

Agenda – Climate Change, Environment, and Infrastructure Committee

Meeting Venue:	For further information contact:
Hybrid: Committee room 4 Tŷ Hywel and video Conference via Zoom	Marc Wyn Jones Committee Clerk
Meeting date: 26 May 2022	0300 200 6565
Meeting time: 10.30	SeneddClimate@senedd.wales

Private pre-meeting (10.30–10.45)

Private briefing – Bus and rail transport in Wales: public engagement findings

Public meeting

1 Introductions, apologies, substitutions, and declarations of interest

(10.45)

2 Bus and rail transport in Wales – evidence session 1

(10.45–11.50)

(Pages 1 – 71)

Mark Barry, Professor of Practice in Connectivity – School of Geography and Planning, Cardiff University

Professor Graham Parkhurst, Director, Centre for Transport and Society – University of the West of England

Attached Documents:

Research brief – Inquiry into the future of bus and rail services

Paper – Bus and rail engagement findings

Paper – Stakeholder event on bus and rail services



Senedd Cymru
Welsh Parliament

Paper – Mark Barry, Professor of Practice in Connectivity

Paper – Professor Graham Parkhurst

Lunch break (11.50–12.20)

Private pre-meeting (12.20–12.25)

3 Bus and rail transport in Wales – evidence session 2

(12.25–13.30)

(Pages 72 – 81)

Silviya Barrett, Director of Policy and Research – Campaign for Better Transport

David Beer, Senior Manager Wales – Transport Focus Wales

Joe Rossiter, Policy & External Affairs Manager – Sustrans Cymru, representing Transform Cymru

Attached Documents:

Paper – Campaign for Better Transport

Paper – Transport Focus Wales

Paper – Transform Cymru

Break (13.30–13.40)

4 Bus and rail transport in Wales – evidence session 3

(13.40–14.45)

(Pages 82 – 92)

Bev Fowles, Vice Chairperson – Coach and Bus Association Cymru (CaBAC)

Gemma Lelliott, Director for Wales – Community Transport Association (CTA)

Jane Reakes–Davies, Chair – Confederation of Passenger Transport Cymru (CPT)

Josh Miles, Director – Confederation of Passenger Transport Cymru (CPT)

Attached Documents:

Paper – Community Transport Association (CTA)

Paper – Confederation of Passenger Transport Cymru (CPT)

5 Papers to note

(14.45)

5.1 Bus and rail transport in Wales

(Pages 93 – 112)

Attached Documents:

Paper – Tim Peppin – Welsh Local Government Association (WLGA) – officer response

Paper – Professor Kiron Chatterjee

5.2 Water quality and sewage discharges: storm overflows

(Pages 113 – 122)

Attached Documents:

Welsh Government response to the Committee's report on storm overflows in Wales

5.3 Scrutiny of Natural Resources Wales

(Pages 123 – 124)

Attached Documents:

Welsh Government response to the Committee's annual report on Natural Resources Wales

5.4 Single use plastics

(Pages 125 – 127)

Attached Documents:

Letter from the Chair to the Minister for Climate Change in relation to the exclusion to the UK Internal Market Act for single use plastics

5.5 Common frameworks

(Pages 128 – 134)

Attached Documents:

Letter from the Convener, Net Zero, Energy and Transport Committee, The Scottish Parliament to the Chair in relation to environmental provisional common frameworks

Response from the Chair to the Convener, Net Zero, Energy and Transport Committee, The Scottish Parliament

Letter from the Chair to the Minister for Climate Change in relation to the Committee's report on provisional common frameworks for air quality, and for chemicals and pesticides

Letter from the Chair to the Chair, Common Frameworks Scrutiny Committee, House of Lords in relation to the Committee's report on provisional common frameworks for air quality, and for chemicals and pesticides

Letter from the Chair to the Interim Chair, Environment, Food and Rural Affairs Committee, House of Commons in relation to the Committee's report on provisional common frameworks for air quality, and for chemicals and pesticides

5.6 Energy price crisis

(Pages 135 – 136)

Attached Documents:

Letter from the Chair to the Minister for Climate Change in relation to the energy price crisis

5.7 Inter-Institutional Relations Agreement (IMG) for Housing, Local Government and Communities

(Page 137)

Attached Documents:

Letter from the Minister for Finance and Local Government to the Chair in relation to the Inter-Institutional Relations Agreement (IMG) for Housing, Local Government and Communities meeting on 24 May

5.8 Decarbonisation of housing – additional written evidence from stakeholders following the Committee's meeting on 28 April

(Pages 138 – 169)

Attached Documents:

Additional written evidence from Christopher Jofeh

Additional written evidence from Dr Ed Green, Welsh School of Architecture

Additional written evidence from Pobl Group

Additional written evidence from Linc Cymru

Additional written evidence from ClwydAlyn

Additional written evidence from Community Housing Cymru

5.9 Marine environment management: debate on Committee's report

(Pages 170 – 182)

Attached Documents:

Letter from RSPB Cymru in relation to the plenary debate on the Committee's report on the Welsh Government's marine policies

Paper from Marine Conservation Society in relation to the plenary debate on the Committee's report on the Welsh Government's marine policies

5.10 The Queen's speech 2022 – proposed legislation

(Pages 183 – 184)

Attached Documents:

Letter from the Counsel General and Minister for the Constitution to the Chair of the Legislation, Justice and Constitution Committee in relation to the UK Government's proposed legislation outlined in the Queen's speech 2022

6 Motion under Standing Order 17.42 (vi) and (ix) to resolve to exclude the public from the remainder of today's meeting

(14.45)

Private meeting (14.45–15.00)

7 Bus and rail transport in Wales – consideration of evidence heard under items 2,3 and 4

8 Consideration of the Committee's forward work programme

(Pages 185 – 190)

Attached Documents:

Paper – Forward work programme

Document is Restricted

Welsh Parliament

Climate Change, Economy, and Infrastructure Committee

Bus and rail transport in Wales.

Engagement findings report

May 2022

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4. How to address the barriers to using Welsh bus and rail services and increase public transport use 24

1. Background

As part of the Climate Change, Economy, and Infrastructure Committee's¹ inquiry into 'Bus and Rail Transport'², the Citizen Engagement Team³ proposed a qualitative approach to engagement, comprising a series of focus groups and interviews with passengers.

Participants

Participants were sourced through Committee Members, community groups, and organisations including Transport for Wales, the North Pembrokeshire Transport Forum, the Snowdonia Society, GIG Buddies, Rail Future Wales, and Community Transport Wales.

A screening survey was used to identify potential participants. Participant composition varied and included both bus and rail passengers; people with disabilities, people living and working in rural, urban and tourist areas; and business owners.

Thank you to everyone who contributed to the programme of engagement.

Engagement

A series of five focus groups and six one-to-one interviews⁴ took place between 21 March and 21 April 2021. The format of engagement was largely comparable between sessions but varied slightly to meet the needs of participants. The following themes were discussed:

- Participants' travel needs.
- What impact the pandemic has had on public transport use.
- The real and perceived barriers to using Welsh bus and rail services.
- How to address the barriers to using Welsh bus and rail services.
- How to encourage behaviour change to increase public transport use.

¹ [Climate Change, Environment, and Infrastructure Committee \(senedd.wales\)](#).

² [Bus and rail transport in Wales \(senedd.wales\)](#).

³ [Have your say \(senedd.wales\)](#).

⁴ An anonymised transcript of each session is available to Members of the Committee and Commission staff upon request.

2. The impact of the Covid-19 pandemic on public transport

1. All participants agreed that the COVID-19 pandemic (the pandemic) had a substantial and often negative impact on the provision of public transport and its use. Participants felt that public messaging, safety concerns, service disruption, and a change in passenger needs were key themes.

Public messaging

2. Participants agreed that Welsh Government messaging, particularly during the first lockdown, scared the public to such a degree that encouraging people to return to public transport will be difficult, if not impossible for some groups.

Public transport was for essential users only. There was a fear that we couldn't go on them. The message was very much that public transport was not for everyday use. They created a perception that public transport wasn't always safe and I don't think that it was true.

The pandemic created such a big challenge because the message that went out was for people to avoid travelling as much as possible. But in the context of a world where we're trying to get more people to use public transport, that was quite a risky message.

Transport for London did thorough tests of the station, infrastructure, and interiors of trains. Despite the London underground having a much higher usage during lockdown, they didn't find any traces of Covid. I'm not downplaying how serious the virus was, and can still be, but there was far too much scaremongering about public transport. It really pushed people away from using public transport.

3. Participants agreed that a substantial effort is needed to reverse the messaging.

You've got two years of the message being "don't use public transport" to overturn, and that's not an overnight thing. You have to build confidence. You have to show, and demonstrate that it's reliable and consistent, and you have to put the passenger first, not the operational needs, not the need for that train to be somewhere else. The passenger has to believe they're going to be looked after. It's a culture change, I suppose.

Safety concerns

4. Participants felt that many people continue not to use public transport because they are scared as a consequence of the pandemic. Many identified the elderly, vulnerable, and people with health concerns as the most unlikely to return to public transport.

A lot of community transport passengers are older and extremely vulnerable. They were told to shield, stay at home, and protect themselves. We've seen a huge number of people that were regular passengers deteriorate to such an extent that they no longer leave the house.

Unfortunately, particularly among the older demographic, there's a significant number of people that just do not travel anymore. A lot of it is because they're afraid of going back out into the world and particularly using transport as part of that.

My wife and I, who are retired, have not really got comfortable again with public transport at all. We were heavy users of public transport, particularly on the Carnarvon to Bangor line before the pandemic. For a long time, we just did not use public transport at all. We're still somewhat reluctant to do so.

5. However, some participants told of how safe they felt, and continue to feel, using public transport.

I haven't been worried about catching covid on the train, although I'm sure it does worry a lot of people.

At the beginning of the pandemic, I felt a nervousness about travelling on public transport just due to the nature of being told not to be in crowded spaces. I work in a hospital and a lot of my colleagues travelled to work by public transport, so I wasn't nervous anymore because none of them were adversely affected through travelling on public transport, there weren't any issues. So that put my mind at rest. If I needed to take the bus I would. My colleagues were using it day in and day out and there were no issues.

Service disruption

6. Participants told of reduced services and service disruption due to the pandemic.

My sister has a learning disability and she relies on the bus services to get to work. Quite often the bus didn't show up or the timetable wasn't running to schedule. I think public transport was a bit unreliable during the pandemic, either with late services or buses not showing up at all.

A real barrier for people during the pandemic was the changes to the timetables and routes on the buses. It was very confusing for some and almost impossible to find up-to-date information.

- 7.** Participants with disabilities described the difficulties and discrimination they experienced due to changes and disruption to services during the pandemic.

There was a big problem with buses not stopping to pick people up. The bus to Llandudno was reduced to one an hour. A lot of the time the drivers would drive straight past me and not even stop, they would ignore me. Because I'm in a wheelchair they thought it would take too long to get the ramp out and give me time to get on the bus. So they didn't bother stopping. It's annoying when drivers don't stop.

Nine out of ten drivers displayed a lot of arrogance and were on a power trip when they got to tell people they couldn't get on the bus. This has left a mark on the people of Llandudno, not just the disabled community but everyone.

- 8.** Participants also spoke of the ongoing disruption in service that they are still experiencing.⁵

In North Wales, the Avanti West Coast service to London was severely curtailed and is still only running two services a day from North Wales to London. There are additional services from Chester but they terminate at Crew. So travel from Chester is, not impossible, but difficult.

There is a particular issue with the rail services along the North Wales coast. The level of service has still not been restored to what it was before COVID. This frustrated me because I'm used to having an hourly service to Chester and Manchester and that service disappeared with the pandemic and hasn't returned.

We have a real problem here in Pembrokeshire in that there are hardly any trains. The train service was decimated over COVID and it still hasn't been put back to the way it should be. We have just three trains. One is completely useless because it deposits you in Carmarthen in the middle of the night. Then the other two are not satisfactory.

⁵ Comments were submitted before 21 April 2022.

Change in passenger needs

9. Participants spoke of the changes in passenger needs and the use of public transport due to the pandemic. The most significant change was perceived to be an increase in car usage.

There's an awful lot of people who re-engaged with their cars and I'm one of them. The car was the safe space and I didn't have to worry about capacity issues, congestion, and people not wearing masks. I was safe in my car and I don't think I'm odd in that respect.

10. Participants agreed that the pandemic has changed people's behaviour. Participants spoke of a decline in the use of public transport due to home working and an increase in active travel.

During the pandemic, people got more active by walking and cycling. That's to be encouraged. The train, in particular, should be more cycle-friendly with provisions for bikes at the station and on the train.

Before the pandemic, I was a daily user and I had a monthly ticket. Now I work from home so I use public transport a lot less.

3. The real and perceived barriers to using Welsh bus and rail services.

Connectivity

11. Participants agreed that connectivity was a substantial barrier for current and new passengers. Participants spoke of geographical constraints, and tight connection times.

