

## Response ID ANON-FZBA-EFKM-6

Submitted to **Clean Air Zone Consultation - Businesses and Organisations**  
Submitted on **2019-08-23 11:15:38**

### About You

#### 1 What is the name of your business or organisation?

**Organisation:**

Federation of British Historic Vehicle Clubs

#### 2 What is your name?

**Name::**

Emma Balaam

#### 3 What is your job title/role in the organisation?

**Title/Role::**

Company Secretary

#### 4 What is your email address?

**Email::**

secretary@fbhvc.co.uk

#### 5 May we contact you further about this consultation and the Clean Air Zone for Sheffield?

Yes

#### 6 What sector does your organisation fall into?

Arts, entertainment, recreation and other services

#### 7 What is the postcode of your organisation's main site?

**Organisation postcode:**

RM14 9DG

#### 8 How many employees does your organisation have in Sheffield?

0 to 9

### About the Clean Air Zone

#### 9 Do you agree or disagree that the proposed Clean Air Zone covers the right area?

Neither Agree nor Disagree

#### 10 Do you have any comments on the proposed area of the Clean Air Zone?

**CAZ Area comments:**

The Federation has no comment to make

#### 11 How many sites does your organisation have:

**Q11 Number of sites - In the proposed CAZ area:**

0

**Q11 Number of sites - In Sheffield but outside the CAZ area:**

0

**Q11 Number of sites - Outside Sheffield:**

1

#### 12 Roughly how many vehicle trips per week are made in the proposed CAZ area as part of your organisation's operation?

**Q12 No.of vehicle trips - I receive deliveries/collections to my organisation within the proposed CAZ:**

Don't know

**Q12 No.of vehicle trips - I supply goods and services to customers or service users in the proposed CAZ:**

Don't know

**Q12 No.of vehicle trips - I transport people or goods in or through the proposed CAZ (e.g. courier, haulier, taxi, bus, firm, ambulance):**

Don't know

### **Clean Air Zone Restrictions**

**13 Which types of vehicle do you think should be included in the Clean Air Zone restrictions?**

**Q13 Which vehicles should be charged? - Buses and coaches:**

Don't know

**Q13 Which vehicles should be charged? - Lorries (HGVs):**

Don't know

**Q13 Which vehicles should be charged? - Taxis and private hire vehicles:**

Don't know

**Q13 Which vehicles should be charged? - Vans (LGVs) and minibuses:**

Don't know

**Q13 Which vehicles should be charged? - Cars:**

Don't know

**Q13 Which vehicles should be charged? - Motorcycles and mopeds:**

Don't know

### **Your organisation's vehicles**

**14 Does your organisation use vehicles in Sheffield?**

Our organisation does not use any vehicles

### **The proposed daily charge for non-compliant vehicles**

**18 What do you think about the proposed level of charge for different non-compliant vehicles?**

**Q18 Proposed level of charge - Buses and Coaches:**

Don't know

**Q18 Proposed level of charge - Lorries (HGVs):**

Don't know

**Q18 Proposed level of charge - Hackney Taxis:**

Don't know

**Q18 Proposed level of charge - Private Hire Vehicles:**

Don't know

**Q18 Proposed level of charge - Vans (LGVs) and minibuses:**

Don't know

### **Vehicles that will not be charged**

**19 Do you agree or disagree that the following vehicles or circumstances should be exempted at this stage?**

**Q19 Agree/Disagree with exemptions - Showmen's guild vehicles (e.g. fairground and fun fair vehicles):**

Agree

**Q19 Agree/Disagree with exemptions - Vintage buses (non-commercial):**

Agree

**Q19 Agree/Disagree with exemptions - School buses:**

Agree

**Q19 Agree/Disagree with exemptions - Where there is no compliant vehicle available on the market:**

Don't know

**Q19 Agree/Disagree with exemptions - Vehicles entering the Clean Air Zone due to diversions on the road network:**

Agree

**20 Do you have any other comments about the proposed level of Clean Air Zone charge in Sheffield?**

comments about the proposed level of Clean Air Zone charge in Sheffield:

No

### **How the Clean Air Zone affects your organisation or business**

**21 If a Clean Air Zone was introduced what do you think would be the overall impact for the following? Please tick one option per row.**

**Q21 CAZ impact - Your organisation/business:**

Negative

**Q21 CAZ impact - The health of people in Sheffield:**

Don't know/no opinion

**Q21 CAZ impact - Businesses in Sheffield:**

Don't know/no opinion

**Q21 CAZ impact - Sheffield as a city:**

Don't know/no opinion

**22 If the proposed Clean Air Zone was introduced, how do you think it might affect your organisation/business?**

You might want to think about any possible impacts on your employees, customers or suppliers.:

See the answer to Question 19

**23 If the proposed charges are introduced, how are you likely to respond? Please choose up to three answers, where '1' is most likely response, '2' is second most likely, etc.**

**Q23 CAZ likely responses - Just pay the daily charge:**

3

**Q23 CAZ likely responses - Look to replace non-compliant vehicle(s) with a compliant one(s):**

**Q23 CAZ likely responses - Relocate the business to outside the CAZ:**

**Q23 CAZ likely responses - Relocate the supply chain to outside the CAZ:**

**Q23 CAZ likely responses - Increase prices to cover the charge:**

**Q23 CAZ likely responses - Reduce the number of journeys in the CAZ:**

2

**Q23 CAZ likely responses - Divert journeys around the CAZ:**

1

**Q23 CAZ likely responses - Cease trading:**

**24 If you were to upgrade your business vehicle(s) from non-compliant to compliant one(s), how are you most likely to finance this?**

Other (please state)

**Other upgrade finance:**

Not relevant. The Federation has no vehicles. Possibly affected vehicles belong to members of our member clubs.

