

Appendix 2

Responses to consultation with bus operators

Bus operator and whether the proposed low frequency exemption would apply	Comment from bus operators to proposals
<p>Big Lemon</p> <p>Low frequency service – proposed exempt</p>	<p>The below looks good. [proposals]</p> <p>Ref the exemptions, I think hourly or less would be a suitable cut-off. With breakdown cover buses would there be a maximum number of occurrences each week/month and presumably they would be notified within 24 hours of the use (impossible to pre-notify due to the nature of breakdowns...)</p> <p>In answer to your question about how many journeys we operate/expect to operate in the zone, we currently operate two morning journeys and one evening journey to Brighton Station on the 52 service at approx. 7am, 8.30am and 7pm and expect to be doing the same in a year's time. This service runs 6 days per week so the total weekly occurrences would be 18. These journeys are run with buses retrofitted to Euro 4 standard and I do not expect that we will be able to afford to have them retrofitted to Euro 5, although I would love that to be possible!</p>
<p>Brighton & Hove Buses</p> <p>Not exempt</p>	<p>The date of 1 January 2015 is just one year away and gives us significantly less time to prepare than the Oxford scheme upon which it is based.</p> <p>In principle we support the scheme but the shorter the lead time the more flexibility on exemptions we would need.</p> <p>We are comfortable with Euro 2 buses not being allowed in the LEZ.</p> <p>Excluding the SCRT conversions we have 53 Euro 3 buses. Of these, 20 are due to be replaced in July 2014 which leaves 33 in service at 1.1.15.</p> <p>We need to be certain that these converted buses are categorised as "Euro 5" in the scheme and are allowed to operate freely in the LEZ area and would be grateful if the City Council could provide us with an absolute assurance on this point.</p> <p>The earliest we could replace these 33 buses would be in our financial years 2015/16 and 2016/17, where we would plan to purchase 20 new buses each year. Therefore we could comply with no Euro 3 buses by 1.1.17.</p> <p>We currently have 56 Euro 4 buses. The earliest we could replace these would be in financial years 2016/17 (the balance of 7 from the Euro 3s above), 2017/18 (20), 2018/19 (20) with the final ones (9) in 2019/20, thus we could comply with no Euro 4 buses by 1.1.20.</p> <p>We therefore need a minimum of a 2 year exemption for Euro 3 buses and a 5 year exemption for Euro 4 buses, which actually reflects the difference in lead time between this scheme and the Oxford scheme.</p>

	<p>If another funding stream becomes available and we are successful then we would commit to discussing revised exemption criteria based on the number of buses that could be converted.</p> <p>Should significantly adverse pressures on costs or revenues occur (for example a significant reduction in bus priority or a significant reduction in funding) then we would need to renegotiate the deadlines. Conversely, should operating and economic conditions become more favourable for the bus network it may be possible to advance the rate of investment.</p> <p>We are comfortable with implementing a 1 minute switch engine off policy that is similar to the Oxford scheme.</p> <p>We would be committing to a significant long term investment programme to meet the LEZ criteria and whilst we support the LEZ objectives it is our belief that the data provided by the City Council demonstrates that the biggest improvements can be realised where traffic can be made to flow well.</p> <p>One of the roads with the highest readings is Viaduct Road which has few buses but very slow moving traffic. We would therefore expect a commitment from the city council to target traffic congestion “hot spots” and improve traffic flow as an effective way of reducing emissions.</p> <p>We would also expect that other fleets of diesel vehicles in the city centre are studied and targeted for emissions reductions.</p> <p>We are committed to a number of other measures to improve air quality, including employing a team of people at Churchill Square to improve the flow of buses and minimise waiting time; we have already introduced a policy of switching off engines when a bus is expected to be stationary for three minutes; we have fitted all our buses with telematics to improve fuel efficiency through smooth driving; we are working with Ricardo in Shoreham to optimise engine performance and we are looking at ways of rationalising bus stops in the city centre area to improve traffic flow.</p>
<p>Community Transport (B&H Area)</p> <p>Low frequency service – proposed exempt</p>	<p>You advised that the City Council’s proposals for Low Emission Zones in Brighton are to apply a Euro V vehicle standard, but for this to apply only to local bus services registered as such with the Traffic Commissioner, and that enforcement will use the provision for the Traffic Commissioner to impose an appropriate Traffic Regulation Condition on the local services in question. You also advised that there would be an exemption from the LEZ regulations for low frequency services.</p> <p>In the light of the fact that Community Transport currently operates only one local service in central Brighton (Bus 130), which is a low frequency service (one journey per day in each direction, Mondays to Fridays), I am satisfied that we will not, in practice, be affected by the LEZ. This leads me to recognise that many of the questions I raised in my earlier e-mail are no longer relevant.</p> <p>I also confirm that, should the scheme be introduced as described, we will be prepared to instruct our drivers to switch off the engine, should the vehicle be stationary for one minute or more within the LEZ. This is likely to apply in practice only when the vehicle is at its terminal point at Bus Stop D at the northern end of Queens Road.</p>