North and West Wales

12. Participants agreed that public transport connectivity is a major barrier to using public transport. Participants gave examples of poor connectivity with particular reference to North and West Wales.

Connectivity and integration, for me, are the biggest themes of my decade-plus of living in North Wales. There's a corridor across North Wales, that links from Holyhead, Bangor, Conway, and Chester. And that is reasonably well served for commuters and visitors coming into North Wales on the bus or train. To move beyond that corridor to experience the wider North Wales, whether that be central Snowdonia or the Llyn Peninsula, that is exceptionally difficult, challenging, and time-consuming. I live in Conway and walk to work. But, I am

considering a change of job. I like public transport. I don't particularly like driving and so I'm actually restricting how I look for work to that corridor.

For the working population where I am in Felinheli, we're halfway between two major work centres (If there are such things in North Wales), Bangor and Caernarvon. And we're adequately dealt with in that sense. However, if you wanted to go anywhere else, you would not feel that at all. If you took Anglesey, for example, virtually all routes in Anglesey seem to lead to Bangor, but very little leads to anywhere other than Bangor. That really does affect where people can work and it is wrong to assume that they all work in Bangor.

One of the worst examples of poor connectedness was in December 2019. Great Western started running the new electric trains. It was new and wonderful and it was going faster from Swansea to London. The trouble was they were leaving Swansea seven minutes earlier, but the connections to Pembrokeshire were not connecting to the trains anymore. So you had to wait 55 minutes at Swansea station to get your train. Although the Swansea to London bit was shorter, it was taking you half an hour longer for your overall journey.

I was shocked when I saw what a mess there was at Fishguard Harbour, with the connections with the ferries. It has been embarrassing for all of us who've been involved in public transport to hear about the problems we're having with train and ferry connections in Fishguard. The horror stories that we were listening to. If I was in Stena Ferry management I would have pulled out of the rail sale and just said we're not taking rail passengers anymore because it's too much hassle. If we had a two-hourly train service that would mitigate it to a certain extent because we'd have a train in two hours rather than a train in 12 hours. That might actually help.

- 13.** Several participants from North and West Wales described how the lack of connected public transport impacts their lives.

I live near Bethesda and work in Carnarvon, it's a 20-minute drive to work, but it takes me an hour and a half on the bus. Not being able to get to work in a decent time because of the lack of East to West connectivity makes a commute very difficult.

In North Wales, you can't necessarily cross the valley easily or quickly. I live in Bethesda and work in the North end of the Llanberis valley. To get to work I'd have to go to Bangor first, get a different bus, and then go down the valley rather than being able to go straight across.

If I used public transport I'd have to walk my kids to school, then get the bus into Swansea from where I live, then get the bus out from Swansea to the next town along, and then walk to work. Whereas in the car I can do it in about 20 minutes because there's a road. So, there's no reason why the bus can't go along that road, but it doesn't because it doesn't suit the commercial operators.

In Newport, hardly any buses pass the railway station. The bus that runs along my road goes over the river and then turns left towards Friars Walk towards the bus station. If I want the railway station, the only option I've got is to book the fflecsi bus which has become more challenging recently. Public transport is falling behind the actual needs of its users.

My doctor is the next valley along. I get there by any means other than public transport because to use public transport means a huge loop, involving two or three buses. It would be a day's project to get to the doctors by public transport.

I've got two nurses in the family and they can't even consider using public transport to get to work. And when you think of the size of hospitals like Glangwili or Morriston and you can't get there by public transport to start your shift on time and there's also no service to get you home.

Connection times

14. Participants discussed connection times and the barriers faced when passengers need to switch from one public transport route or mode to another.

One of the big problems is tight connections between different transport systems. Five minutes is not good enough. If anything goes wrong you've missed your connection.

We have a connection coming from say St. David's to Haverford West, it's a 3-minute connection. If you've got a parent with a pram getting off in central Haverford West, they miss the train. If there's a tractor on the route from Saint David's, they miss the train. And the next train is in two hours. You have one of those bad experiences and you won't use the rail unless you have to.

Ferries are also public transport, and the interchange with the ferry in Pembrokeshire is disgraceful. Any people on a late train are stranded for hours, days even. The thing is, the ferry at Fishguard is an international connection because the ferry at Pembroke Dock does not take foot passengers or cyclists, so they can only use Fishguard.

Journey times

- 15.** Participants spoke of poor journey times as a barrier to using public transport, often as a result of poor connectivity and frequency.

Journey time improvements are really needed. If I was to jump in my car to get to Abergavenny from Pembrokeshire it would take me an hour and a half. It takes 3 1/2 hours by train. If I want to go to Cardiff we have the problem of the dogleg in Swansea.

When I have to attend meetings at Cardiff gate occasionally, I drive from Pembrokeshire because public transport takes too long.

- 16.** Some participants described how rail electrification could improve connectivity and journey time

We've got these by-mode trains now that are diesel and electric. We should be wiring to Swansea because it's madness not to do that. There's a 50 mile an hour speed limit on the M4 because of pollution through Port Talbot, the railway line is running alongside it is diesel. It makes a mockery Welsh Government when they say they're trying to clean up the air by putting a speed limit on the motorway when the logical thing for them to do is put wires above the rail.

You could then use those by-modes to run a London, Cardiff, to Carmarthen service avoiding Swansea and combining with a load of five trains from Swansea coming up to Cardiff and you could run about five or six trains through to Carmarthen. Then Carmarthen becomes a railhead and you've got a chance of doing something about people then using more local trains in West Wales. Then we should be aiming for 15 to 20-minute connections between buses and trains, not five minutes.

Frequency

- 17.** Participants felt that a more frequent public transport service running to a headway (e.g. every 20 minutes) as opposed to being scheduled for any specific time of the day would be a key tool in removing barriers to using public transport.

If you could walk up to a bus stop or platform and know that a bus or train was arriving in a few minutes, then more people would use public transport. Travel companies will see their patronage and revenue increase. One of my local lines from Chester into Liverpool was a 30-minute frequency. Most people thought it was not bad. But when they increased it to every 15 minutes, business shot up and it ended up paying for itself. If you put on a good service people will use it.

The frequency of the bus or train is a barrier. When I lived in Amsterdam, the train, the tram, and buses arrive every seven and half minutes. There is no need for a timetable, everyone knows that there will be another vehicle in seven and a half minutes, regardless. In May 2021, the Dutch Railways launched the timetable-less line between Amsterdam and Maastricht, which guarantees on average a seven and a half minute wait for the train. In 2021 the Dutch Railways made a £1.3 billion loss. But in 2022 it was even, and in 2023 it will be profitable. The Dutch Traffic Department has confirmed, that this has reduced traffic jams by 10%. And that's enough to keep it running

Between Haverfordwest and the Penblwyn Roundabout, 600 vehicles passed in an hour in one direction and 500 in the other. You'd think with that number of vehicles you'd be able to fill an extra train to make the trains every hour rather than every two. That is something that would do very well for that main route through Pembrokeshire, to have a train every hour rather than every two.

- 18.** Participants also illustrated the problems faced with a lack of evening services.

The availability of services after a certain time is a very big barrier. A lot of transport services seem to be geared to nine to five, whereas it's not really nine to five that needs to be looked at. The whole day needs to be looked at, say from 7:00 AM through till 10:00 PM. That's one of the issues that have come across in my work with GIG Buddies and Learning Disabilities Wales.

I stopped using the buses, in the end. For me, it was the problem with the last bus home. I live in Anglesey and the last bus was quite early. So that was a factor especially when I worked late.

Capacity

- 19.** Participants agreed that rail providers did not always provide enough capacity for the expected number of passengers. Participants spoke of the overcrowded valley trains and also of capacity issues in North Wales.

There's insufficient capacity on the North Wales coast. It's a strange service because you have Avanti West Coast running along there with nine coach trains and then the next service could be a two-car Transport for Wales service. It's a massive variation in the capacity that the operators are providing. People will turn up expecting to see lots of seats and space on a train and then they end up standing all the way to Chester or even beyond if it's that bad.

In my memory, over the past few decades, the train from Chester, or occasionally Crew, to North Wales has always been ridiculously overcrowded.

Service disruptions

20. Participants felt that service reliability is one of the most important aspects of public transport and when passengers experience service disruptions and cancellations they are more likely not to return to public transport.

One or two trains to Milford Haven from Manchester had been cancelled. Apparently, the train left Manchester in the morning got as far as Crew and was cancelled because there were too many passengers. This was rugby day in Cardiff. What do you expect?

We've experienced a particular problem with the Conway Valley line that was out of action for the best part of two years pre-covid because of severe flooding and remedial works. But then faced with the very sudden withdrawal of rail units as they wanted them elsewhere. If there's a shortage of units elsewhere in the system, the Conway Valley units are the first to be taken away, even if it's because they need extra units because there's a rugby game on in Cardiff. We need the certainty that the service is going to run.

Reliability is an issue. The cancellations we're seeing. Mitigating cancellations to a rail replacement bus doesn't cut it at all. If people are travelling by train, they want the train!

21. Participants agreed that a better response to delays and cancellations is needed by providing passengers with real-time, integrated information across all available platforms, from online to station announcements.

On the valleys lines, there are a lot of replacement bus services and it's hard to get information on them. It's not always clear where they pick up and leave from. I've been caught out before because I didn't know where the bus replacement service was leaving from. Some stations are worse than others, Pontypridd and Treforest are not very good for signage. If there's a bus replacement service, or I'm just sick of Transport for Wales, I'll just jump in the car, but not everybody can do that.

When things go wrong we need to get better at communicating with passengers. It is partly the unexpected delay and lack of information that people find so frustrating and worrying, just not knowing when you're going to complete your journey. An experience like that puts people off using public transport. They think 'I'm not going to do that again'.

It seems that trains can be cancelled and rescheduled and the expectation is on you to have a mobile phone, that can get you onto the network, to find out what the latest position is. It's your problem if you can't.

My daughter bought tickets to see the Wales football game. They bought their advanced purchase tickets to take the children. She's just checked online to find that the line between Shrewsbury and Cardiff is shut. The signalling box is closed at Hereford. Advance tickets are non-refundable so she will now be put on a bus. But she has two children who can't travel by bus. These uncertainties are major for them, this is an outing they've planned for months. If you go on the Transport for Wales website it just says the line's shut. It doesn't say when it's going to reopen. People need information readily available to make decisions because they will end up jumping in the car.

Accessibility

22. Several participants with accessibility needs described the barriers they face when trying to access public transport.

Bus drivers in Llandudno do a good job to a degree but you have to remind them to help people. The buses have manual ramps to help people like me, who use a wheelchair, to get aboard. But a lot of the time you have to ask the driver to help, you have to keep them on their toes! Sometimes I have to complain to Arriva about the lack of support.

If you have mobility issues and you want to use the train you need to know if the train station is accessible, if there is step-free access, and if your pre-booked support to get onto the train from the platform will actually be available, or will it be cancelled at the last minute with no notice? You also need to know if the staff at the train station know how to support you if you have learning disabilities and don't understand the announcements

23. All participants agreed that making public transport accessible for everyone would remove significant barriers.

No matter where you live in Wales, whether that be in urban or rural areas, whether you are really well connected or more disconnected, there are always issues around physical accessibility for people who've got mobility support needs. If you're a wheelchair or walking frame user you want to know that the bus is going to have space for you, that the bus driver is trained in using the ramp, that the bus driver is confident about getting you on the bus, and that you can get to your seat before they drive off.

If we were able to work together to create a public transport system that worked for disabled people, older people, or people with learning disabilities, it would then automatically work for everybody else. Because, if you're meeting the needs of the most disadvantaged person by making the ticket accessible and integrated, by making the physical infrastructure accessible and easy to use, by making the information easy to read and understand, and by giving people the

option of different languages, then everybody is going to benefit. It will be accessible to all.

First and last-mile

24. Many participants described the difficulties faced in getting from their front door to the bus stop or train station, and then from the final bus stop or train station to their final destination.

I can walk to the station, which takes just over an hour to walk the three miles. It's fine if it's a nice day, but probably not otherwise. And it's not the kind of thing that everyone would attempt as the journey back is uphill and takes more energy than the journey down.

The last mile is a barrier. When I get to my destination, how do I get from the station to the place I want to go to? Now I can do a lot of this myself on the web, but lots of people out there don't have that luxury at all.

25. Participants agreed that integrated solutions were needed to ensure the continuity of a door-to-door journey.

In a rural area like Pembrokeshire, is not sensible to have a bus connecting with every train. That is what my car should do, but in general, I should not drive further than my nearest station.

We need to integrate cycling with using the bus. Just by making it possible to put your bike on the bus would mean more people would use the bus. Especially around Snowdonia, because people would really enjoy cycling in the National Park and cycling part of the journey and then being able to take the bus when they need to.

