

LOCAL AUTHORITY NO₂ PLANS

CHANGE REQUEST FORM

JAQU recognises that local authorities (LAs) may need to adjust some elements of the delivery of their local NO₂ plans based on their practical experience of implementation or a change in local circumstances. To consider such requests JAQU needs a clear audit trail to understand the reasons for, and the impact of, any proposed change to an FBC. Changes to measures or their delivery may have implications for compliance and/or the legal direction placed on LAs. This form asks local authorities to set out:

- What change is proposed and when?
- Why is the change needed?
- How is the change to be implemented?
- What is the impact of the proposed change?

Based on this JAQU should be able to consider changes to plans. Please discuss the change and the level of information needed with your account manager before completion. For significant and material changes further information may be requested.

CHANGE REQUEST FORM
Local Authority: Southampton City Council
Change Title: Quality bus partnership agreement as an alternative to a bus traffic regulation condition in Southampton
Approver (senior LA approver): Pete Boustred
Requester (main LA contact): Steve Guppy
Date: 16/04/20

CHANGE OVERVIEW (LOCAL AUTHORITY TO COMPLETE)

The measure this request relates to

Following the approval of Southampton City Council's (SCC) Local NO₂ Plan in March 2019 measures have been implemented as set out in accordance with the associated ministerial direction. This direction requires SCC to implement a Traffic Regulation Condition (TRC). This condition would require Southampton licensed buses to meet a minimum Euro VI diesel emissions standard or equivalent from the 6th January 2020.

This measure aims to supplement delivery of the Clean Bus Technology Fund (CBTF) by ensuring that bus operators who retrofit non-Euro VI buses through the fund to Euro VI equivalence do not replace retrofitted buses with non-Euro VI buses at their end of life, resulting in a regression of standards.

The preferred alternative proposal is to integrate the requirement for Euro VI or equivalent compliance into the upcoming Southampton Area Quality Bus Partnership Agreement (the agreement). The agreement will be implemented in summer 2020 and will require Southampton licensed buses that use Southampton's bus network to meet this standard amongst others. Buses that do not meet these standards will not be permitted use of Southampton City Council's priority facilities including bus lanes and priority signalling.

The change will effect timing of this measure. Implementation has been delayed as a result of the consultation process with local bus operators, internal teams and JAQU on both the previous measure and the proposed. The agreement is to be implemented in summer 2020.

The change will affect the approach to delivery of this measure - a formal TRC will not be implemented or enforced. Instead, buses must fulfil the agreement to have access to Southampton's bus network. SCC will retain the right to implement a TRC if compliance is not as expected.

Why Now?

An informal consultation on the proposed TRC was carried out in September. It was identified that significant objections were likely to be received from formal consultation which would delay delivery of this measure. Implementation would damage the council's relationship with local bus operators who provide a key public transport service. It was expected that by the date of the TRC's implementation, Southampton operators would meet Euro VI standards through the Clean Bus Technology Fund (CBTF). The CBTF involves retrofitting all non-Euro VI Southampton buses to Euro VI equivalent standards. Due to slippage, 44 buses were identified as not meeting Euro VI standard by the implementation date. Because of this, the TRC would have prevented these buses from operating in Southampton and caused significant unintended negative impacts to bus operators and the important public transport service they provide.

The CBTF retrofitting programme is now complete, with all Southampton buses meeting Euro VI equivalent standards. To maintain the Euro VI emission standard in Southampton's fleet, it is proposed that the requirement for Euro VI equivalent standards will be built into the agreement which is currently being drafted for adoption in summer 2020. This alternative is deemed beneficial over the original TRC as:

- The quality bus partnership agreement will meet the same aim as the TRC in ensuring that operators do not replace a retrofitted bus from the CBTF with an older emission standard bus. It was identified that this option is unlikely to result in significant objections through consultation;
- A route for delivery is already in place. The bus standard agreement will be implemented and enforced regardless through work with SCC's transport policy team in partnership with Hampshire County Council;
- SCC can continue to monitor and evaluate compliance with the agreement and, in the unlikely event that non-compliance is identified, the TRC can still be implemented;
- Allows a more flexible approach to extenuating circumstances (eg. train replacement services, emergencies).

Progress in maintaining standards will be monitored through an existing ANPR camera network. If it is identified that there is limited adherence to this aspect of the agreement, Southampton City Council retains the right to implement a TRC.

How is the change to be implemented?

Upon approval from JAQU, internal approval will then be sought from senior officers and relevant Councillors. A formal consultation can then be carried out followed by implementation if significant objections are not received. The agreement is expected to be implemented in summer 2020 regardless.

Impacts (Implementation measures)

The implementation of this alternative over the previous measure is unlikely to have any significant impacts on air quality in Southampton or the date at which compliance with NO₂ limits is achieved. All Southampton licensed buses now meet Euro VI standards through the CBTF programme of retrofitting. The aim of the agreement is to maintain this – the probability of non-compliance is low. SCC will retain the right to implement the TRC if non-compliance is significant. It is also intended that the need for a no-idling policy will be built into the agreement which could deliver additional air quality benefits not previously available.

Implementation Funding

It is expected that for any changes to Implementation Measures needed for compliance, local authorities should first look to cover these through existing funds provided and/or from any revenues where charging CAZs are in operation.

No additional costs anticipated. Existing budgets for the TRC will cover the consultation. The quality agreement will be implemented through existing means as business as usual for transport policy teams. The addition of the Euro VI requirement will not require additional resources. The remaining budget will be retained if a TRC is deemed necessary to implement. Related activities will be absorbed by existing SCC budgets and will be included as part of our public transport engagement programme.

Clean Air Fund grant variations only

It is not expected that additional Clean Air Fund awards to that already provided will be considered. This form is expected to address any variation LAs may wish to make in delivery.

CAF Impacts and delivery to date

Funding for this measure is provided through the Implementation Fund, as opposed to the Clean Air Fund.

CAF awards to date and proposed variation

As above.

Agreement to Proceed

JAQU to complete

Approved / Declined

Authorised Approver:

Date: _____

Conditions of Approval/Reason for rejection: