



environmental protection, improvement, innovation

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Dear Sir or Madam

NSCA Response to the Local Transport Bill Consultation

I am writing on behalf of NSCA's Air Quality Committee in response to the consultation document 'Strengthening local delivery: The draft Local Transport Bill'.

The Committee has considered the consultation document and welcomes the opportunity to comment on the proposals.

About NSCA

NSCA (National Society for Clean Air and Environmental Protection) is the environmental protection charity that brings together organisations across the public, private and voluntary sectors to promote a balanced and innovative approach to understanding and solving environmental problems, through policy development and education. We are a registered charity with over 100 years experience of environmental campaigning, public information provision, producing educational resources and policy formulation.

NSCA's Air Quality Committee brings together policy makers, regulators and practitioners from central and national Government, local authorities, consultants, developers, academics, the Environment Agencies, industry, interested NGOs as well as members from the NSCA regional divisions. As such it is able to draw on a wide range of expertise and views from representatives of the entire air quality community. Further details are available at www.nasca.org.uk.

NSCA Views on Chapters of the Consultation Document

In our response to the consultation we have not attempted to answer the specific consultation questions, but have given our views below on the issues raised in each chapter of the document.

Chapter 3

Partnerships and Contracts

NSCA supports the theme of the Bill's proposals in giving local authorities and their partners sufficient powers to implement bus schemes, yet the flexibility to implement programmes suitable for their particular localities. In particular the measures designed to make voluntary and quality partnerships more attractive and easier to implement should have a positive effect in the majority of local authorities that exist outside of

major metropolitan areas, as experience suggests that this route is how many smaller towns and cities can secure major improvements to their bus services.

The new arrangements allowed under the Bill are, however, only half of the process, and local authorities should be provided with guidance to help them to decide which arrangements would be most applicable to their area, linking in with the Local Transport Plan review process where necessary. A great deal of best practice has already been identified by DfT in this area, and the effectiveness of schemes used in cities such as Cambridge, Oxford, Brighton and London (and rural examples) should be researched and presented to local authorities along with detailed guidance on the new options available through the Bill. A new Beacon theme may also be appropriate.

It is not clear from the consultation document whether voluntary and quality partnership arrangements will be able to stipulate emission and other standards for buses. Improving bus patronage can be one of the main avenues through which local authorities can secure improved air quality, however ironically old dirty buses can produce the equivalent air pollution of a great many cars. It is therefore important that voluntary and quality partnership arrangements should be able to stipulate minimum Euro standards for buses; the new arrangements will allow these to be phased in, easing the burden for operators with older fleets. Standards could also be set for comfort and cleanliness, a lack of which can dissuade people from using buses.

Punctuality

The suggestions for widening responsibility for bus punctuality are sound, the local authority as the road network manager has a great deal of influence on bus punctuality. We would suggest, however, that the traffic commissioner should be able to cast the net wider when investigating punctuality issues, and that utility companies, the Highways Agency and Network Rail (all where appropriate) should be required to attend or give evidence at investigations. The rail network in particular can cause major punctuality problems in areas with many level crossings and/ or long down times, and it would be useful for the traffic commissioner to bring additional pressure to bear to improved signaling (to shorten down times), and replace crossings with tunnels and bridges where appropriate.

Subsidies

The review of the Bus Service Operators Grants hinted at in section 3.55 is welcome, as is the example criteria mentioned. The current BSOG does not adequately reward success in improving passenger numbers, provides no incentive for lower emission buses, and, by making diesel relatively cheap, dissuades investment in alternative fuels. We would like to see BSOG reward operators who improved patronage, introduced buses with higher Euro emission standards, and support investment in low CO₂/ emission technology such as biomethane and hydrogen fuels.

Chapter 4

We support the theme of the proposals on governance in this chapter. The changes outlined should improve inter-authority co-operation on local transport, yet allow local authorities sufficient flexibility to implement solutions that are most suitable for their area.

Again the new arrangements under the Bill will be only the first part of the process, and the development of appropriate guidance will be crucial to help local authorities make a full and thorough review of local provision. We suggest that air emissions and

noise issues from traffic should be integrated into this review process alongside economic and social considerations, and would like to offer our assistance in developing this part of the guidance. In terms of the lead authority for the review, we would suggest that the local authority covering the identified main economic centre of the metropolitan area would perhaps be the most appropriate body to co-ordinate the process.

Where a PTA/ E system is established we are concerned that the duties outlined in section 4.37 are incomplete, and in particular the proposal that PTAs must have regard to Government policies and guidance on climate change is too narrow. Although climate change is the major environmental issue of our age we should not forget that poor air quality is responsible for a great number of premature deaths in the UK, and has a marked negative effect on health and wellbeing. The soon to be released WHO report on the burden of disease from environmental noise proves a similar link between noise and premature deaths/ quality of life. We suggest that the PTA requirement be expanded to *'PTAs must have regard to Government policies on climate change and local environmental'*.

A further area of concern is the fate of Air Quality Action Plans (AQAPs) in areas where PTAs are established, and the requirement to produce a 10-15 year Integrated Transport Strategy introduced. Under DfT encouragement, many local authorities have started to integrate their Air Quality Action Plans into their Local Transport Plans, a process that has only just gathered momentum. Whilst we support the idea of Integrated Transport Strategies, and believe they should contain an air quality element, moving AQAPs solely into the new ITSs could potentially become complicated and divorce the plans from other areas of local authority activity that can affect air quality (e.g. planning).

We would suggest that DfT guidance should be changed to allow a flexible response by local authorities in deciding where to position their air quality action plans. This could build on best practise, for example a joint Air Quality Action Plan that could potentially sit alongside an ITS (as developed in Greater Manchester), or a combined climate change and air quality strategy for individual local authorities that could be mirrored in the ITS (e.g. Southampton).

Chapter 5

We support the changes suggested in this chapter that would ease the process of setting up local road pricing schemes. Any schemes set up should reduce congestion, and with it improve urban air quality. The suggestions on consistency and interoperability are sensible; compatibility between local schemes removes one area of possible public contention from the scene.

We would suggest that, in the guidance provided to local authorities alongside the new powers, the lead and experience that London has in this area should not be forgotten. In particular the current consultation on the introduction of Emissions Influenced Congestion Charging in London gives hope for schemes that are designed to both relieve congestion and cut emissions of both local air pollutants and carbon dioxide. If early indicators suggest this revised scheme is proving successful other local authorities considering congestion charging should be encouraged to follow suite, in effect enabling them to leapfrog the initial London scheme and introduce best practice.

Such guidance would fit in well with clause 71 in the draft Bill, that is the statutory requirement that local authorities in England and Wales have regard to potential environmental impacts when considering introducing a scheme, a clause whose inclusion we strongly support.

Chapter 6

We do not have any views on this section of the draft Bill.

If you require any further information on the views expressed in this response please get in touch using the details at the top of this letter.

Yours Faithfully

Ed Dearnley
Policy Officer