Demand-responsive travel

26. Many participants spoke of demand-responsive travel as part of the solution to the real and perceived barriers to public transport. Participants felt that the fflecsi bus was a good service but recognised some barriers when accessing the service.

The fflecsi service has worked really well for people who are younger, more social media savvy, and more connected. But for older people who are used to a timetabled service, that would run at particular fixed times, that's presented a significant barrier and we've seen that a lot of people have stopped using the public transport network as a result.

It's demand-responsive. So for somebody who wants to be picked up within the next two hours, it works really well. But for somebody who knows that they've got an appointment in ten days and they need to book their journey now so that they're confident that they will be able to make that appointment, it doesn't really work for those people.

- 27.** Some participants spoke of their experience with community transport, particularly in relation to how the service has broken down barriers experienced with public transport

A lot of people have chosen to shift to using community transport probably earlier than they would have done before because they don't feel are safe using mainstream public transport, they don't feel like it's as accessible to them as it used to be. There might be a perceived difference in terms of both the cleanliness of the vehicle, the way that the service is operated, and the support that person can access when they use community transport.

Information

- 28.** Participants discussed the coordination and dissemination of public transport information. Participants felt that travel information was often unreliable, incorrect, and contradictory.

Communication of travel information is not consistent. There have been instances where the website has said one thing, the train indicator boards on the station have said another thing, and a specialist rail user real-time website has shown that neither of those has been true.

- 29.** Participants agreed that the lack of real-time, accurate travel information was a barrier.

Communication from public transport providers, by the rail industry in particular, when things don't work has got to get a lot better. We're in the dark ages with it. Recently, I looked on Realtime trains before I left the house and it told me the train was going to be 10 minutes late. I turned up at the station to find the train was on time and I'd missed it. I contacted Arriva about it and they said, 'Oh yeah, but the person who updates the information goes home at 5:00 o'clock'.

Young people, particularly, live on their phones. And everybody lives with real-time information, all of the time. You can use your phone to access real-time information. You should be able to find out if there's a bus in the next 20 minutes, but that's not real-time information about where the bus is. I would have thought in today's world that would be possible. Certainly, in my work, I get far too much real-time information, about everything. I could tell you where my driver is for my sofa delivery to the nearest postcode.

- 30.** Participants also described difficulties in accessing information online.
-

The Transport for Wales website is difficult to use. You really have to know your way about the website. I have average IT skills, I'm not an expert but I'm not pathetic at it either. But when I try to find out when a train is running or not running the website is very difficult to navigate. So if you're not very confident with IT you'll struggle, and if you try it once and it doesn't work you lose faith in it very quickly.

You've got to remember that people, especially in rural areas, who do not have all these fancy phones really depend on old-fashioned communications.

- 31.** Participants also considered the difficulties faced by people with additional needs when accessing information.

In terms of people with disabilities, physical, sensory, and hidden disabilities. It can be an incredible challenge for somebody to pluck up the courage to say, OK, I'm going to go and get the bus or the train. Getting information and the reliability of services are factors as to why people with disabilities struggled to get out and about. There isn't enough information or it isn't easy to find.

Some bus stops don't have timetables which makes it difficult to know when your bus is supposed to arrive. Arriva customer service isn't very good either. It makes it impossible sometimes to know how to plan my journey and how to get around. As a wheelchair user, it's very important that I can plan my journey in advance.

Timetables

- 32.** Participants appreciated the planning involved in setting out a public transport timetable. However, accessing reliable bus and rail timetable information was seen by participants as a barrier for many.

Timetables are changed too frequently. The timetable in Snowdonia has been changed fundamentally three times in the last 12 months. You go to the bus stop and find out that it has just gone and you have to wait an hour or so.

- 33.** Participants agreed that navigating the online timetable systems could be a barrier to new or returning passengers, people who struggle to use the internet, and people with learning difficulties, for example.

Getting travel information digitally is not easy for everyone, often the vulnerable and elderly are excluded from being able to access solutions that they might really need.

- 34.** The majority of participants felt that the paper timetable should be reintroduced.

There's one very old-fashioned thing which we no longer have, and that is the printed timetable. It was a very useful thing to have in your pocket. I took that one up with a councillor. His point of view was that they had to look for cost savings and that anybody who uses the bus service 'should know their route anyway'.

Post-covid they need to move back to printed material both in the book format and also at bus stops. It doesn't necessarily have to be paper form at bus stops. There are now systems available that can display the information electronically. Information about services and fares can be provided far better in the future, but it shouldn't just be online only.

Ticketing and fares

35. Participants discussed ticketing in relation to affordability and pricing inconsistencies.

One of the barriers is the affordability of rail. We've just had yet another increase in rail fares. From Cardiff to London, the trains going through Newport station are so lightly loaded that it's disappointing, frustrating, and annoying. People are being priced off these services. I appreciate that as they get nearer London, passenger numbers increase. Then the first off-peak train from Swansea is far busier because that's the one you can use the cheaper off-peak fares on. Rail operators need to address affordability

People are getting concerned about affording to pay for food, heating, and transport. What is that going to mean in terms of people's health deteriorating because people do not go to the absolutely essential appointments?

A colleague who's based in Monmouthshire has to pay £8.00 for a day ticket on the bus, in the Cardiff Capital Region. I'm earning good money, but that is expensive for me. £8.00 for a day's travel and you're only able to use one mode of transport.

36. Participants highlighted unfair pricing of tickets whereby similar length journeys can differ greatly in price.

In West Wales, we suffer quite a lot in comparison with the cost per mile. I compared the costs from Clynderwen to Carmarthen, which is 20 miles. When you compare 20 miles from Cardiff to Merthyr, I'm paying 3 three times as much. I think that's a barrier to public transport use in West Wales.

Integrated Ticketing

37. Participants all agreed that the lack of integrated multi-modal tickets for public transport services was a significant barrier to users and non-users.

Ticket integration is a big thing, tickets must be multi-modal which entitles you to travel on any operator within the region so that you have a seamless step-free transition from train to bus, or bus to bus, and so on.

Integrated ticketing. It's a fairly simple idea, but with all the different transport providers, tickets aren't integrated at all. When I used to commute I would try not to get the bus after my rail journey as it was another ticket and another expense.

Some people have booked tickets from Chester to North Wales where the small print says not valid on Avanti services. The Avanti conductor then explains they either have to get off or buy another ticket. Three weeks ago I saw two separate individuals be told by an assertive conductor that they had to get off the train. The conductor relented in the end. But if you buy a ticket it should be valid on any reasonable service on any reasonable route.

38. Participants suggested several ticketing models.

I used to live in Berlin which had a very good public transport system. Passengers could purchase a single integrated ticket, with which they can travel on and change to various means of transport, from the place of departure to the place of arrival.

In Germany, you load up your ticket with trips. It doesn't matter if you use all of your trips in a week, month, or year. Your ticket is usage-based rather than time-based which allows you not to have to think about the different costs but is flexible and works around your needs and ad hoc working routine. For example next week I might only need to go in once and the week after I might need to go in three times. Buying a weekly ticket would be a waste of money, but buying a single would be expensive. Whereas an integrated ticket with paid trips would suit me and be cost-effective.

Infrastructure-related design

39. When considering the barriers to using public transport, participants identified issues related to infrastructure-related design.

Decisions are made about where facilities, shops, and developments are going to be built. Those decisions must be linked to transport provision. It's a chicken and egg question, but it needs to be understood and thought about.

There is a decision going on at the moment about where to cite the new West Wales Hospital. It could be somewhere between Narberth and St Clair's. But will it be near the railway? Will it be near the road? Is the plan to build the hospital just working on the amount of money it will spend or the amount of money I will spend getting there and the convenience to me?

There are a lot of new housing developments being built that are not suitable for public transport. Estates with very winding roads which are great if you've got a car, but you try taking a full-size bus down there, you're not getting it down there. Policy needs to be in place to make sure that these housing developments are centred around public transport hubs.

40. Some participants felt that car parking within cities and towns was counterproductive.

Car parking is something that should be on the periphery of a city or town. It shouldn't be right in the centre, that should be for buses, cyclists, and pedestrians.

Competing with the car

There's been too much of a mindset over the years that the trains are in competition with buses. No, they're not. Buses and trains together are in competition with the private car. Until we get that mindset sorted we're getting nowhere.

41. Participants agreed that substantial changes are needed if public transport is to compete with the private car.

There is always the choice to take the car. You've got to make public transport better than the car. The fuel duty, the greenness, yes, we've all got that in our heads. But at the end of the day, if the alternative is worse than the car people won't use it. You can play the green card for as long as you like, but people will revert to the car.

It's got to be that the trains or the buses make themselves more attractive. We have to change the product.

42. Participants felt that public transport has to beat the car on cost, as this is the only area in which public transport can win.

I recently went on holiday and caught the train to the airport. For both me and my partner, an open return from Cardiff Central to Bristol airport was £55. We had bags with us, so we also had a taxi from the house to the station, which was an additional £7. I was expecting it to be cheaper. For convenience, I should have done that journey in the car and paid for airport parking. If I'd left the car at the airport it would have been a bit cheaper and much more convenient.

Public transport will never be more convenient than a car so it has to beat it on cost, if it doesn't beat it on cost it becomes harder to make a justification to leave the car and get on the train. Especially with the extra effort, it takes to get to the

station from your house and that sometimes you have to run to catch your connecting train as there might only be minutes between them.

The cost of the car and taxation of travel should be based on use rather than ownership. A car is doing nobody any harm when it's parked in the garage or on a driveway and not being used. Why not tax mileage when the car is MOT'd?

Public perception

43. Participants felt that there were several components to the issue of public perception and that developing a positive public perception is key to breaking down barriers.

People's perception of public transport in terms of its convenience, cost, and all those long-standing issues are more of a factor than fear of the pandemic. It's those topics that are the main constraint, rather than 'I might get COVID'.

The idea of having a very clean, easy-to-use, and fast option for public transport is what we want. Because I'd say that the general perception is the opposite, dirty, slow, and not easy to use.

Public perception of buses

44. Participants agreed that the general public has a negative perception of bus travel.

I remember talking to a colleague who was discussing ways in which she could get to work, when I asked if there was a convenient bus service she recoiled in horror and said 'I would never use the bus!'. There's that perception. Unfortunately, travelling by bus is seen as the option for people who can't afford anything else.

45. Participants felt that perceived perceptions included poor cleanliness, unreliable service, unnecessarily long journeys, unsafe environment (particularly at night), and that bus travel is predominantly used by people on low incomes.

Buses are not well-liked and looked down on a little bit. I used to work for the council and I would catch a bus to a meeting colleagues would judge me for using the bus. I never saw anyone else travel to those meetings by bus.

Public perception of trains

46. Participants felt that trains had a more positive public perception. Some participants felt that the public enjoys train journeys and perceives the service to be fast, clean, and accessible.

I don't think rail has an image problem in the same way that buses do. The idea of being stuck in traffic or on a bus is so unappealing. But even in rush hour I can sit down, and listen to a podcast on a clean train. I enjoy the walk to the station and I think of my rail commute as me time. Whereas that wouldn't be the case in a car or on a bus.

- 47.** However, participants also agreed that negative public perception centred on travel costs, delays, cancellations, and stereotypes.

The railway's brand awareness is probably still in stale sandwiches, unpunctuality, and overcrowding. Surveys at Tesco Milford Haven have revealed that people think that there are only about half as many trains as there are, that they all just go to Carmarthen, and cost twice as much to travel on as they do.

Understanding the post-Covid passenger

- 48.** Most participants agreed understanding the passenger is key to overcoming barriers and developing an efficient transport service.

You've got to go back to basics and identify the market to address the market, and so we've got to know where people want to go, not where the train planners want these trains to go. We've got to identify the hotspots and the events. And not just Cardiff rugby. We've really got to go back to basics, identify the market and address that market.

The economy in North Wales is driven largely by the leisure and tourist economy. So there's a need to transport people in and out of North Wales for the day. We're not going to get many people from Cardiff travelling up to North Wales for the day to go to the beach, especially with an eight hour round trip on the train.

- 49.** Some participants suggested that changes to public transport needed to consider those who currently use the transport system and have no other means of transport to use.

We need to be mindful of the people that are already using the public transport system. It might not be a perfect system, but it is a system that they understand. We need to take those people with us and not disenfranchise them even further by thinking about getting more commuters out of their cars and redesigning the bus service to make it a really attractive and sexy service for people who are currently using their private vehicles. What will happen to people who now can't get to their relatives to support with caring responsibilities? To make sure that their loved one has had a wash and had breakfast in the morning? What happens when the bus isn't running there anymore as it's not a commuter or leisure route? Or the app isn't going to allow them to have a pick-up because it's already full of people who are going to work?

Seasonal demand

50. Participants from the North and West of Wales spoke about the seasonality of the public transport demand on the existing system, particularly in light of the pandemic.

