



Greater Manchester Clean Air Proposals Consultation Response

The Federation of British Historic Vehicle Clubs (“The Federation”) submits this response to Clean Air Greater Manchester which the Federation understands to represent the Local Authorities of Greater Manchester in relation to the Proposals. This response is submitted by e-mail as prescribed in the Consultation Document.

General

The Federation is a national organisation with member clubs across Great Britain.

- 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.
- This interest in historic vehicles sustains economic activity worth £5.5 billion annually to the British economy and supports the employment of nearly 35,000 people.
- Based upon data established by the Federation in its 2016 National Historic Vehicle Survey, the Federation calculates that there are approximately 540,000 historic vehicles located across the entire area of Great Britain.
- The Federation is the organisation which represents the UK in FIVA, the international federation for historic vehicles, which has recently become an approved partner of UNESCO, recognising the significant contribution of vehicles, which to date have been overwhelmingly powered by internal combustion engines,



to the culture and social history of the World. The cultural importance of this form of motive power for the past century and more might be thought to increase as its probable end comes into view.

While the Federation regards the exemption of historic vehicles as in principle to be encouraged, as there is no public interest in encouraging the scrapping of cultural artefacts, the numbers which could possibly need to take advantage of exemptions to the Proposals of Clean in Greater Manchester are small. 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, so only a very small proportion of the total will ever wish to take advantage of any exemption in Greater Manchester.

Consultation Matters Commented Upon

In the view of the Federation, as a national body, most of the questions in the online survey relate either to business activities or to personal behaviours and opinions upon which it is not the place of the Federation to offer its view.

The Federation has chosen instead to comment upon only that part of the proposals in respect of which the Federation has a pertinent opinion to offer. The Federation trusts this approach will be acceptable to Clean Air Greater Manchester.

Relevance to the Federation

The Federation observes that the proposals for a single zone, within which a daily penalty fee movement is intended to be levied, reflects the approach of the Greater London LEZ, in that it includes both areas of high pollution and significant other areas where such pollution is not uniformly present at a high level.

These matters were not well understood when the Greater London LEZ was introduced but in that LEZ a single cut-off date of 1973 was chosen for exemption for historic vehicles, which is currently in force. Latterly that was amended to refer to the "historic" taxation class. While it is not the place of the Federation to have a view on this approach, it does raise issues which we think proper to bring to your attention.

The Federation takes note of the categories of vehicle which will, under the proposals, be liable to pay a daily penalty. There will be within and around the boundaries of Greater Manchester a small number of historic vehicles in each of the heavy goods, light goods, bus and coach categories and indeed the minibus, motorhome and horsebox categories.

Using published DVLA data the closest area in respect of which figures readily can be established is the whole of the North West of England. The numbers of vehicles which were built thirty or more years ago (and thus meet the UNESCO definition of historic) are approximately as follows

- Heavy Goods Vehicles 400, of which around 300 are eligible for the "historic" taxation class, meaning only 100 additional vehicles would be exempted if the Federation proposal were accepted.



- Buses and coaches 400, of which around 300 are eligible for the “historic” taxation class, meaning only 100 additional vehicles would be exempted if the Federation proposal were accepted.
- Light goods vehicles of all types, 6000, of which around 4000 are eligible for the “historic” taxation class, meaning only 2000 additional vehicles would be exempted if the Federation proposal were accepted.

Even including the somewhat higher number of light goods vehicles that number, would be insignificant in terms of overall pollution.

There are no readily available statistics known to the Federation which would disclose the number of these historic vehicles based or in or near to Greater Manchester, but given that the North West includes other significant urban areas, the vehicles in these categories either based in or wishing to wish to enter the proposed Zone will in total be small.

The Federation also notes that the area of Greater Manchester includes significant industrial and former industrial areas which are suitable for preservation activities of the larger of these vehicles.

Further the Federation points out that, especially in the categories of buses, coaches and heavy goods vehicles, they have ceased to be in daily use for the purpose for which they were constructed. Indeed in the case of buses and coaches they are normally no longer legally permitted to be so used. Thus the small percentage which are put into preservation start out younger than is the case with cars and motorcycles.

The practical effect of the daily penalty on owners of preserving vehicles in each of the intended classes

- (a) would add unacceptably to the cost of keeping, restoring, maintaining or using a historic vehicle in those categories anywhere within Greater Manchester, unless it were to be exempt and
- (b) might well have an adverse effect on a number of SMEs working on maintenance, repair and restoration of historic vehicles in the area.

Federation Proposals

The Federation notes that the consultation document recognises that Section 3.9.1, para 146 of the Government’s Clean Air Zone Framework, published in May 2017, expects vehicles with a 'historic' vehicle tax class to be exempted from the penalty charge. This in effect means that vehicles over forty years old could be exempted.

The Federation would point out 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.



The Federation therefore proposes that in addition to the exemption for “historic “ class UK registered vehicles, in view of the very small number of vehicles likely to benefit from the exemption, the following be exempted from the daily penalty

- In view of the small number of vehicles affected, vehicles over thirty years old and not involved in a commercial activity
- Buses and coaches in “heritage” use , and
- in recognition of the fact that, at least in Europe, an informal principle of reciprocity is evolving, any vehicle registered in another country than the United Kingdom which is more than thirty years old.

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 response.