



Department  
for Environment  
Food & Rural Affairs



Department  
for Transport

Pam Turton  
Portsmouth City Council  
Civic Offices  
Guildhall Walk  
Portsmouth  
PO1 2AL

5 March 2019

Dear Pam,

### **Initial plan for delivering compliance in the shortest possible time**

Many thanks to you and your team for coming to present your initial plan, in the form of a Strategic Outline Case, and discuss progress with Portsmouth City Council's plan to deliver NO<sub>2</sub> compliance in the shortest possible time on 26 February.

We had a good, constructive discussion that enabled us to better understand how you had arrived at your short list of options that were presented in the initial plan you submitted. I have summarised the main points below.

- We discussed that your shortlisted options contain a high number of individual measures, you will need to ensure that each of these measures are necessary to deliver compliance.
- We discussed that the shortlisted options all need to deliver compliance in the shortest possible time.
- We discussed your benchmark option which is a charging Clean Air Zone, class B and that you will need to remain aware that future evidence may indicate that a higher level of Clean Air Zone may need to be reconsidered as the benchmark.
- We discussed the project timeline and current date for the Initial Evidence Submission due to be submitted to JAQU in June 2019. This is quite late and we noted it will be important for you to explore whether this can be brought forward. We discussed you will need to accelerate the modelling timeline as this needs to be completed before the final plan submission.

Annex A details the main comments following review of your initial plan. You will need to be working on these to develop your final plan, in the form of an Outline Business Case as well as considering the guidance already provided to you on [huddle](#). I understand there is a technical session on the development of the Outline Business Case scheduled for 26 March with your team and JAQU officials.

As you are aware, it is essential that the preferred measure identified in the final plan delivers compliance in the shortest possible time. We expect local authorities to develop detailed timelines to set out implementation of each proposed measure so that we can clearly understand the delivery timeline and how this relates to the modelled compliance year. Following acceptance of your final plan we will look to require you to implement your identified measures with interim steps including: completion of all necessary public consultation for the preferred scheme; and provision of a Full Business Case that sets out detailed proposals for the scheme and sets out the commercial and contractual arrangements, affordability, and management arrangements to ensure successful delivery of the scheme can start. We expect these to be required in late 2019 (where a statutory consultation is not required) and early 2020 (where a statutory consultation is required). This is to ensure implementation of the required measures starts in 2020 and for compliance to be delivered in the shortest possible time.

As you are aware and is set out in our guidance, local authorities are required to shortlist, and take forward for full modelling, the lowest level class of charging Clean Air Zone that will deliver compliance in the year after implementation, as the benchmark option (unless they have provided clear rationale why this is not appropriate). The benchmark option is an important tool in helping to define what 'shortest possible time' means for each local authority area and provides a tangible illustration of the minimum expected of other potential policy options. As outlined in the Technical Report alongside the UK Plan, should a charging Clean Air Zone be suitable for your area, we expect this to be implemented in 3 years or quicker from starting to develop a local plan (i.e. October 2018 direction). Given the potential impacts on individuals and businesses, when considering between equally effective measures to deliver compliance, the UK Government believes that if a local authority can identify measures other than a charging Clean Air Zone that are at least as effective, these measures should be preferred as long as the local authority can demonstrate that this will deliver compliance at least as quickly as a charging Clean Air Zone.

We remain committed to support you as much as possible through this process. If there is anything further you would consider helpful, please let me, or your account manager, Kellie Taylor know.

Yours sincerely

A handwritten signature in black ink, appearing to read 'AJ Jackson', with a long horizontal flourish extending to the right.

**ANDREW JACKSON**

**HEAD OF JOINT AIR QUALITY UNIT**

## **Annex A:**

Please see below main comments from Portsmouth's Strategic Outline Case review. These are critical points that need to be addressed for the final plan, in the form of an Outline Business Case, submitted on or before 31 October 2019. It is highly recommended you refer back to the comprehensive guidance packages available on [huddle](#) as well as participate in the Outline Business Case workshop on 8 March which will provide more detail on what should be included.

### **Economic Case:**

- The shortlist does not demonstrate that each option delivers compliance in the same time.
- Need to ensure all measures that make up the 3 non charging options are necessary to deliver compliance in the shortest possible time.
- As the options develop it will be important to be clear how the scoring system translate to what options have been taken forward.
- Need to provide assessment of value for money as a secondary success factor.

### **Financial Case:**

- Need to provide capital and revenue constraints.
- Need to provide an outline of the resources available for the project.

### **Management Case:**

- More detail on delivery and task breakdown required for the project timeline.
- Need to provide information of stakeholder engagement and list of current stakeholders.