This phenomenon of 0 visitors to manic excessive numbers of visitors at the drop of a hat is an issue. It seemed that half of Liverpool and half of Manchester came to North Wales before you could say Johnny Bach and in every area around Anglesey. The beaches were absolutely chock-a-block. So the solution has to go to all tourist areas in Wales.

We saw that in Pembrokeshire we had one of the busiest years for decades. Yet the train service and public transport setup were abysmal.

A key change is the use of social media such as Instagram, to draw attention to particular locations. For the first time, this has directly driven transport and visitor pressures at locations that previously didn't have that. People were making somewhere popular by posting about it on social media. That's created a demand for parking and transport in areas that have had a sudden spike in visitors. It's only during the pandemic that this has become obvious as an on-the-ground rapid change. This is a challenge in the flexibility and design of the transport system to adapt.

51. Participants recognised the problem of providing an effective public transport system that serves both residents and visitors.

One of the big challenges here in Snowdonia is how to address both the needs of visitors and local communities. We can picture a future with a really good infrastructure for our visitors, but if we haven't matched that with what's needed for the people in our the communities, who need to get to the medical centre or their place of work, then we haven't solved the problem.

52. Participants living in Welsh tourist areas felt that a key objective is to optimise and improve public transport for residents and visitors so that the car is left at home.

We need to make it very, very easy for the hundreds of thousands of visitors to use public transport. And make it difficult for them to use their cars because the cars and the number of people are going to eventually have an irreversibly negative impact, and we're already on the way there.

Visitors to North Wales predominantly come from Northern England. Many of them are day visitors. They never even think about using public transport, the knee jerk reaction is to get to North Wales by car. Once those cars are in North

Wales there is a mindset that doesn't even think in terms of using public transport, it's just not on.

53. Participants suggested that visitor traffic needed to be intercepted to channel the visitors from the car onto public transport,.

Intercepting the large amounts of visitors arriving by car to Welsh tourist areas is key. We must intercept that traffic in a way that links to our transport system.

54. Participants also suggested that visitors lack local public transport knowledge and that more should be done to promote public transport options.

The new T10 bus service is very welcome. But we are concerned that so few people seem to use it compared to the large number of cars parked along its route. There are concerns that visitors are unaware of this service. It's a marvellous service which is actually so good that my trepidation is that having seen so few people on it, it may not last as long as it should. I've never seen more than six people on it

I still see hundreds of cars parked around, with full car parks. Visitors haven't even heard of that bus app. Visitors know about some of the public transport options available, but I don't think there's much knowledge among visitors about any other routes.

4. How to address the barriers to using Welsh bus and rail services and increase public transport use

Participants identified some ideas that they felt would support improvements to the Welsh bus and rail services.

- 1. Integrated ticketing** to provide passengers with transferability across different modes, operators, and geographies.
- 2. Flexible ticketing** to enable passengers to block buy trips to take when they want.
- 3. Real-time integrated travel information** across all available platforms, from online to station announcements, from one information provider.
- 4. Sensible connection times** between modes of transport to give enough time for all passengers to successfully board their connection.

- 5. Public transport to run to a headway** (time between vehicles) as opposed to being scheduled for any specific time of the day.
- 6. Provision to transport bicycles** on public transport
- 7. The reintroduction of paper timetables**
- 8. Integration of transport policy** with other policies affecting land use planning or infrastructure-related investments, such as hospitals and housing developments.
- 9. Improve Newport to Pembrokeshire rail services** by:
 - a. addressing the 'dogleg' in Swansea;
 - b. completing the electrification of the South Wales mainline;
 - c. developing Carmarthen as a railhead to provide more frequent trains across West Wales; and
 - d. a two-hourly service to Fishguard.
- 10. Improve public transport services in North Wales** by:
 - a. developing routes beyond the main transport corridor of Holyhead, Bangor, Conway, and Chester;
 - b. developing East to West public transport routes, connectivity, and frequency;
 - c. reopening the Bangor to Caernarvon railway line; and
 - d. intercepting and directing day visitor traffic to a public transport interchange where visitors continue on their journey using public transport.

Stakeholder event on bus and rail services – 17 March 2022

March 2022

Introduction

1. In January 2022, the Committee published its priorities for the Sixth Senedd. They included the future of public transport and recovery of services post-Covid. The Committee held a stakeholder event on 17 March 2022 as part of the evidence gathering for that work.
2. The session aimed to understand stakeholders' views on the effectiveness of bus and rail services, their future purpose, barriers to the public in using them, and perspectives on the effectiveness of Welsh and UK Government policy. Twenty stakeholders covering several areas of interest, including passenger representative groups from across Wales, attended the event.
3. This document summarises the issues raised with the Committee during the event.

Issues raised with the Committee

Public transport strategy

4. Many contributors said the Covid-19 pandemic had fundamentally altered people's day-to-day lives, and public transport needs to adapt to this. For example, the need for capacity to meet the demand to commute to the workplace for a specific time may change with increases in flexible working.
5. Several stakeholders recognised that public transport usage is related to the quality of the offer - the better the provision, the more it is used. Inevitably, a degree of risk will be associated with the type of investment needed to secure increases in usage.
6. Stakeholders expressed support for Llwybr Newydd, but they were concerned about the capacity to deliver the strategy. They added that too many regional initiatives are not currently



aligned – the metro projects, the Burns reforms, and reforms in Local Authorities. However, there is insufficient resource to support delivery, particularly among local authorities.

- 7.** It was suggested that there should be an increased focus on regional transport planning to deliver Llwybr Newydd. Regional transport bodies should be taking the lead across all modes.
- 8.** Several stakeholders emphasised the need for progress following the Burns report on the M4, to demonstrate that improvements are being delivered.
- 9.** Some contributors strongly supported the devolution of all responsibility for rail to Wales.
- 10.** There were some positive comments about the willingness of TfW to engage with stakeholders, including having open, constructive conversations and piloting work in partnership to improve services. However, more passenger involvement is needed to help plan and shape services at local and strategic levels.

Funding

- 11.** Several contributors emphasised the need for adequate funding for bus and rail services. One stakeholder suggested that revenue funding is a bottleneck to the necessary improvements.
- 12.** Some stakeholders referred to what they felt was a historic underfunding of Welsh rail infrastructure by successive UK governments.
- 13.** Stakeholders suggested that community transport should be supported to improve and update their fleet and the service they can provide.

Affordability of services

- 14.** For many, the affordability of bus and rail travel was a key issue. Addressing this could lead to significant increases in passenger numbers. This was particularly the case with the cost-of-living crisis. Some contributors felt that public transport should be free at the point of use as it is a public good.
- 15.** Alongside this, there were calls for a simplification of fare structures. Several contributors referred to examples of good practice, including the Bws ticket in north Wales and the My Travel Pass for young people.

Technology

16. There was broad support for the prevalence of technology in relation to bus and rail travel, including real-time travel information and ticket booking via apps. However, others recognised that the technology is not accessible to all, so it must be part of a suite of approaches. Some contributors suggested there needs to be better access to travel information onboard buses and trains and at interchanges.

Access to services

17. There were concerns that bus and rail services are not accessible to all. Apart from the location of stations or stops and their physical accessibility, it is often difficult to access information about travel times or delays.

18. Some contributors expressed concern that active travel policies are only relevant to physically fit and able people and, therefore, are not as inclusive as they should be.

19. Accessing services in rural areas continues to be a concern. There was also concern that areas with already-limited services would suffer twofold from any further reductions in service provision resulting from the Covid pandemic.

20. Timetables need to reflect users' needs and connect communities.

People with disabilities

21. Several contributors were concerned about poor accessibility to bus and train services for people with disabilities. There were calls for step-free access at all stations, ramp access on all buses, sufficient space on trains and buses for wheelchairs, and adequate provision for people who are blind or deaf.

22. Some disabled people might experience a lack of confidence after the pandemic. This might be addressed by travel training for such passengers and disability equality training for all transport staff.

Community transport

23. There was considerable support for the services provided by community transport. One stakeholder emphasised that it is an important option for all and "not just for older people."

24. There were calls for more funding and visible support to allow the community transport sector to fulfil its potential as an equal partner in the transport mix, working alongside communities and other transport modes. There was also a suggestion that more community transport opportunities should be encouraged, particularly in rural areas.

25. One stakeholder said there had been positive engagement from certain local authorities and health boards in parts of Wales where community transport is valued and invested in as a key part of the transport network. However, this was not consistent across Wales.

Reliable services

26. For many, restoring user confidence in bus and rail services will be vital after the pandemic. One way to achieve this is by providing a more reliable service. This is necessary if there is a policy ambition for people to use public transport rather than cars in their daily lives. As one contributor pointed out, unreliable connections can have serious implications for users who are dependent on public transport - "one or two late journeys can mean unemployment."

Infrastructure

27. Linked to the issues of accessibility and reliability was infrastructure. There is a need to ensure that the right infrastructure is in place first so that services can be layered on top. There is a need to tackle congestion and provide buses with priority measures – this will result in more reliable journey times and encourage more people to use services.

Integration of services

28. The better integration of public transport services (buses, rail, and taxis) was a major issue for most contributors. The three key areas that would lead to better integration were: ticketing, timetabling, and proximity of infrastructure.

29. Several contributors pointed to examples of good practice in relation to ticketing, such as the Bws ticket in North Wales and the Young Person's Pass. There was a view that ticketing should be simplified and that integrated ticketing across bus and rail services is vital.

30. Bus and rail timetables should be aligned so that passengers can switch between modes without long waits for a connection. There was an acknowledgement that scheduling would be challenging across more than one mode. A 15-minute wait for a connecting train might feel too long for some passengers, with shorter times meaning an increased risk of missing their connection.

31. Better integration also means locating bus and rail stations nearer to each other. That would make it more convenient for the passenger to switch between different modes of transport.

32. Contributors suggested that there should also be better integration with other forms of active travel, such as walking and cycling. One suggestion heard by the Committee was that

buses should be more able to carry bicycles. These linkages should form the bedrock of the public transport system and need more work.

33. Better integration should also be pursued between different operators. For example, for passengers at Newport when changing to get to Bristol and beyond.

Behavioural change

34. Behavioural change was, as expected, a key issue. Contributors acknowledged that behavioural change is not something that happens on its own. Instead, it comes about because services have improved. Accessibility, affordability, and reliability should be the initial focus. The public transport network and infrastructure are not currently suitable to respond to a significant shift away from car use. Many people who would potentially like to shift to using more public transport are not able to currently because of the deficiencies of services.

35. There was also support for measures to remove incentives for car use among the general population. There is a balance to be struck between incentivising public transport and disincentivising car use. There was an acceptance that some people will continue to need to use a car e.g. for health or mobility reasons. They will need access to facilities such as parking spaces.

Staffing

36. Several contributors talked about rail and bus staff and complimented the service provided. Staff were described as a valuable resource, and their feedback about the services should be listened to and valued. The significant role that staff play in ensuring the safety of passengers was emphasised, including being a reassuring face for passengers in need.

37. Passenger safety was an issue raised by many, particularly for women on buses and trains. They referred to buses and trains being full on days when large-scale sporting events take place.

38. There was concern about the need to ensure that problems with recruitment are addressed, particularly the need to bring younger bus drivers into the industry. It was suggested that bus driver qualifications could be offered through local colleges and should include customer service training alongside driver training.

Pwyllgor Newid Hinsawdd, yr Amgylchedd a Seilwaith /
Climate Change, Environment and Infrastructure Committee
Teithio ar fysiau a'r rheilffordd yng Nghymru / Bus and rail transport in Wales
BRT05

Ymateb gan Mark Barry, Athro Ymarfer Cysylltedd - Ysgol Daearyddiaeth a
Chynllunio, Prifysgol Caerdydd/
Evidence from Mark Barry, Professor of Practice in Connectivity - School of
Geography and Planning, Cardiff University

Submission to Senedd Climate Change, Environment & Infrastructure Committee – *this is an update of my Sep 2021 submission*

May 15th, 2022, **DRAFT 1.0**

Mark Barry, Professor of Practice in Connectivity at Cardiff University's School of Geography & Planning

To note: the views and opinions expressed in this paper are those of Mark Barry and no other person or organisation.

Thank you for inviting me to present evidence to the Senedd Climate Change, Environment and Infrastructure Committee. As many of you know, I have been involved in Transport Policy and Development in Wales since 2010, much of that related to the South Wales Metro. I have included a summary of my roles, articles and publications at the end of this submission.

Before I start, can I offer a brief *postscript* which I have recently shared in similar form, with senior public officials over the last few months.

I am sure most of you will be aware of the UN IPCC 6th Assessment Report on Climate Change Mitigationⁱ: [Climate Change 2022: Mitigation of Climate Change \(ipcc.ch\)](https://www.ipcc.ch/). A press summary was also preparedⁱⁱ: [WGII Summary for Policymakers Headline Statements \(ipcc.ch\)](https://www.ipcc.ch/)

Frankly the house is on fire, and we have to act...

