a million historic vehicle owners and enthusiasts. Vehicles owned by members of the Federation include historic vehicles of many kinds; cars, motorcycles, buses, coaches, lorries, vans, utility vehicles, military vehicles, tractors and other agricultural vehicles and steam engines. Historic vehicles are recognised as representing an integral part of British cultural heritage. Historic vehicles do not form a part of the contemporary transportation structure of the nation. The primary purpose of their journey is seldom the transportation of either goods or people from one point to another but is rather the movement of the vehicle itself. Such use is largely an incidental part of their preservation, enjoyment and presentation to the public and to those having an interest in mobile heritage. Federation members restore and preserve these vehicles for their historic interest, exhibit them at exhibitions, shows, community fetes, etc. and currently use the country's highways both in order to attend at those events, but also to participate in touring events and for general leisure purposes.

¹ Federation Response dated 27/06/2019

This interest in historic vehicles sustains economic activity worth £7.2 billion annually to the British economy and supports the employment of nearly 35,000 people (including in Greater Manchester and the wider North West).

Historic vehicles in total are estimated to cover only 0.21% of total vehicle mileage in Great Britain, and most historic vehicles rarely travel outside their immediate geographical base. Only a very small proportion of the total will ever need to take advantage of any exemption in Greater Manchester and the comments and concessions sought below relate to a very small number of vehicles probably less than 100 using the Greater Manchester Roads for relatively few days in a year.

Background

As stated earlier, the Federation has already commented on the Clean Air Plans and made the detailed proposals referenced earlier in this paper. The Federation does not oppose the establishment of zones or areas which enhance air quality but confines comment to any aspects which might affect the ability of historic vehicle operators to freely use their vehicles. Most of the questions in this latest consultation are understandably directed at the commercial sector (schemes for and contributions to replacing older vehicles etc) and are not relevant to the historic, heritage or preservation community. It is not considered technically feasible to retrofit historic vehicles with emissions abatement equipment and even if it were, the same would involve an unacceptable level of intrusion into the historic fabric of a vehicle. An historic vehicle is presented in 'period' condition in order that the public can see and experience vehicles of the past. This period condition typically extends to engines and other components, including in the case of many commercial vehicles throughout the 20th century engines made by L Gardner and Sons of Patricroft.

At a national level, the Federation is leading initiatives around the carbon footprint of our movement and has recently appointed an Environmental Director to lead on issues such as offsetting.

The Federation notes and welcomes the inclusion in Table 2 (*Permanent Exemptions to CAZ Charges*) of vehicles in the historic tax class in line with the Government's Clean Air Zone Framework published in May 2017. This ensures that vehicles over 40 years old will be exempt from the charge.

This response will therefore confine comments to:

- a. Responding to Questions 3a and 4 concerning the charging regime, and
- b. Raising once more the issue of historic vehicles over 30 years old (but less than 40) addressed in the Federation's earlier response and which have not been included in the exemption or discount schedules in this latest consultation. This issue remains a problem for members of the historic vehicles community based in and around Greater Manchester.
- c. Addressing disability access to historic vehicles and participation at heritage events

Outstanding Issues summary

CAGM will recall from its previous response that the Federation noted that the international measure of a historic vehicle, recognised by both FIVA and UNESCO, is that the vehicle must be at least **thirty** (not forty) years old a standard that Scotland has adopted for its proposed Clean Air Regulations under the Transport (Scotland) Act 2019. The Federation also noted that the "working lives" of heavier commercial vehicles such as buses, coaches and heavy goods vehicles are normally shorter than is the case with cars and motor cycles and accordingly are withdrawn from use or put into preservation much younger.

The Federation noted that this preservation task will be made more challenging if these heavier vehicles not yet in the historic tax class are subject to the full daily rate charge. As indicated in the earlier response, the industrial and former industrial areas in Greater Manchester are attractive storage sites for such large vehicles and although small in number demonstrated by the figures provided in that response, there will be within and around the boundaries of Greater Manchester a number of such historic vehicles.