<p>Compass Travel</p> <p>Not exempt</p>	<p>Thank you for this update on the proposed Brighton LEZ. I can confirm that all our buses that normally use this zone are already Euro 5 compliant. The only exception would be the very occasional emergency use of an older bus to cover for a breakdown. I understand that there would be an exemption for this but I am interested to know how that would work? [clarification provided in response to this question to which the following reply was provided by compass travel] I'm sure something like this could work with just a simple notification if an older vehicle ever had to be used – which as you say should only happen very rarely</p> <p>We normally have six buses that would use this LEZ which operate on an hourly basis in each direction giving 12 buses an hour (Mon-Sat). On Sundays (and public holidays) we also have a route which enters the LEZ 5 times during the day and a second route which operates twice a day into the LEZ – and both these routes would have Euro 5 buses.</p> <p>I am happy with this LEZ scheme as proposed – and would only potentially have a problem if it was extended further outside this central area.</p>
<p>The Sussex Bus Co</p> <p>Routes 33 and 40X do not enter zone</p> <p>Route 40 not exempt</p>	<p>We currently run three services into Brighton: 33, 40 & 40X, each service operating one return journey into Brighton per hour.</p> <p>The current dedicated fleet operating these services are 20% Euro4, 65% Euro3 and 15% Euro 2. However we are currently upgrading our fleet further and by Jan 2014 would consider that our fleet would be 50% Euro 3 / 50%Euro4.</p> <p>We will probably by then still have some Euro2 engined vehicles on the fleet as back up vehicles which may occasionally be operated into Brighton.</p> <p>Would need a long term temporary exemption before we could meet Euro 5 standard</p> <p>We would be comfortable with introducing an engine switch off policy for vehicles waiting more than one minute at a bus stop.</p>
<p>Stagecoach</p> <p>Not exempt</p>	<p>All vehicles require to operate on the 700 service corridor are all to Euro 5 standard , and are either Exhaust Gas Recirculation or Selective Catalytic Reduction (SCR)</p> <p>On the 17 Horsham Brighton service the vehicles scheduled to operate are to Euro 4 standard SCR</p> <p>Within our Worthing fleet we do have vehicles that are to Euro 3 standard but these would only find them selves on any of the other routes should a problem occur</p> <p>For the Future</p> <p>We may well consider operating the 700 Service Littlehampton to Brighton with 30 D/D all at Euro 5 EGR specification.</p>

	<p>A breakdown of our current fleet available to operate the 700 and 17 service is attached the 5 x Euro 4 vehicles are highlighted in green</p> <p>We feel that the 1 minute switch off policy should be dependant on operating experience in relation to adverse engine warning systems due to problems at times caused by congestion.</p>
<p>Cuckmere Community Bus</p> <p>Low frequency service – proposed exempt</p>	<p>We are a minor player in your consideration, providing just 2 journeys a month into central Brighton from the small villages between Lewes and Polegate (service 38). None of our vehicles complies with the current London LEZ requirements, and as we go there very infrequently, it would not be cost effective to comply. The same will apply to our Brighton service at present, and it remains to be seen whether or not we can afford to acquire new or newer compliant vehicles within the timescale you mention. If it is possible for a non-compliant vehicle to enter the area on payment of a fee, we may do this, but it will depend upon the level of that fee and the number of passengers travelling. If that is not possible, we may have to withdraw the service.</p> <p>[clarification provided in relation to low frequency services exemption to which the following response was received - I think the remarks in my earlier e-mail stand, although I have now seen the Oxford guidance, thank you.</p> <p>Whilst I agree with the general thrust of what the Council seeks to achieve, I do not think we will be able to comply, even in 2 years time. Once we have identified a suitable replacement bus, our priority will be to put that to work on a regular headway service, such as in Hailsham or Seaford, rather than the occasional run, which our Brighton service 38 is. We run two days a month, one journey each day and would therefore hope that the City Council could agree an exemption on the grounds of very low frequency. If we do proceed with the conversion of one of our fleet to run on Pure Plant Oil (zero emissions) this might be used on the Brighton service. The problem with that is the cost of the oil, which currently is over £2.00 a litre, and therefore does not make economic sense!]</p>