

## Low Emission Zone Committee Report - Consultation with Bus Operators.

### Brighton & Hove Buses and Metrobus

Please note your comments will be included in the committee report

- 1. Please comment on your progress in meeting the Euro V emission standard objective of the current Low Emission Zone.**

We are on track to fully achieve the Euro V or better standard within the current timescale for the LEZ through our own investment and joint funding bids with the council.

- 2. Please confirm the number of vehicles in your fleet and their Euro emission standard that will be operating in the Low Emission Zone by December 2018.**

Currently the Brighton & Hove fleet is 275 buses. Additionally, 12 buses operated by Metrobus enter the LEZ each day. The emission standards of the B&H fleet will, by December 2018, be as follows:

B&H ratings at December 2018

Euro 3	0
Euro 4	11
Euro 5 EEV	22
Euro5+ SCRT	70
Euro 5	77
Euro 5 hybrids	13
Euro 6	51
Euro 6 stop-start	31

Metrobus

The 5 buses per day on route 270 are Euro 6

The 7 buses per day on route 271/2/3 are Euro 4

- 3. How do you plan to achieve new Euro VI Low Emission Zone standard e.g. bus replacement/ retrofit?**

A detailed fleet plan has been developed, the details of the route allocations of new investment so far in advance are commercially sensitive, though we would be willing to discuss this plan with officers in support of the following summary.

The following schedule assumes no success in the appeal for the scheme providing 69 retrofits.

2018/19 - 24 new dual door double decks in Brighton (plus 10 single decks at Metrobus – non LEZ).

2019/20 – 15 new dual door double decks in Brighton and 9 single decks from Metrobus to replace Euro IV single decks in Brighton (plus 22 single decks for Metrobus).

2020/21 – 19 new buses – potentially 11 of them new bendies, the balance and dual door double decks for Brighton (plus 9 single deck buses for Metrobus).

2021/22 – 26 new dual door double deck buses for Brighton (plus 8 single deck buses for Metrobus).

## Appendix 2

2022/23 – 27 new dual door double deck buses for Brighton (plus 7 single deck buses for Metrobus).

2023/24 – 29 new dual door double deck buses for Brighton (plus 5 single deck buses for Metrobus).

2024/25 (pre October 2024) – 23 new dual door double deck buses for Brighton (plus 5 single deck buses for Metrobus).

The balance would be 11 bendies which would remain outside of the LEZ, assuming no opportunity to convert them sooner, and 16 Volvo double decks to be retrofitted to Euro 6 as part of, hopefully, a funded retrofit opportunity at some point during the five years.

#### **4. Please provide an estimate the investment you will require to meet the Euro VI standard?**

The estimated cost of the new vehicles in the summary is, at current prices, and ignoring declining values of vehicles for disposal due to growing obsolescence, approximately £37.5m.

#### **5. Would you object to the amendments to the Low Emission Zone, as proposed?**

No we would not object. We support the amendments as proposed, as stated below:

We absolutely endorse the raising of the standard required to Euro 6 and believe Euro 6 diesel technology in buses, far more advanced than it so far is in other vehicles, is the appropriate solution for buses in helping address short and medium-term goals ahead of moves to exhaust emissions free solutions in the longer term. Where funding opportunities make it possible to do so, we 100% share the ambition of the council to leapfrog the Euro6 stage for some buses and move straight to exhaust emissions free buses.

We consider the target date for completion to the new standard of October 2024 to be stretching and challenging, given the scale of our fleet and the size of the investment needed, though building on the heavy investment in Euro6 standards and above that we have already made, we believe this will be achievable if all goes to plan and we have one significant 'win' in a funding bid. In the interests of air quality improvement, we therefore support this ambitious timeline.

We do however consider the bendy buses and hybrids as "special cases". The hybrids were bought in 2012 with Green Bus Fund funding in good faith with an expectation of using them for their full life in the city. The bendies are essential for effectively moving large numbers of students to and from the Universities every day. Both types are "better than Euro 5" but are very non-standard. We will commit to actively working to upgrade them to Euro 6 emission levels by October 2024, including exploring new battery technology and pursuing all suitable funding opportunities. However, in the event that we are unsuccessful we wish to propose that a clause in the new LEZ specifically refers to these two non-standard bus types and allows a renegotiation of the LEZ deadline during the life of the LEZ just for these two bus types. (All other bus types should remain at October 2024.)

## Appendix 2

We support the removal of the exemption for low frequency routes in the zone as this potentially undermines the strong position the bus network is able to adopt in relation to the LEZ standards

We will continue to support the 1minute switch off policy with our drivers.

We recognise the benefits of maintaining the existing scheme boundary in achieving progress but as you are aware, we would urge that subsequently consideration be given to more ambitious boundaries to further raise standards, raising awareness over a wider geographical area, and to evolving the scheme to raise standards amongst vehicles other than buses, whether through a Clean Air Zone or other approach. We are more than willing to take the lead and play our part, but clean air for the city cannot be delivered by buses alone. We are aware that taxis for example have had their standard raised as recently as March 2018, but just to Euro 4 levels. Even more acutely, we are very conscious that no standards apply to private vehicles at all.

### **Compass Travel - response**

I am very happy with the proposed recommendation and if anything I would like to see it implemented sooner. As I think you're aware we're currently investing in Euro VI buses and our Brighton services will be 100% Euro VI compliant from September this year.

I'm slightly concerned at the implication that you would prefer operators to be investing in zero emission buses (presumably electric) – since I would argue that overall Euro VI engines are better for the environment since any emissions are minimal. With electric buses there are issues over how the electricity is generated – and also the use of heavy metals in the batteries and how these are ultimately disposed of. There is also the issue that current battery technology does not allow a bus to run all day without being recharged – and this then raises a lot more environmental issues

I think it would be helpful if the wording could be amended to reflect the fact that in the view of most industry experts the investment in Euro VI buses is the best option overall based on current technology. I think it is really important for B&H Council to highlight this investment rather than implying it is inferior to electric buses – which seems to be the current position.

## Appendix 2

### National Express – response

(National Express coaches do not currently enter the Low Emission Zone)

#### **Response on behalf of National Express Ltd (UK Coach).**

National Express, UK Coach welcomes the proposals to introduce a Low Emission Zone in Brighton and Hove as a significant opportunity to improve air quality and we recognise the urgency in delivering these improvements.

However, we strongly believe that in order to be effective, the Low Emissions Zone must be introduced alongside more explicit measures to tackle urban congestion and support modal shift to public transport. Reducing private car use in conjunction with cleaner vehicles is the only option if cities are serious about addressing air pollution and its causes.

National Express is the UK's largest provider of scheduled coach services, operating across just under 1,000 locations.

We are a commercial operator, who has continually invested in the newest and most efficient vehicles available. The average age of our fleet (over 550 vehicles) is less than 5 years old. Since summer 2014 all vehicles we have purchased have been Euro VI, in advance of the requirement to comply with Euro VI emissions standards in Low Emissions Zones/Clean Air Zones.

Many of our customers demand central city centre stops; taking passengers right to their destination and where they can access onward travel is extremely important. Therefore our ability to operate in city centres is not only critical to the success of our business, but also to the delivery of an efficient and reliable national public transport network, of which coach is an integral part.

We would wish to make the following key points:

- Coach has a part to play in low carbon, clean public transport provision and should not be seen as a mode of last resort; on a per passenger kilometre basis, a full modern 56 seat capacity coach performs better on emissions than the average private car and also uses road space much more efficiently. A full coach can take one mile of traffic off the road. It is therefore most useful to focus on the movement of people, rather than the movement of vehicles per se.
- The role of transport providers in delivering air quality targets must be properly recognised and we are pleased to see Brighton and Hove City Council engaging with bus and coach operators to understand the transport industry and the associated planning and investment required for fleet renewal and replacement to ensure achievable targets and timescales.
- We would suggest implementation in 2024 would provide operators with sufficient time to plan and become compliant. However, it must be recognised that the opportunity to move to zero emission coaches is not currently a realistic proposition, as the technology is not sufficiently developed and market-ready for long-distance vehicles.
- If it is to deliver significant air quality improvements the Low Emission Zone must not be viewed in isolation from other traffic management and congestion-minimising measures, including encouraging modal shift away from private car. It is crucial that cleaner vehicles can deliver the optimum performance in an urban environment to reduce emissions and improve fuel efficiency savings.

## Appendix 2

- We would like to see a more considered approach, whereby journeys by bus or coach into central urban areas are more actively encouraged and those by private car are more actively discouraged.
- There is capacity on road based public transport to carry additional passengers and this would be the quickest, simplest and most efficient way to meet air quality targets.
- We would like to see a broad package of measures to encourage greater use of coach as an alternative to private car, such as road prioritisation measures in favour of public transport to speed up journey times and make public transport a more attractive option.

We welcome the opportunity to input to these proposals and would be happy to share information and expertise as the plans develop.

We look forward to the outcome of this consultation.

