



Southampton City Council and New Forest District Council Clean Air Zone Consultation

September 2018

Response by the Confederation of Passenger Transport UK (CPT)

The Confederation of Passenger Transport UK is the trade association of the bus and coach industry, representing over 90% of all bus and 70% of all coach companies, and is recognised by Government as the voice of the sector, and the focus for consultation on legislation, local regulations, operational practices and engineering standards.

There are eight large operators and a number of smaller operators with premises inside the area bounded by the M27, and additionally there are a further 80 PSV operators within 15 miles of Southampton city centre, all of whom will likely be directly affected by the proposals.

Class B CAZ

A city wide Class B Clean Air Zone which will include Buses, Coaches, Taxis and Heavy Goods Vehicles (HGVs) is the Council's preferred option for implementing a Clean Air Zone.

However it is obvious and shown in figures published by the Council, that private cars, especially diesel cars are a major contributor to poor air quality in the city, whilst buses and to an even lesser extent coaches contribute only a very small percentage. To ensure that the proposed CAZ is effective and most likely to achieve the desired outcomes it is essential that efficient public transport is prioritised with radical steps taken to discourage car use and alleviate congestion in order to encourage a modal switch to bus and coach which will result in lower emissions per passenger.

The Government's Air quality plan for nitrogen dioxide (NO₂) recognises that buses and coaches are part of the solution for reducing nitrogen dioxide concentrations. CPT welcomes the decision by Southampton City Council to make available a £2.7m Clean Bus Technology fund to assist operators retrofit vehicles to Euro VI emissions standards. However whilst there are many retrofit solutions available for buses, there are currently no retrofit solutions available for coaches and CPT believe the modelling used by Systra to show the number of vehicles that will be either replaced or upgraded to be Euro VI due to the implementation of the CAZ is out of date and overly optimistic. The cost of a new Euro VI coach is between £270,000 and £300,000 and on-going discussions between CPT, the exhaust emission reduction retrofit manufacturers and the LowCVP/EST (who administer the Clean Vehicle Retrofit Accreditation Scheme¹) confirm that there is no prospect of a retrofit solution becoming available for any coach in the short term. Research by CPT indicates that there are currently only around 4,200 Euro VI coaches in the UK, out of a total fleet of around 25,000, so the ability to increase the number of compliant coaches at the rate suggested by



the modelling is extremely questionable. The modelling used is also unlikely to fully take into account the expected lifespan of a PSV, with operators expecting to depreciate a single deck bus over 12 years, a double deck bus over 15 years and a coach over 20 years.

Feedback from CPT Coach operating members is that the book value of existing Euro V vehicles in their fleets has been significantly reduced due to the requirement for Euro VI as a minimum for Clean Air/Low Emission Zones. The consequence of this is that operators cannot trade-in older vehicles and obtain a fair valuation in order to buy new vehicles. This, along with the lack of a CVRAS approved retrofit solution for Coaches and the short timescale available means that operators will encounter major difficulties upgrading their fleets to meet the proposed emission standards of the Clean Air Zone.

Modelling

It is disappointing that the modelling data used does not appear to include movements by bus and coach. Whilst bus movements are easily predictable and consistent on a daily basis, by not including coach movements it is impossible for the council to accurately assess the volume, duration and location of these journeys and to properly take into account the economic benefits added by this form of transport, nor properly assess any potential negative impacts of the proposed CAZ on coach operators and their customers. CPT would again point to the Government's Air Quality plan for nitrogen dioxide (NO₂) and the specific reference to regional coach operators and the benefits they can offer in reducing congestion and associated emissions.

Buses

Our members, who between them operate nearly all of the local bus mileage in Southampton, have already taken steps to improve and upgrade their fleets to meet Euro VI standards, and the significant investment from a Clean Bus Technology fund will help them deliver the reduction in NO_x and other harmful emissions that is required in the time frame available. However, despite the considerable amount of work and investment already made by operators not every configuration of Bus has a CVRAS accredited retrofit system available. Whilst it is likely that this will change, and systems will become available before the implementation date, consideration should be given to allow the small number of vehicles that potentially may not have a retrofit solution available at that time to continue to operate without additional charge in order to maintain a high level of service.

Coaches

Coaches provide services to a wide variety of people who need a cost effective and convenient mode of transport. The potential increase in the cost of coach travel due to having to use a newer Euro VI vehicle or through paying the daily charge, for activities such



as educational school trips, theatre visits, participating in or watching sport, and other tourist and group journeys could make them unviable. There will be a reduction in the economic benefit coaches and coach passengers bring to the city, whilst also possibly encouraging increased car use which will obviously further worsen air quality. The Sea City Museum, Tudor House Museum, Southampton City Art Museum, Solent Sky Museum and the Mayflower Theatre are all popular destinations frequently served by our members, and fewer journeys to these locations will surely damage the local economy.

CPT is extremely concerned about the adverse impacts the proposed CAZ will cause to older and more vulnerable members of society, and also for school and educational trips. These groups rely on coaches to provide low cost, accessible, safe and convenient travel, and in many cases will have no other viable transport options available to them.