So, I am perplexed, why, like Covid, we don't have a daily press conference from Ministers at Westminster and the Senedd, setting out the status and plans/progress to address the Climate Emergency....which is an order of magnitude at least more urgent than Covid.

I know Net Zero Wales does not go far enough, I know we need to do more, I know discussions and arguments about economic growth are arbitrary and secondary to the real issue at hand. We have to make some deep and meaningful changes on tax, mobility, our economy, food, energy, etc and we have to start now; not in 2 years, not after a future Regional Transport Plan, or the next "relevant" election. I am getting older and care less about process and sensibilities and more about the legacy of our generation and the kind of planet we will bequeath our children. It is also clear to me that those with the most need to make the biggest changes.

Clearly here in Wales we can't turn the dial globally on carbon emissions; but we can show others what it is possible to achieve? All of us in senior positions can influence political discourse, policy and actions.

So, please can we stop, briefly, and thinkthen we have to stop talking and start doing.

Summary...

Firstly, my apologies, I haven't had time to prepare a comprehensive submission and have just updated and augmented my submission to this committee from Autumn 2021. Also, to note, any discussion re decarbonisation and transport can't just be about bus and rail, so I am going to summarise for me, the key issues re: transport, planning, car use, demand management etc, we need to address (inc. reference to some of my on-line articles and publications which themselves include references to source data/material).

As context in Wales, we have to acknowledge that Welsh Government has set out, via [Llwybr Newydd](#)ⁱⁱⁱ (The Wales Transport Strategy) ambitious targets for mode shift away from car by 2040, and more ambitious 50% reduction in surface transport emissions by 2030 which reflects the advice of the Climate Change Committee to UK Governments^{iv}. This has

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been re-enforced in [Net Zero Wales](#)^v and will be reflected in the upcoming National Transport Delivery Plan which will present a more detailed plan for Llwybr Newydd.

From all the work I have seen (formal & informal) from a number of organisations, and noting much fine grain detail, I think we will need, by the mid 2030s:

- A 30-40% reduction in car use (even when accounting for DfT projections for EV use)
- At least a doubling of Public Transport (PT) and Active Travel (AT); in that context the importance of [Welsh Government Metro programmes](#)^{vi} cannot be understated. Their ongoing development and implementation is essential. *I prepared a brief summary/overview [here](#)^{vii}.* The capital and operational funding challenges and the role/responsibility of UK Gov in any solution have to be addressed as well as the need for Bus Reform in Wales.
- In all this, and again re-enforced though all the work/discussion I have had, there is no getting away from the need for Demand Management to help reduce car use/dependency. The evidence is clear, you can build the public transport (PT) capacity, but you need “incentives” and disincentives” to encourage people to use it. This will inevitably include road pricing measures – or a reduction in the “car/road use discount” as I prefer to call it (*We have to look at removing “free” parking as well*)
- The reduction of fuel duty tax revenue will also force HM Treasury to consider such measures before too long as [the Westminster Transport Committee found in its report on Road Pricing](#)^{viii} earlier this year. Wales should perhaps be on the front foot in this regard to secure its own “revenue stream” as, as recent evidence shows, one can't rely on UK Government to invest in Welsh Transport infrastructure even when they are responsible for it. I repeated this case in my submission to Welsh Affairs Select Committee (WASC) – [and summarised here](#) and earlier this year in my [formal response](#)^x to the Great British Railways consultation on their Whole Industry Plan (WISP). The non-devolved status of Wales' rail network and the open sore of HS2 being designated by HM Treasury as an England and Wales project for Barnett^x purposes are material constraints on what WG can achieve.
- Our planning and land use ecosystem needs a radical overhaul in the context of Transit Oriented Development to enable us to make “better decisions” and to bring forward more sustainable development.

Basic Physics and Geometry of Cars Vs Public Transport

To help with context I think it might help to share some basis [transport planning principles](#)^{xi}. *I originally set these out in an article earlier this year.* As illustrated in *Figure 1* it is operationally more efficient to move 1000 people an hour between two points in 2 or 3 trains (of 300~500 people) or 4 Light Rail Vehicles (of 200~400 people) instead of 14 or 15 buses (of 50~75 people). At 100~200 an hour then perhaps 3 or 4 buses works better than one train, remembering that a frequency of 4 services an hour is generally regarded as the minimum required to deliver a “turn up and go” services able to attract most passengers.

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In densely populated urban areas, it is always more efficient to move large numbers of people in fewer bigger vehicles, so trying to move 1000 people an hour in 500~1000 cars is always the least efficient and most environmentally damaging. Autonomous and/or electric vehicles or “pods” can't change the basic physics and geometry of the question – primarily road space required per passenger and energy costs per passenger. *Figure 2*

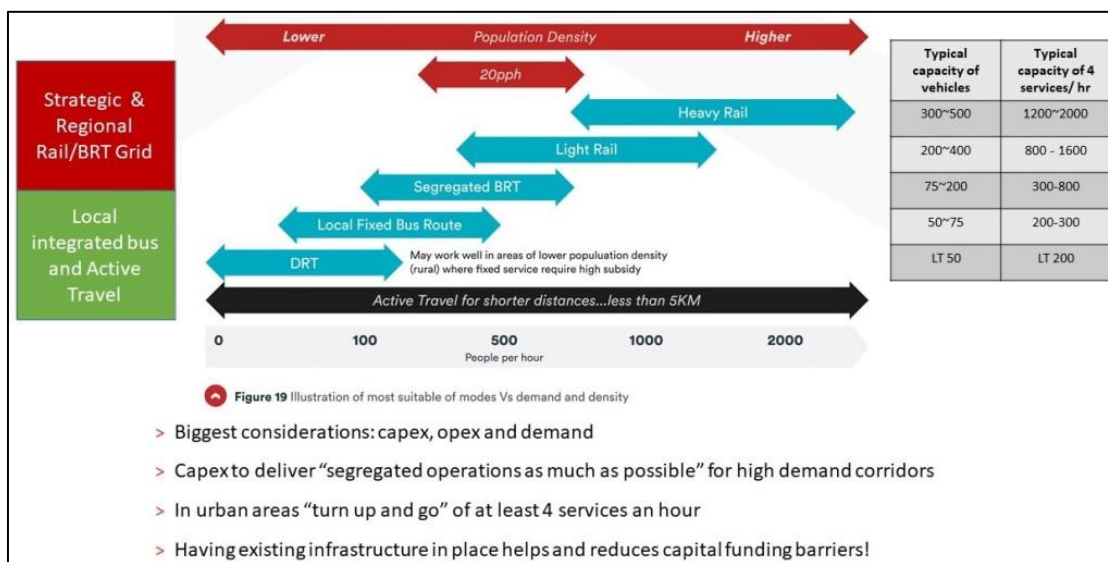


Figure 1 Illustration of mode applicability Vs demand

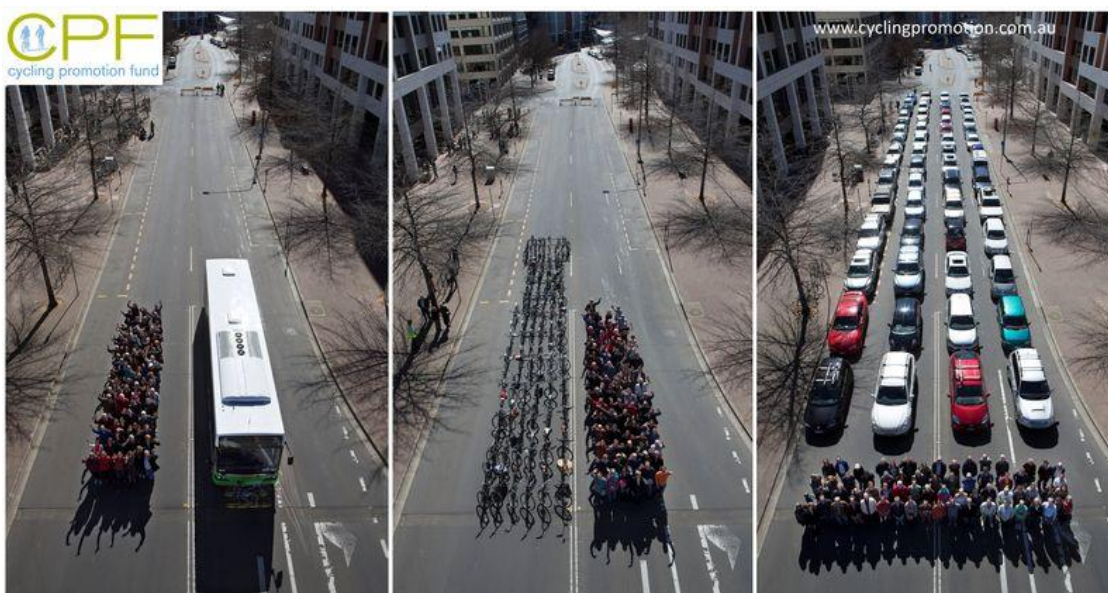


Figure 2 Road Space: car V bus V AT ((Source Cycling Promotion Fund, Canberra 2013)

So, broadly, the bigger the local demand (and this is often related to local population density) then fixed segregated rail (HR and LR) and BRT solutions are most efficient, for lower demand then local bus services can be most efficient. For much shorter journeys of up to 3~5km then Active Travel is best irrespective of population density.

In all cases trying to integrate all the various modes to create multi-modal, multi-operator public transport grids is fundamental. [Jarret Walker is always worth a read](#) on these subjects and in particular his book, Human Transit^{xiii} which is an essential read for all transport planners. *Figure 3 Figure 4*

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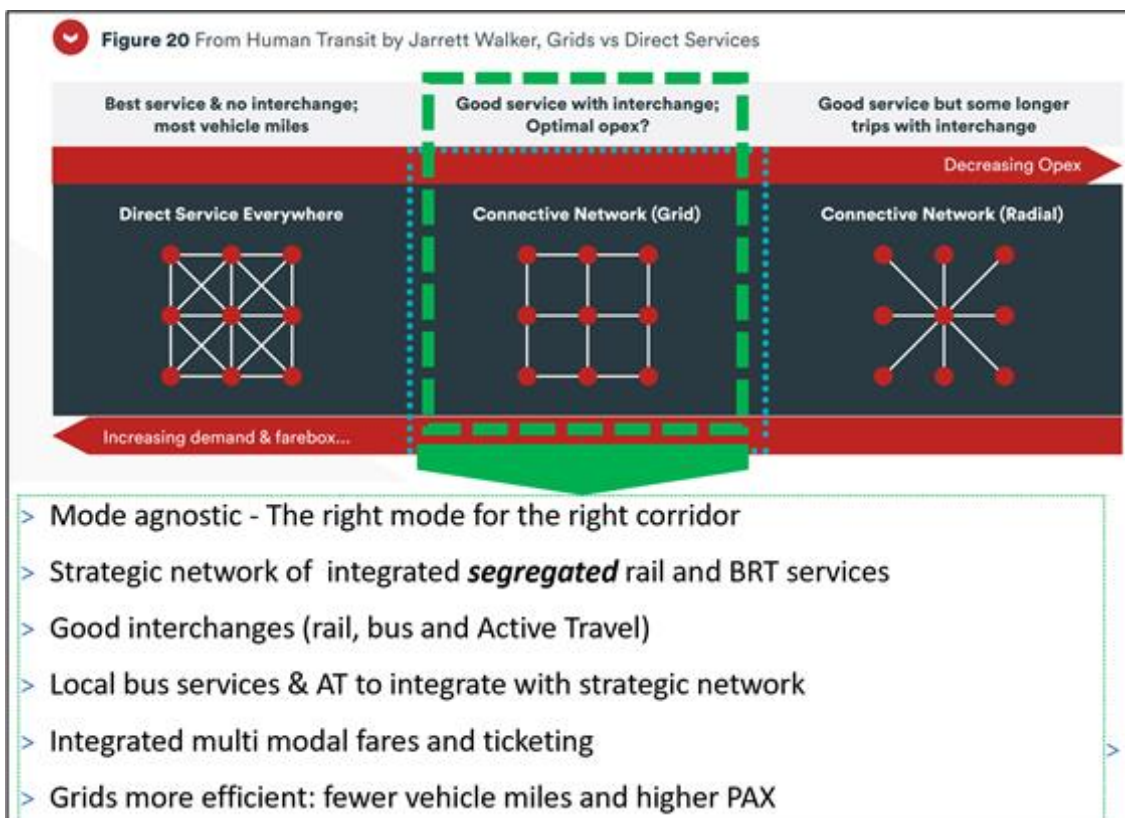