It follows that particularly in the case of such HGVs, buses and coaches, historic by International standards and on the cusp of becoming historic in terms of UK VED, the practical effect of paying the fully daily charge would be to prevent the possibility of keeping, restoring, maintaining or using a historic vehicle in those categories anywhere within Greater Manchester. The Federation had therefore proposed previously that since they were no longer in commercial service, in preservation and conforming to the international measure of historic, these “younger vehicles” should enjoy similar exemption from the daily charge.

Noting that this category of 30 plus years has not been included in Table 2 of the latest consultation, the Federation now requests consideration be given to their inclusion in the list of those vehicles entitled to local discounts in Table 5 or alternatively it is confirmed that they come within the existing category of PHGVs in Table 5.

In addition, the Federation proposes an additional small category of historic buses less than 30 years old but greater than 20 years old in order to make appropriate provision for disabled and senior citizens whose access to and participation in historic vehicle events would otherwise be constrained.

RESPONSE

Q3a: Do you have any comments on the proposed charges?

A Yes

Q4: To what extent do you agree or disagree with the permanent local exemptions proposed by Greater Manchester?

A See below in respect of :

- a. Historic vehicles older than 30 years.
- b. Buses not in commercial service but less than 30 years old in heritage use with disabled access.

Historic Vehicles older than 30 years

Since the Federation's previous proposals that historic vehicles older than 30 years (but not yet 40) should enjoy similar exemption from the daily charge was not previously accepted, the Federation requests that they at the very least enjoy a reduced rate. It notes in Table 5, the category relating to *Permanent local discounts proposed by Greater Manchester* that privately owned HGVs would enjoy a **discounted rate** (subject to certain registration requirements). This category is directed at motorhomes and horse boxes presumably because their small numbers, limited use, social benefit and the disproportionate effect of the £60 charge, justifies a discount.

Similar conditions pertain to the small numbers of "younger" historic heavy vehicles referred to earlier. In addition they are in preservation and conform to the international measure of historic vehicles. The Federation would request a similar discount for them and proposes the following:

- i. That Table 5 is amended to include the following:

"Buses, coaches and vehicles >3.5t over thirty years old, not involved in a commercial activity and in "heritage" use", or

- ii. It is clarified in the final charging document that the vehicles described in para i. above will be regarded as PHGVs for the purposes of the discounted rate.

Disabled Access Buses

The Federation considers it important from an equality and diversity perspective that the less able and senior can participate in historic vehicle and specifically historic bus events. The design and construction of historic buses more than 30 years old makes access for them difficult and sometime impossible for certain people. Not until the mid 1990s were buses with a low floor and a wheelchair ramp introduced to the UK (including Greater Manchester) for the first time. Some of these early low floor buses (dating approx. 1994 to 2001) have been withdrawn from commercial service and have entered the world of preservation.

This has meant that when historic bus events have been organised for the general public, those in wheelchairs have been able to enjoy a ride on a bus of yesteryear (albeit the fairly recent past) sometimes for the first time. Payment of the full daily charge by these bus owners would increase the level of the already challenging costs of preserving and running these buses and might result in their being withdrawn from use. It would be a matter of profound regret and contrary to broader equality and diversity aims if the historic bus community in the GM area had to go back to the days of catering for able-bodied persons only.

The Federation asks that consideration be given to the scheme proposed by The City of Leeds in its CAZ to deal with such vehicles. This would require them to register and upon successful application, to allow them access the city for a limited number of days per year. The Federation would request either an exemption from the daily charge as for vehicles in the historic tax class or a similar discount for them as for over 30 year old buses and proposes the following:

i. That Table 2 is amended to include:

"buses and coaches less than thirty years but more than 20 years old not involved in a commercial activity, in "heritage" use, with a wheelchair ramp/access and registered with the Authority for X days per year", or

ii That Table 5 is amended to include:

“buses and coaches less than thirty years but more than 20 years old not involved in a commercial activity, in “heritage” use, with a wheelchair ramp/access and registered with the Authority for X days per year,” or

iii. In default of acceptance of the proposals in paras i. and ii. above, it is clarified in the final charging document that the vehicles described in those paras above will be regarded as PHGVs for the purposes of the discounted rate.

Conclusion

The Federation stands ready to engage in further discussions with representatives of Clean Air Greater Manchester on any or all of the points raised in this submission.