CPT would urge Southampton City Council to carry out additional research and modelling into the benefits and overall effect of coach travel into the city before deciding on the vehicles to include in the CAZ charging scheme.

Operator Case Study

As part of its overall business CPT member Eavesway Travel operates a large number of cruise transfers annually in and out of the Port of Southampton, as well as a number of sports and private hire related journeys, and will be representative of a medium sized coach operator in the UK.

Following extensive investment over a number of years Eavesway Travel operates a modern fleet of 30 coaches all of which are wheelchair accessible. Of these 11 are Euro VI emission standard and 19 conform to Euro V standard.

With the current short timescales proposed for the introduction of Clean Air and Low Emission Zones throughout the UK, the inevitable effect has been a significant increase in the depreciation, and consequent reduction in market value of the operators Euro V vehicles, the majority of which only date from 2013/14 when Euro V was the highest standard available.

The operator is already committed to upgrading their entire fleet to the Euro VI standard, but this task is being made much more difficult within the proposed timescales by the gap in funding between the value of still relatively new Euro V and the latest Euro VI vehicles. This funding gap has been artificially widened by the unrealistic timescales imposed by the proposed introduction of the CAZ.

The inclusion of Coaches in the Class B CAZ under a very short timescale will undoubtedly have an impact on the business of this well respected company, who annually bring over 56,000 cruise passengers to/from Southampton.

Rail Replacement and Unexpected Events

There will be occasions when large numbers of Coaches and Buses are required to meet an urgent transport requirement, such as to provide replacement transport during periods of planned or unplanned disruption to the rail network. As we have demonstrated earlier in this response the practicalities of ensuring fully compliant vehicles are always available to meet short notice requirements is extremely challenging. It would not be proportionate for PSV operators, Network Rail or the TOC's to be disadvantaged or discouraged from providing emergency transport in these cases.

There are other occasions when non-compliant vehicles could be forced to enter the CAZ due to an unforeseen event, such as an emergency closure of the M27.

In these cases having a mechanism to allow for a temporary suspension of the CAZ should be considered in order not to penalise operators in such an emergency situation.

ABP Southampton

It is important that the contribution made to air quality in Southampton by the Port is not underestimated, and CPT welcome the Air Quality Strategy published by ABP which demonstrates their commitment to improve air quality.

The Cruise Terminals generate a significant amount of coach traffic which in turn helps the terminals create an economic benefit to the city. Due to the nature of the transfers, some of the vehicles utilised will already be Euro VI, but there will still be a number that are of a lower emissions standard, and the previous comments about the viability of buying new vehicles or upgrading existing vehicles should be taken into account here as well. Coaches serving the cruise terminals spend a very short time driving within the city, and therefore contribute minimally to poor air quality. Including these vehicles in a Class B CAZ is disproportionate and could very possibly lead to cruise vessels relocating to other ports which again will have a detrimental effect on Southampton's economy.

Red Funnel Ferry Terminal

The Ferry terminal also generates coach traffic through Southampton. Coaches serving the ferry terminal spend a very short time driving within the city, and therefore contribute minimally to poor air quality. Including these vehicles in a Class B CAZ is disproportionate and again will have a detrimental effect on Southampton's economy and also that of the Isle of Wight.

CPT Position

CPT supports Southampton City Council's desire to improve air quality, and we believe that policies that prioritise and maximise public transport use will greatly assist in achieving the stated goals. We would encourage the council to explore options for bus priority measures wherever practical as this has been shown to alleviate congestion, reduce emissions and research has shown that there can be a £7 economic benefit for every £1 invested in effective Bus infrastructure.²

However it should be noted that the contribution to poor air quality made by buses and coaches is very small compared to other modes, and this should be taken into account when deciding which vehicles are included in the charging scheme. To ensure the success of a Clean Air Zone any decision made must be made based on the available evidence, and not on political expediency.

We believe that the implementation of a Class B CAZ which will result in charging non-compliant coaches is disproportionate to the overall impact coaches have on air quality and will result in unintended negative economic and social consequences.

In the short term it would be envisaged that fares/prices will have to increase to fund CAZ related costs imposed on operators. This will almost inevitably lead to more people travelling by private car thereby contributing to further congestion and pollution in the City. Figures published by Southampton City Council already show that cars, within the designated area contribute 23.9% toward existing pollution whilst the contribution from Coaches is negligible. This would not be a welcome outcome, if the longer term objective is to improve air quality.

We would urge the Council to consider an alternative approach that recognises the issues the sector faces upgrading their vehicles along with the economic and social benefits coach travel bring to the city, and either excludes coaches from the CAZ charging scheme, or delay implementation until there is a viable solution to upgrade existing vehicles to Euro VI.

Mark Purchase

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1. <http://www.energysavingtrust.org.uk/transport-travel/transport/clean-vehicle-retrofit-accreditation-scheme-cvras>
2. Source: Improving Air Quality In Towns and Cities- why buses are an integral part of the solution, Professor David Begg, 2017