Figure 3 Service from everywhere to everywhere Vs Grids Vs Hub & Spoke

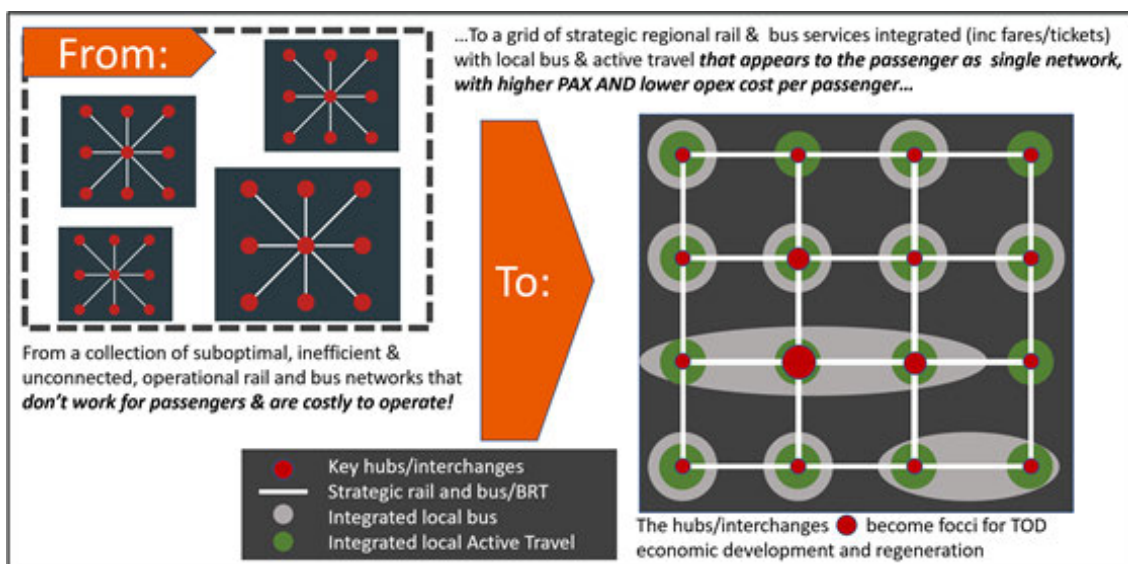


Figure 4 The multi-modal integrated grids we need for our Metros

It is overwhelmingly likely that in Wales, the full and effective integration of rail and bus (services & fares), and especially the ability to define and procure component bus services in the way described, needs both the [Bus Legislation set out by WG^{xiii}](#) and the full devolution of rail powers and funding, which UK Gov currently seems disinclined to support. Furthermore, it is vital that when developing policy and plans for fares, integration, etc we think and develop interventions across rail AND bus; and not fall back on more traditional mode siloed interventions. This is what TfW are trying to do in respect of primary strategic regional connections via its Metro Development Programmes.

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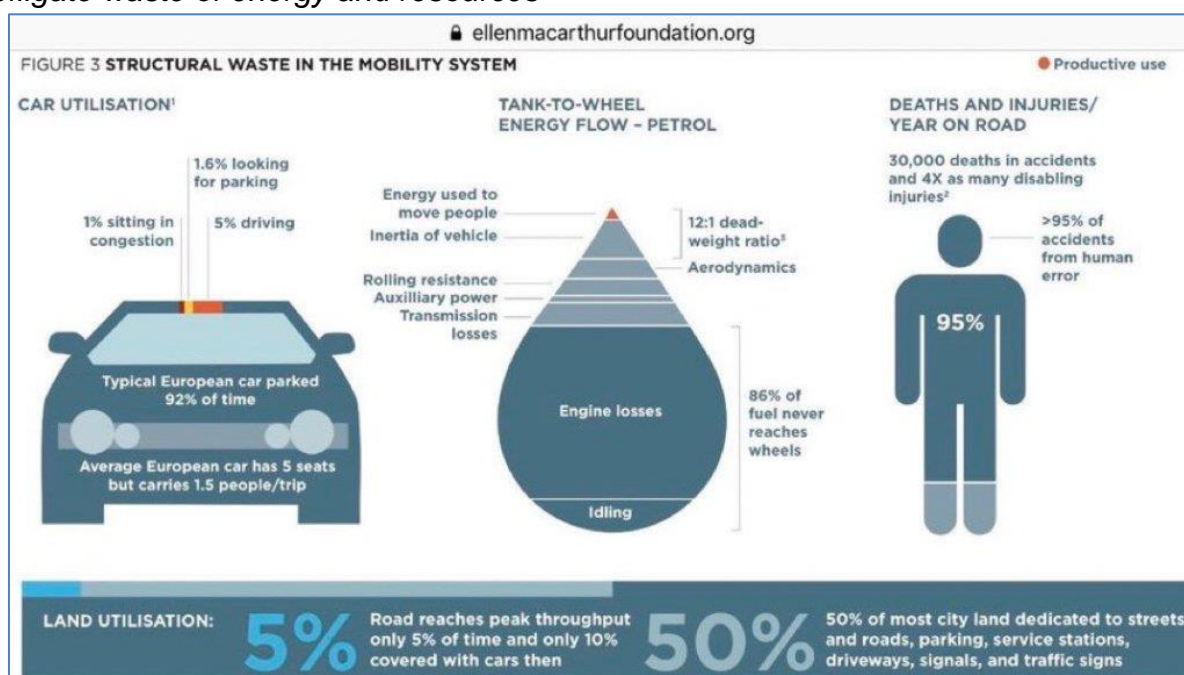
Wider negative external costs of car use

The discussions re: carbon emission and cars, can and should not ignore the wider external costs of car use that have been shared across society for the last 50 years, rather than being borne by drivers (who in effect receive a discount to use cars). These include for example: 160,000 Road Traffic Accidents (RTAs) per year in the UK, 25,000 serious injuries, 1700 deaths (1 cyclist is killed on average in the UK each day due to RTA) at an annual cost of £16Bn^{xiv}. Then add poor air quality & premature deaths as a result, particulates (esp. from tyres) and of course the phenomenon of induced demand (*i.e. build more roads get more cars unless you suppress demand*) and resulting unsustainable development and low-density sprawl.

I set out more details with references in this article on "[Cars and Climate Change](#)^{xv}". This [recent article by Todd Litman](#)^{xvi} of the Victoria Transport Planning Institute is also illuminating re: post covid equity in transport planning. I tried to capture some of Todd Litman's analysis re transport appraisal in another earlier this related to [Transport Planning Choices](#)^{xvii}.

We also have blind spot as to the gross inefficiency of cars and the stark fact that they spend at least 95% of their time doing absolutely nothing. Aside from being a grossly inefficient use of scarce natural resources, this clogs up streets, ties up natural resources and has a high impact on everything else we do. The fact we have to design our cities around what cars do when they are not moving is as bad as having to do so when they are. The fact we are still producing millions of cars whose level of utilisation will be as low is even more "crazy" and I suggest, globally irresponsible.

This illustration from a [report by the Ellen Macarthur Foundation](#)^{xviii} really exposes the profligate waste of energy and resources



The car industry greenwash, trying to persuade us that we can continue to use cars as we have over the last 50 years is deeply depressing – especially given many cars are getting

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bigger and heavier so requiring more energy to move, and now often being made available as part of an ongoing lease arrangement (*often with an option to replace with new every 2 or 3 years*). The reality is that [we need far fewer, smaller and better utilised cars](#) before they can help deal with our decarbonisation obligations.

In future, where “Autonomous Vehicles” may work well is in areas of low population density and more variable demand; we are already seeing this play out with Demand Responsive Transit (like Fflecsi) where opex could be reduced with the future application of AV technology. I did a blog on [Cars and AV back in 2017](#).

What is really damaging our high streets?

I have taken the following content from a recent blog – I feel it is very relevant to the challenge of reducing car depending in a way that can be linked to local regeneration.

For me, after the collapse of local and employment intensive heavy industry, the biggest negative influence on many of our city and town high streets, has been the huge relocation of office, retail, public services, etc to car based “out of town” locations in the last 50 years. South East Wales is covered in them; Trago Mills, Cardiff Gate, Imperial Park, Spytty Park, Navigation Park, Royal Glamorgan Hospital, Celtic Springs, McArthur Glen, Culverhouse Cross, etc. *Figure 5 Figure 6 Figure 7*

When you combine this reality with mass volume car-based corporate supermarket retail, the consequential demise of local independent shops and food retail, and now the perversity of drive through coffee shops, the primary cause of the sickness afflicting our high streets becomes clear. In the CCR, it is not, 30,000 or 40,000 more people commuting to Cardiff City Centre out of regional working population of over 700,000, it is car based out of town development. We have a collective blind spot with cars and a failure to recognise the wider societal and economic costs of the apparent freedoms they provide.

This was a key finding of a [recent report^{\[xlii\]} by the WG Foundational Economy Research Unit](#) that concluded that car based out of town and edge of town development had had a serious impact of the vitality of town centres such at Bridgend. A further report by [Audit Wales](#) further endorsed this analysis.



Figure 5 Newport Retail Park, Spytty, Newport

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Figure 6 Trago Mills Merthyr



Figure 7 Cardiff Gate Business Park

It is now abundantly clear that much of the damage to our high streets has been caused by the vast amount of car based low density sprawl, especially housing, offices and retail that over the last 50 years have sprung up at the edges of, or between our towns and cities.

The stark reality is that the best way to help regenerate our town and city centres is to disincentivise car based out of town development and to encourage the relocation of

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many “out of town” car-based offices, retail, housing, etc back to city and town centre locations. In fact, in a post Covid world with more flexible working this is essential. Local authorities need to take this seriously and focus their energies on the need to encourage much more development in/around public transport hubs and corridors and away from car dependent green field sites.

Welsh Government and our Local Authorities have a number of such car dependent carbon hungry offices, to which I would add the UK Government Patent Office, ONS and DVLA; there are more. Relocating much of the car-based office and retail estate back to city and town centres would be a good start to help regeneration and at the same time help make public transport more attractive and affordable by reducing the subsidy burden on government given the increased patronage.

I would also note that WG Health Department and Health Boards have a terrible record on locating major healthcare facilities – they are generally in places poorly connected to PT encouraging more car use. Llanfrechfa is a case in point and the proposed Velindre hospital in Cardiff has plans for 800 parking spaces – 500 for staff! Not surprising given it is planned to be located in area poorly connected to the rest of the region in public transport terms. Seems like Hywel Dda’s new hospital could go the same way. This cuts right against WG own planning policy - e.g. [Future Wales](#)^{xix} and will further complicate our decarbonisation efforts.



Figure 8 Illustration of "TOD" from ITDP.Org^{xx}

The move toward more widespread [Transit Oriented Development](#) (TOD) is a must and is perhaps as, if not more, important to deliver our decarbonisation obligations than the necessary investment in public transport infrastructure and services. See *Figure 8 Figure 9*

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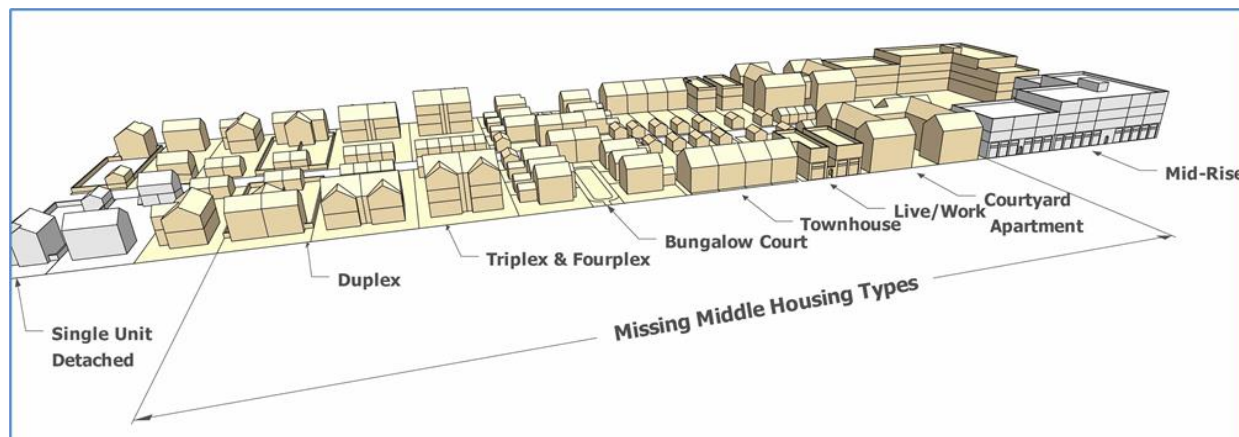


Figure 9 The Missing Middle [Source Opticos Design](#)

In this context, and as I have often replied to the challenge of “*Metro is just sucking the life out of valley towns*”, is, no, that is clearly just a lazy ill-informed assertion; the evidence is overwhelming clear that it is cars and car-based planning and development over the last 50 years that has destroyed many once vibrant local high streets. Metro and more of it, is essential to provide the public transport capacity we need to help deliver our decarbonisation obligations, alongside a transit oriented development based planning revolution and a focus on high street and community regeneration across Wales.