### **Support for organisations and individuals**

**25 To what extent do you agree or disagree that there should be extra support for the following people or organisations? Please tick one option per row.**

**Q25 Agree/Disagree with extra support package - Small and medium sized enterprises operating in the CAZ area:**

Don't know/no opinion

**Q25 Agree/Disagree with extra support package - Larger businesses and organisations operating in the CAZ area:**

Don't know/no opinion

**Q25 Agree/Disagree with extra support package - Businesses and organisations outside the CAZ area:**

Don't know/no opinion

**Q25 Agree/Disagree with extra support package - Taxi operators:**

Don't know/no opinion

**Q25 Agree/Disagree with extra support package - People living in or close to the CAZ area:**

Don't know/no opinion

**Q25 Agree/Disagree with extra support package - People with limited income:**

Don't know/no opinion

**Q25 Agree/Disagree with extra support package - Disabled people:**

Don't know/no opinion

**26 Do you have any additional comments on the type of support which could be provided, and who it should be for?**

**Q18 comments support/who for:**

No comments

**27 If a Clean Air Zone was introduced do you think your organisation would need extra support?**

No

**28 If you answered 'yes' to the previous question, what kind of support do you think you would need and why?**

**Q20 what kind of support:**

**29 To what extent would the proposed support packages help you to upgrade to a cleaner vehicle that would not be subject to the charge?**

**Q29 Would support packages encourage upgrade - Grant towards upgrade to electric vans (LGVs) (eg. plug-in van grant):**

Not relevant

**Q29 Would support packages encourage upgrade - Loan towards upgrade to compliant Euro 6 van:**

Not relevant

**Q29 Would support packages encourage upgrade - Loan towards upgrade to compliant electric van:**

Not relevant

**Q29 Would support packages encourage upgrade - Loan towards upgrade to gas or biomethane HGVs:**

Not relevant

**Q29 Would support packages encourage upgrade - Vouchers for free electric vehicle charging:**

Not relevant

**30 Would you be interested in taking up the offer of a fleet review service?**

No

**Air that is safe to breathe for all in Sheffield**

**31 What other actions do you think Sheffield City Council should take to improve air quality in the city?**

Other (please state)

**Actions to improve air quality (other):**

The Federation does not consider it is qualified to answer the questions posed.

**32 If the Clean Air Zone does not improve air quality enough to meet legal limits, we may have to introduce charging for private cars. To what extent would you support such a move?**

Not Answered

**About this consultation**

**33 Do you feel that the information provided has enabled you to make an informed comment on the proposals?**

Yes

**34 What additional information would have helped you to comment on the proposals?**

**What additional information would have helped you to comment on the proposals?:**

Sufficient information was largely provided.

The Federation however wishes to use this space to advise Sheffield City Council of additional information regarding its answers.

#### Additional information regarding Question 1

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.
- 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.

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. 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 Sheffield.

#### Additional information regarding Question 11

As a membership organisation the only site of the Federation is of a wholly administrative nature.

#### Additional information regarding Questions 12

As a membership organisation the question is irrelevant to the Federation

#### Additional information regarding Question 13

The Federation does not consider it should offer an opinion on this matter

#### Additional information regarding Question 14

The Federation is a membership organisation for a number of clubs.

Use by individual members of Federation clubs when using historic vehicles is unknown

#### Additional information regarding Question 18

The Federation does not consider it should offer an opinion on this matter

#### Additional information regarding Question 19

It is noted that the Sheffield City Council has chosen to adopt the phrase "Vintage Buses", which is the same as that used by Leeds City Council, to define a proposed exemption.

There are a small number of buses and coaches, most of which would normally be entitled to be within the "historic taxation class, which are preserved and undertake what might be seen as commercial tasks solely in order to assist in funding their continued existence as cultural assets.

Following discussion with those involved in this activity, Leeds City Council has, in its Clean Air Zone Charging Order 2018 in the Schedule to the Order entitled "Leeds Clean Air Zone Charging Scheme" defined Vintage Buses to include these vehicles. This has been formalised in the definition of "Vintage Buses" set out in Paragraph 4 of Annex 2 to the Scheme.

The Federation would seek an assurance that the term "Vintage Buses" will be defined by Sheffield City Council in the same terms as those in the Leeds Order.

Additionally, in the opinion of the Federation the exemptions granted in the various Low Emission Zones should be as common as possible to avoid inadvertent breach by its members' vehicles and that this should at a minimum be that set out in paragraph 3.8.1 of the DEFRA Draft Clean Air Framework of October 2016 in respect of historic vehicles, as has been done in the City of Leeds.

This proposal falls short in that it does not include large or small goods vehicles which are in the Historic taxation class.

It is envisaged that the exercise of the rights of these vehicles would be for easily identified specific purposes such as attendance at events of a cultural significance or for necessary preservation, maintenance or repair in any businesses within the Clean Air Zone which now or in the future may carry out such tasks , These visits would be very rare and thus could have no measurable effect on air quality within the Clear Air Zone.

Additional information on Question 32

The Federation does not believe it proper to answer this question as it assumes that if cars were included, its members' historic cars would be exempted as being in the Historic taxation class, as is the case in other LEZs/CAZs..