



Historic Rally Association P.O.Box 631 Camberwell, Victoria 3124

www.hra.org.au

To: Club Permit Scheme Consultation
Registration & Licensing Practice and Standards
VicRoads
60 Denmark Street
KEW VIC 3101

Email: CPSconsult@roads.vic.gov.au

Att: Mr Mario Cattapan.
Manager Business Practice Development Registration and Licensing.

Re: Proposed amendments to Victoria's Club Permit Scheme.

Dear Mario,

The committee and membership of the Historic Rally Association Incorporated, (HRA), thanks you for the opportunity, for all CPS clubs to provide some feedback on the proposed changes to the CPS.

The HRA currently has approximately 800 members. We are affiliated with the 'Confederation of Australian Motorsport' (CAMS) and are very probably the largest Rallysport oriented Car Club in Victoria. Since our beginnings as a club over 22 years ago, the HRA has quite probably organised and conducted more Rally events per year than any other club in Victoria. This includes of course the iconic Alpine Rally, Australia's longest running motorsport event and one of the oldest motorsport events in the world, which in recent years has had entry numbers of over 100 or more Rally prepared vehicles from all over Australia.

The HRA membership currently has approximately 300 vehicles in the Club Permit Scheme. While there are a few older ones, it is fair to say that the majority of our vehicles fall into the post 1968 bracket and as such under the proposed introduction of VSI-33 would be essentially subject to VSI-8/VS-14. Some of our vehicles are essentially standard cars with very limited or no modification outside VSI-8/VS-14 and would therefore have no difficulty conforming with the proposed changes. However, as is implied by the name of our club, many of our vehicles have been competition prepared or modified to CAMS requirements to the extent that they no longer conform to ADR and cannot hope to pass a RWC examination. It is in this area where our greatest concern lies.

Fortunately a possible alternative does exist for these rally prepared vehicles, the Rally Plate (RP) scheme. Unfortunately, as it currently stands there are several barriers or disincentives for the owners of these rally prepared vehicles to migrate their cars across to the RP scheme, in no particular order;

1. The cost. The CPS at present costs either \$71.20 for 45 days or \$139.70 for 90 days. By contrast the RP scheme currently costs \$407.90 for the first year, less the \$34.00 number plate charge in subsequent years. Very few owners are likely to use a rally prepared vehicle for more than 45 days in a year, so the RP is currently well over five times the cost of the CPS. The HRA would like to see the cost of a Rally Permit be on a par with the CPS.

2. Usage limitations. From the Vicroads website "Club Permit vehicles can be used at any time for any purpose other than for the carriage of goods or passengers for hire or reward. Permit holders are not restricted to club sanctioned activities when using their vehicles."

By contrast (also from the Vicroads website), "A rally permit is a 12 month unregistered vehicle permit (UVP) which permits the use of a vehicle for the following purposes:

- during approved rallies conducted by a club affiliated with a national motorsport organisation approved by VicRoads
- associated transport stages of an approved rally
- travelling to or from an approved rally
- in testing the vehicle for an approved rally (letter from CAMS permitting test is required)
- for reasonable travel to and from a place of repair and for reasonable testing to confirm repair."

The sticking point for many of our members and indeed the members of other clubs who own and maintain similarly rally prepared vehicles, is that there are many more legitimate CAMS sanctioned activities to which our members wish to be able to drive their cars other than only an "approved rally". Such as for example (but not limited to) Motorkhana or Autocross events and displays such as at the 'Australian F1 Grand Prix', 'Motorclassica', etc. The HRA requests that the condition of use for the Rally Permit needs at a minimum to be revised to allow travel to and during "approved motor sport events" and preferably to also allow limited use for other purposes such as club meetings or displays.

3. The need to hold a high level CAMS National Rally Licence (or an international licence). This requirement currently precludes many novice competitors or those with lower aspirations or financial means from obtaining a rally permit. We propose that by lowering the requirement to simply the holding of a CAMS licence, many more of our members (and others) will be only too happy to migrate across to the RP scheme.

4. The CAMS logbook only records inspection history, it does not record usage history. The HRA has no problem with the requirement for use of a CPS style logbook for vehicles on the RP scheme.

Turning to the proposed changes to the CPS outlined in your letter dated 26/8/14, the HRA wishes to draw your attention to the much more rigorous inspection regime that was put into place earlier this year by and for our club. The full outline of the procedures that the HRA has put into place can be found on our web site www.hra.org.au (look for the CPS link down the left side pane). Essentially however, we have instigated a requirement for all of our CPS vehicles to be inspected on both initial application and then on an annual basis by our nominated inspector/signatories. As CAMS 'licenced rally scrutineers' and auto mechanics of many years experience, the HRA's inspectors will not pass anything that is unsafe for use on the public road. We have also already put into place a record keeping system that keeps photos on file.

Given the systems that that HRA has initiated, we have reservations against the proposed requirement for all prospective new applicants to go to the unnecessary expense and potential difficulty of getting a RWC and/or possibly also a VASS inspection performed. We understand that there are clearly some vehicles that have been wrongly admitted to the CPS by other clubs however in our case, the system of certification by the club has worked well and we see no reason to tar everyone with the same brush.

The HRA is more than well aware of the exponential increase since Feb 2011, in applications for admittance to the CPS and it is clear that there has been a large number of 'new' clubs that have been formed expressly to gain access to the CPS. What is also clear is that many of the 'new' clubs are taking advantage of the CPS to the detriment of older established clubs. The HRA proposes that the need for a RWC for admittance to the CPS should only be imposed on clubs that formed or were admitted to the CPS since Feb' 2011. Older established clubs such as the HRA have always tried to impress upon its membership the need to respect the CPS and treat it as a privilege. It would seem that the privilege has indeed been abused but we do not believe that all clubs should be made to endure the proposed changes. We welcome an audit of our record keeping system and our inspection regime.

We question the need for the introduction of the new 'M' plate. A car is either standard or it is not. The proposed changes to the CPS and introduction of the new VSI-33 allowing some modifications to cars in the pre 1949 and post 1948 to 1969 age groups implies that nearly every vehicle currently on 'H' plates should conceivably be migrated across to the new 'M' plate because it is extremely unlikely that even the best concours prepared vehicle will be in absolutely the same condition that it left the factory.

As you also mention in your letter, "Vicroads was approached by a number of stakeholders & clubs". We presume that one of those stakeholders was the Association of Motoring Clubs (AOMC). The HRA is affiliated with the AOMC but we think it important to point out that while the committee of the AOMC may purport to represent "over 200 member clubs and represents some 45,000 vehicle enthusiasts in Victoria", they cannot possibly represent a widely divergent range of views of all of those members as one voice. As with all organisations, the members of the AOMC committee have their own particular views & agenda on the CPS. As I am sure you will soon see when you receive feedback from individual clubs such as ours the range of opinions will differ somewhat from the views of the AOMC.

On behalf of the Historic Rally Association,

Yours sincerely,



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9 October 2014

CC: secretary@aomc.asn.au