As a suggestion - I would make Transport for Wales a statutory consultee for major commercial, residential and public service developments. In such circumstance, perhaps TfW could support such a scheme but only when the developer/promoter provides, for example, £100M + for the extensive public transport infrastructure that will be required to minimise car use (*not as is often the case now, a S106 deal for a new bus stop*). In most cases the best and most sustainable solution is to densify existing sites (but whilst better for society and future generations may cost the developer a little more).

WG and TfW

I also think WG and TfW need to be more aggressive in accelerating further phases of the CVL network post the completion of the current programme in 2024. They are responsible for the asset (not DfT and NR) and still need to allocate further capital resource to address some of the limitations of the current contracted programme. I originally set out some of my concerns, in a publicly palatable manner, in respect of the limitations and the risks they faced following the procurement in in my [submission to this committee's predecessor in 2018](#)^{xxi}. Some of those risks have, in part, been manifest and the limitations I identified still need to be addressed (*eg 4tph on the City and Coryton Lines in Cardiff*) with a commensurate capital budget (to be fair a lot of work has been undertaken by WG and TfW to address these via TfW's Cardiff ad CCR Metro Programme). However, in my opinion, earlier choices/decision (& some I suspect political) re: traction power, rolling stock, staffing protocols and especially the retention of mainline standards, which were “cooked in” back in 2018, have in my opinion impacted in some cases, the potential overall capacity and flexibility of the network as well as increasing its build and operational costs.

I think WG and TfW have done a very good job to date, but I know in some cases better decisions could have been made...and still can. Certainly, the CVL network's formal

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designation should be reviewed (I still maintain it needs to be designated as Non-mainline like Tyne and Wear or Manchester); then for example, the suggestion from some that the new Metro vehicles should not operate using “Driver Only Operation” is motivated I suspect by reasons other than passenger experience, network capacity and operational efficiency.

The legacy of the ERDF targets (*which I originally set out in my work with WG in 2015 to help drive an ambitions procurement – which it did*) should not be a constraint on developing and delivering the most attractive and efficient network when Metro services start operating over the next 2~3 years. We need to be thinking in terms of developing a high capacity, connected multi modal grid of public transport services (more like the London Underground) with high frequency services and good interchange and not a network where every service has to go Cardiff Central. Once the CVL transformation is delivered by 2024, I anticipate there will be an opportunity for further enhancement and optimisation. I did cover some this in an article earlier this year [South Wales Metro & Devolution – Mark Barry \(swalesmetroprof.blog\)](https://swalesmetroprof.blog)^{xxii} for the rail industry trade press.

To repeat and in summary...

To conclude, in summary and simply put, to get close to achieving our decarbonisation obligations re surface transport, we need to be far more aggressive:

- Fewer cars: 30~40% fewer, then let's support EV for those smaller and lighter vehicles that remain! – *the well-resourced lobbying of the car industry and a certain amount of greenwashing can't hide the fact we need fewer, smaller and better utilised cars before we EV them.*
- More Public Transport and Active Travel across Wales; in that context the development of multi-modal integrated grids of public transport services– especially in urban areas; the bus reform proposals will be essential to define and procure many of the component bus services and to help implementation of multi-modal fares and ticketing.
- I estimate [a capital programme of £3.5~4Bn](#)^{xxiii} over the next 10-15 years to at least double capacity – half of which should fall to the UK Government given the work required is related to the NR rail asset for which UK Gov (via DfT and NR) are responsible. This is something WG Central Finance also need to come to terms with – and by implication the need to generate revenue to support both the additional operational costs and to service further capital borrowing – road pricing is an inevitable reality. *I would also point out that WG are still committed to spending a further £400-500M to complete the HoV rd?*
- Much more Transit Oriented Development and less car-based sprawl. It is the latter (as found in the Foundation Economy Research Report for WG) that is dislocating communities and high streets all over Wales. This has to be the focus of Wales regions and local authorities....do we in fact need “Metro Development

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Corporation(s)" in Wales, with a focus on TOD linked to our Metro Development Programmes which TfW have been developing?

- Demand Management for car use and road space, especially road pricing are unavoidable realities and socially justified. We cannot continue to subsidise such excessive and environmentally damaging car use.

All these require rough choices and sacrifices – but which are, in my opinion, unavoidable.

Thank you.

Summary of relevant roles and reports, articles, etc

I have been acting as a Strategic Advisor to TfW (part time) since April 2020 and am helping, in an independent capacity, both Cardiff Council and the Cardiff Capital Region in respect of transport. I am also (again part time) Professor of Practice in Connectivity at Cardiff University (since April 2016) and have run events and published reports and articles related to Metro, most notably the "Metro and Me^{xxiv}" report and event held on 8th October 2018 (in partnership with Cardiff University, Capital Law, IWA and Arup).

- Author of 2011 report, "A Metro Wales Capital City Region^{xxv}" commissioned by the Cardiff Business Partnership and published by the Institute of Welsh Affairs
- Submitted and presented evidence to the Westminster Transport Committee's review of High-Speed Rail in 2011^{xxvi}
- Author of, "A Cardiff City Region Metro: transform | regenerate | connect^{xxvii}" in 2012/3 developed with the Metro Consortium
- Led development of the 2013 Welsh Government commissioned, "Metro Impact Study^{xxviii}"
- Led development of South Wales Metro for Welsh Government (PT) Nov 2013 – Jan 2016
- Prepared, "The Rail Network in Wales – The Case for Investment", for WG in 2018^{xxix}
- Presented evidence to the Senedd Economy and Transport Committee re: the procurement of the W&B franchise in 2018^{xxx}
- Prepared Welsh Government's Rail Enhancement priorities^{xxxi} in 2020 and the supporting analysis of rail investment in Wales^{xxxii}
- Helped prepare Cardiff Council's Transport White Paper and the Cardiff Crossrail proposals^{xxxiii}
- Prepared advice and suggestions to the South East Wales Transport Commission^{xxxiv}
- Developed the concept of a Swansea Bay Metro now being progressed via TfW.
- Presented evidence to WASC re Rail investment in Wales^{xxxv}
- Prepared articles re the [South Wales Metro^{xxxvi}](#) and [Metros across Wales](#) for the trade and national media in the last six months^{xxxvii}

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Mark Barry is Professor of Practice in Connectivity at Cardiff University's School of Geography and Planning. Mark also has his own consulting business M&G Barry Consulting. He led South Wales Metro Development for Welsh Government from December 2013 to January 2016 following the publication of his Metro Impact Study in 2013. He also acts (since April 2020) as a part time Strategic Advisor to Transport for Wales.



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Ysgol Daearyddiaeth a Chynllunio

>>>>>ENDNOTES

- i [Climate Change 2022: Mitigation of Climate Change \(ipcc.ch\)](#)
- ii [WGII Summary for Policymakers Headline Statements \(ipcc.ch\)](#)
- iii [Llwybr Newydd: the Wales Transport Strategy 2021 | GOV.WALES](#)
- iv [Advice-Report-The-path-to-a-Net-Zero-Wales.pdf \(theccc.org.uk\)](#)
- v [Net Zero Wales | GOV.WALES](#)
- vi [Wales' Metros – Update Feb 2022 – Mark Barry \(swalesmetroprof.blog\)](#)
- vii [Summary of Welsh Transport Priorities...and relative importance of HS2 - YouTube](#)
- viii [Road pricing \(parliament.uk\)](#)
- ix [GBR – WISP Consultation. My response...Jan 2022 – Mark Barry \(swalesmetroprof.blog\)](#)
- x [Wales, Barnett and HS2..... - YouTube](#)
- xi [Wales, Transport Planning & Choices... – Mark Barry \(swalesmetroprof.blog\)](#)
- xii [Human Transit — The professional blog of public transit consultant Jarrett Walker.](#)
- xiii [One network, one timetable, one ticket, Welsh Government sets out plans to change the way we travel | GOV.WALES](#)
- xiv [Road accident costs Great Britain 2010-2018 | Statista](#)
- xv [Climate Change, Cars & Challenges – Mark Barry \(swalesmetroprof.blog\)](#)
- xvi [bcpct.pdf \(vtpi.org\)](#)
- xvii [Wales, Transport Planning & Choices... – Mark Barry \(swalesmetroprof.blog\)](#)
- xviii [Growth within: a circular economy vision for a competitive Europe \(ellenmacarthurfoundation.org\)](#)
- xix [Future Wales: the national plan 2040 | GOV.WALES](#)
- xx [What is TOD? - Institute for Transportation and Development Policy \(itdp.org\)](#)
- xxi [Article \(senedd.wales\)](#)
- xxii [South Wales Metro & Devolution – Mark Barry \(swalesmetroprof.blog\)](#)
- xxiii [Levelling Up, Working Together? A Transport Enhancement Programme for Wales – Mark Barry \(swalesmetroprof.blog\)](#)
- xxiv Various, “Metro & Me (2018), IWA, Capital Law, Arup, Cardiff University, Mark Barry, Geraint Talfan Davies [Metro & Me, October 2018 – Mark Barry \(swalesmetroprof.blog\)](#)
- xxv Barry M (2011), “A Metro for Wales’ Capital City Region – Connecting Cardiff, Newport and The Valleys”, Cardiff Business Partnership/Institute of Welsh Affairs. [iwa-metroreport.pdf](#)
- xxvi [House of Commons - Transport Committee - Written Evidence \(parliament.uk\)](#)
- xxvii Barry M & Metro Consortium (2013), A Cardiff City Region Metro: transform | regenerate | connect, Institute of Welsh Affairs.

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- xxviii Barry M & Metro Consortium (2013), Metro Impact Study, Welsh Government.
[South Wales Metro: impact study | GOV.WALES](#)
- xxix [The Rail Network in Wales \(gov.wales\)](#)
- xxx [Article \(senedd.wales\)](#)
- xxxi [Mainline railway enhancement requirements | GOV.WALES](#)
- xxxii [Historical investment in rail infrastructure enhancements \[HTML\] | GOV.WALES](#)
- xxxiii [Cardiff Transport White Paper – Mark Barry \(swalesmetroprof.blog\)](#)
- xxxiv [A Public Transport Grid for the M4 Corridor... – Mark Barry \(swalesmetroprof.blog\)](#)
- xxxv <https://committees.parliament.uk/writtenevidence/19482/html/>
<https://committees.parliament.uk/writtenevidence/22844/html/>
<https://committees.parliament.uk/writtenevidence/22844/html/>
- xxxvi [South Wales Metro & Devolution – Mark Barry \(swalesmetroprof.blog\)](#)
- xxxvii [Wales' Metros – Update Feb 2022 – Mark Barry \(swalesmetroprof.blog\)](#)

Evidence to the Welsh Parliament Climate Change, Environment and Infrastructure Committee Session on 26 May 2022 on Bus and Rail Transport in Wales

Prof. Graham Parkhurst

Professor of Sustainable Mobility, Centre for Transport & Society, University of the West of England
Bristol

The Future Priorities for Public Transport in the Changing Context of Mobility Demands Following the COVID-19 Lockdowns

The present evidence note emphasises that, in considering the context for post-COVID recovery and policy priorities for bus and rail in Wales, it is important to consider the changing socioeconomic context of demand for public transport and the extent to which the current situation is part of a set of trends that will variously continue, stabilise or reverse. The final Section 5 provides a summary of some of the key policy priorities.

1. Importance of the Changes in Public Transport Policies

The national bus and rail strategies of March and May 2021 respectively have their origins in pre-pandemic debates that go back decades. The two transport modes have been regulated rather differently, and have been given different political priorities: rail has typically provided for one-third of public transport trips, but received billions of pounds in service support each year. Buses have provided for two-thirds of public transport trips, but received a fraction of the subsidy support given to rail.

Strong views have been expressed ever since bus deregulation in 1985 for greater public control. However, the industry has matured over the decades, and collaboration between public and private sectors enhanced, with informal and legally formal partnership arrangements possible. Public-private collaboration received a further boost due to the particular needs and constraints of the COVID-19 pandemic. The key problem that the bus industry faced in delivering more sustainable mobility prior to the pandemic was that overall bus ridership had tended to fall over time, rather than increase. A number of factors are seen to explain this:

- It is very difficult to operate bus services reliably to timetable in a context of road networks dominated by private motor vehicles (both moving and parked) with only small parts of the network benefitting from priorities which are often intermittent and almost absent outside of urban areas,
- Difficulty recruiting and retaining bus drivers in a competitive labour market, in which jobs such as forklift truck and goods vehicle driving can offer higher pay and less stressful working conditions,
- Rising costs due to diesel prices and labour rates,
- The need to convert from diesel to more sustainable fuels, but limited scope to fund the additional depot or vehicle costs from revenues,
- Boarding times outside London are slow due to individual ticket purchasing/checking and there are barriers to integrated ticketing due to the need to protect revenues.

