



Federation of British Historic Vehicle Clubs Ltd
PO Box 295
Upminster
Essex
RM14 9DG

14th April 2020

Dear Sirs

Call for Evidence – VED changes consultation 2020

I refer to the above call for evidence.

The Federation of British Historic Vehicle Clubs [FBHVC] wishes to respond to your consultation on behalf of our member clubs. Please find our response to your proposal appended.

The Federation of British Historic Vehicle Clubs [FBHVC]

The Federation of British Historic Vehicle Clubs (the Federation) 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.

Vehicles owned by Federation members include historic vehicles of many kinds, including cars, motorcycles, buses, coaches, lorries, vans, utility vehicles, military vehicles, tractors and other agricultural vehicles and steam engines. These vehicles range in age from thirty years old (the internationally accepted definition of historic vehicles as used by UNESCO) to vehicles built during Queen Victoria's reign. Our 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.

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

The members of the Federation affiliated clubs possess a greater number and more extensive variety of historic vehicles, particularly those dating from before the Second World War, than in any other EU Member State. This reflects the different historical experiences of the UK, especially the absence of land war on its territory. 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.

We trust our response is clear and comprehensive but are ready to provide further details and supporting information on request, if required.

Yours Sincerely,

D R Daniel
Legislation Manager, FBHVC

VED Questions

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| 1 | Why are first licence VED rates currently failing to discourage many car buyers from making higher emitting choices? | New vehicles are not within the remit of the Federation and we have no view on this matter. |
| 2 | What are your views on higher first licence VED rates for more polluting vehicles? | New vehicles are not within the remit of the Federation so we have no view on this matter. |
| 3 | How would this impact the vehicles that manufacturers sell in the UK? | The Federation has no knowledge on this matter. |
| 4 | What are your views on the potential ways of enhancing the impact of first licence VED outlined above? | New vehicles are not within the remit of the Federation and we have no view on this matter. |
| 5 | For new vehicles, do you think that government should base ongoing VED liabilities on carbon emissions, rather than just at first registration? | New vehicles are not within the remit of the Federation and we have no view on this matter. |
| 6 | Do you think the government should reform VED rates for vehicles registered from 1 April 2017 so their liabilities reflect their carbon emissions? | <p>Vehicles which are not yet historic are not within the remit of the Federation and consequently view is offered on the specific date. The Federation is however concerned about the effect on vehicles, including motorcycles, built before 2000.</p> <p>The Federation would be concerned if the default flat rate were to be significantly increased in respect of vehicles built before 2017, particularly in respect of vehicles built before 2000.</p> <p>It is the view of the Federation that a significant proportion of all these pre-2000 vehicles, and the much smaller number of vehicles built before 1990 (which currently fall within the internationally recognised definition of a historic vehicle as propounded by the Fédération Internationale des Véhicules Anciens (FIVA)) which are still be in use, whether or not on a daily basis, are used primarily as a function of the intent of their owners to preserve these vehicles.</p> <p>For such owners, the VED rate will not be a factor in their retention of such an older vehicle.</p> <p>The Federation also assumes that no revision of the VED regime would put in question the existing rolling 40 year exemption for historic vehicles. Historic vehicles, on account both of their small numbers and their limited use on the roads, cannot constitute a significant effect on emissions in the UK.</p> |
| 7 | Are you aware of any unintentional perverse environmental incentives that have developed over time relating to VED on | The Federation has no knowledge on this matter. |

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| | vehicles first registered prior to April 2017? Do you think government should take any action relating to this? | |
| 8 | Do you think motorcycles should be taxed based on carbon emissions? | <p>The Federation is unaware of the details of motorcycle data and its applicability to a granular approach to rates of VED. The Federation would expect the organisations with a particular remit to represent the interests of motorcyclists to be better able to address this question, however The Federation has noted in recent Clean Air Zone proposals that the Government has not chosen to include motorcycles as a result of their limited contribution to overall emission levels.</p> <p>The Federation would also counsel that any proposed changes take account of the staged requirement for cubic capacity for motorcycle driving licences. It would possibly be unjust to impose an increased level of VED on motorcycles whose use is not optional, particularly to younger motorcyclists.</p> <p>Subject to these caveats, any comments in the answer to question 6 would apply to motorcycles if they are to be included in a revised VED regime.</p> |
| 9 | What impact would this have on the behaviour of those looking to purchase a new motorcycle? | <p>See the answer to Question 8 with respect to staged driving licence requirements.</p> <p>In our view, motorcycle ownership and use seems to be more closely aligned to social and leisure use rather than functional daily travel. As such, any raised level of VED is less likely to influence a purchase.</p> |
| 10 | Should the government continue to take account of NOx emissions if it reforms the VED system? | The Federation trusts that any reform will take account of the Federation's answers to Question 6. |
| 11 | Is the signal to purchase RDE2 compliant diesel cars strong enough? | New vehicles are not within the remit of the Federation and we have no view on this matter. |