Of these problems, the first four must be faced, whether the public sector controls the bus network via franchises, or voluntary collaboration continues. The first is a political problem which requires politicians to make the case and convince the public that additional bus priorities are necessary. The middle three issues are funding and finance problems. The public sector may find it easier to invest if it has strong political controls over the bus services, but the money still needs to be found.

The last issue is the one which could potentially be changed by a more contractual or franchised basis for bus operation, as the revenue risk is passed from the private sector to the public sector, which effectively has an operating contract. London standards of intermodality and capped-fare ticketing are can be achieved but at a cost to the public sector far higher than has been typical elsewhere. The rise of Mobility-as-a-Service is also potentially a game-changer which solves this problem in a different way: allowing operators to participate without having to share commercial information and being confident that revenues will be appropriately allocated. These technical solutions, often reliant on 5G communications, are though still under development.

Overall, then, it can be argued that the bus problem is primarily one of funding, and that regulation would only affect these problems at the margin.

Considering rail, the case for organisational change is strong. The role of contractual arrangements and separation of infrastructure, services, and maintenance in rail safety and customer service failures have been well documented. However, in sustainable mobility terms it can be observed that despite these failures, rail demand had been growing nationally (if focussed on travel into and between the major cities) over a long period prior the Pandemic. One of the key challenges was finding solutions for new capacity, which was perhaps the strongest argument for HS2.

However, the largest problem for the sustainable mobility contribution of the rail sector is how long it takes to deliver new projects. In many cases projects would take so long to move through the prioritisation and delivery processes that if they are not already advanced, they will arrive too late in the NetZero decarbonisation timeline to make a critical difference. For this reason, the focus of rail strategy should arguable be to use the existing infrastructure better, with the conversion of existing rail services to zero carbon operation (e.g. electrification, hydrogen fuel cell).

If Great British Railways can reduce the time horizons for project delivery then rail line and station re-openings could play a bigger role, but HS2 will represent a major demand for sector skills which are a scarce resource.

However, post-COVID, with a decline in demand for commuting (and associated revenues), the rail sector is needing to consider again 'what the railway is for'. A reduced focus on commuting to the large cities, and particularly London, may create more scope for the development of rail services within Wales and the English regions oriented to more local travel needs, and considering social and leisure purposes alongside travel for work. The following sections develop this idea that future mobility overall will be more about leisure and wellbeing, and somewhat less about economic necessity, although recognising that the experience of different citizens may be very different.

2. Impacts of COVID-19 on Travel Behaviour

The 2020-2022 COVID-19 Pandemic and periods of restriction led to changes in four broad domains which influence the demand for travel (Figure 1):

- Altered perceptions by individuals about what is important in life, and new values given to different kinds of space,
- New relationships with technology, particularly those for facilitating remote communications,

- A social and psychological context in which behaviours become more or less acceptable within society (such as remote working and meeting) and the interruption of habits,
- Economic impacts which have impacted on the labour market and overall economic activity, with the emergence of winners and losers as a result (some people saw their incomes reduce, others did not, and were able to increase their savings).

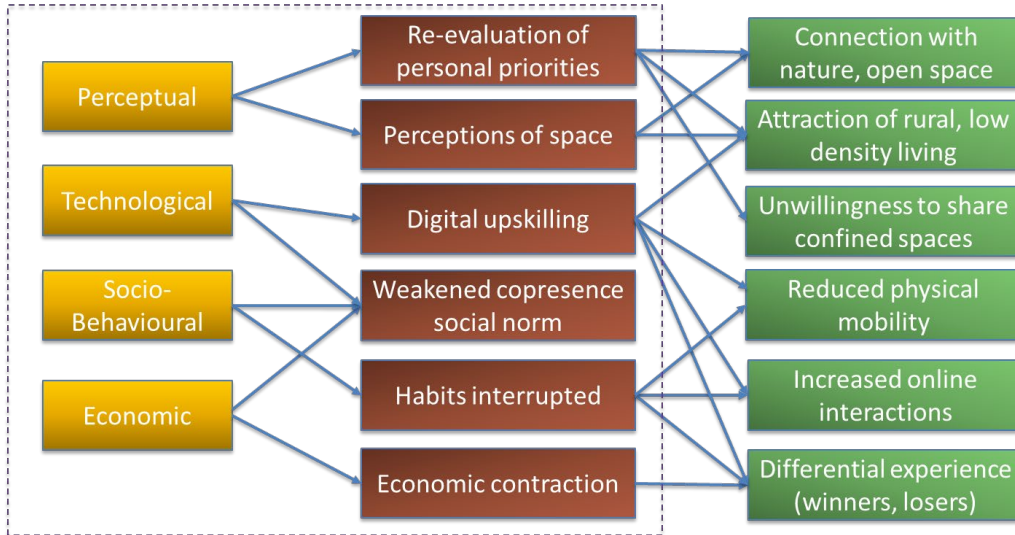


Figure 1: Overview of Impacts and Processes of COVID-19 Pandemic and Lockdowns on the Demand for Mobility

Environmental psychologists have always emphasised the wellbeing benefits of access to nature (green and blue spaces), and to a lesser extent, high-quality urban environments (e.g. historic centres). The lockdowns not only gave more people the time to discover or rediscover environments of wellbeing, the concept of personal space was emphasised by the campaigns to respect interpersonal distance. One result is that London property prices have risen relatively slowly in the last two years, whereas areas associated with rural living, including Wales, have shown the strongest growth¹.

The lockdowns also interrupted or ended time commitments for people, including jobs and social activities. Some businesses closed for good. Even where people were not forced to make life changes they had more time available to consider their futures. As a result, labour market turnover has been increased, with an increased rate of people over-65 retiring, a higher rate of younger people losing their jobs and being re-employed, combined with a higher rate of people choosing to seek new roles.

The lockdowns increased the extent to which walking and cycling (and also other modes such as e-scooters) were used. These levels of using active travel may have reduced post-lockdown, but individuals retain their raised awareness of those modes, and their potential to use them again.

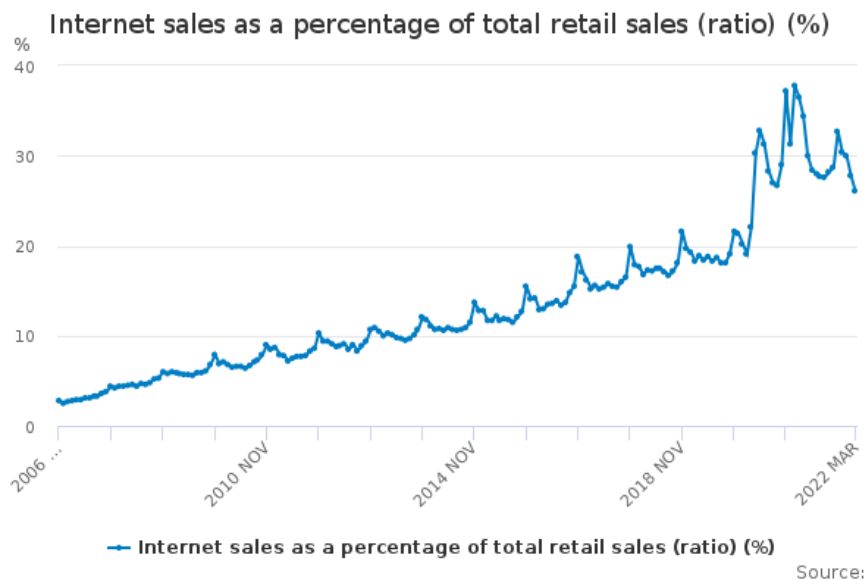
Perhaps most important of the COVID-19 impacts relates to technology. Legal requirements to stay at home resulted in:

- Rapid adoption of enhanced equipment and software for social and economic interaction at distance, increasing both the scope and quality of remote communications.

¹ The Nationwide House Price Index shows a 29% increase in predominantly rural areas over the last five years, suggesting COVID-19 increased an established trend <https://www.nationwidehousepriceindex.co.uk/reports>

- Upskilling of the population with respect to remote communication skills so that remote communication was no longer specialist, but a mainstream and inclusive activity, and, most importantly,
- Changing social acceptance of when it is acceptable to use remote interaction in place of in-person interaction.

As well as facilitating homeworking, the lockdowns boosted established trend for growing e-commerce, with a number of high-profile losses from traditional retailing recorded, such as the department store chain Debenhams.



Source:

Figure 2: Boost to trend for online commerce due to lockdown²

Taken together, these changes in perceptions, aspirations, capabilities, constraints and opportunities have in some cases resulted in people changing their long-run travel behaviour and patterns (rather than returning to their post-COVID situations). In some cases people have undergone 'moments of change' associated with more radical changes in behaviour (e.g. changing mode of travel, place of residence and location of travel together, rather than simply changing employment location.)

These developments suggest enhanced opportunities for policy to influence travel behaviour, although that window of opportunity will be limited. The key challenge for transport policy and planning is to understand how far these impacts and processes will tend to persist, and how far they will tend to reverse, and whether policy and practice can make a difference to these underlying tendencies.

3. Other Major Changes in the Mobility Context

The task of future policymaking is complicated by other factors, not related, or only partly related, to COVID-19.

- Rising energy and road-fuel costs not only increase the cost of private car use, but domestic energy costs reduce disposable incomes and hence the demand for travel. Public transport providers will also see increases in one of the key costs of provision.

² <https://www.ons.gov.uk/businessindustryandtrade/retailindustry/timeseries/j4mc/drsi>

- Government policies to promote a shift from internal combustion engine cars to electric cars are now having some success (one in six new cars was electric in April 2022) and will change perceptions about what constitutes the most energy efficient and clean way to travel, but also brings vehicles with different capabilities, notably a shorter range before refuelling, which may change medium and long-distance journey demands.
- To some extent micro-mobility modes such as e-scooters may also pose a threat to short-range bus trips. An in-app survey of Bristol VOI users indicated that the modes seen to have been an alternative to scooter use were car (24%), taxi (12%), bus (15%), bike (12%) and walk (31%). However, public transport supply was reduced during the pandemic, and e-scooters promoted as a means of avoiding COVID-19 exposure. More research is needed in the post-pandemic context to understand if e-scooters do compete with public transport, or perhaps complement public transport by enabling low-car lifestyles.
- Brexit and COVID have had impacts on supply chains which may impact private and public-sector planning and decision-making regarding exposure to globalisation, potentially encouraging re-shoring. Circular economy aspirations for wider sustainability objectives also suggest changes in supply chains. Ultimately such changes may affect both patterns and demands for commuting and also freight flows.
- War between Ukraine and Russia will likely bring longer-term economic output, supply shortage, and fuel prices impacts.

4. Post-Lockdown Public Transport Recovery and Development to Date

Transport Focus found in March 2022³ that 87% of rail users and 89% of bus users felt “fairly” or “very” safe with respect to COVID-19 when travelling, although the survey would not have captured those continuing to avoid public transport for reasons of infection concern. As of mid-May, UK Department for Transport statistics⁴ showed that, nationally, rail had recovered to 75-80% of pre-pandemic weekday levels and bus to 80-85%. However, weekend recovery on both modes has been stronger, up to 85% on rail and 95% on bus, on specific days. These observations fit with the explanation that travel for leisure and visiting friends and family have recovered relatively strongly, because presence is more important for those activities, whereas commuting has been subject to greater discretion, as home-working can substitute.

Evidence from other modes also supports that explanation: car travel demand is now more than 100% of pre-COVID levels at weekends, but lower than 95% on weekdays. Cycling, whilst at nowhere near the peaks during lockdown, shows variation well above the pre-pandemic situation (on some specific days double, and overall perhaps 20-30% higher).

Survey analyses undertaken by the Centre for Transport & Society have identified a reluctance to return to the office full-time. A survey of 466 West of England employees at two time-points (Dec 2020/Jan 2021 and Apr-May 2021) showed:

- Half were ‘very satisfied’ with home working in the second survey, and the positive ratings had increased from the first survey.
- 63% had more choice in the times of day that they work
- 15% stated that their employer now requires greater flexibility from them in terms of the hours they work

³ <https://d3cez36w5wymxj.cloudfront.net/wp-content/uploads/2022/03/04092502/Travel-during-Covid-19-survey-%E2%80%93-4-March-2022.pdf>

⁴ <https://www.gov.uk/government/statistics/transport-use-during-the-coronavirus-covid-19-pandemic>

- Almost two thirds of respondents with caring responsibilities said that they now find it easier to fit these around work.

However, home-working was also associated with negative developments by some: a third of respondents found it harder to maintain a healthy work-life balance, and more people reported working longer hours than shorter hours compared with pre-pandemic.

When asked about their Expectations of life in the year after restrictions are lifted compared with pre-pandemic:

- 82% expecting to be working from home more
- 73% expecting to be commuting less
- 61% expecting to be walking more and 44% cycling more
- 57% expecting to be driving less

Another project has examined the Milton Park Business Park at Didcot with a smaller sample surveyed at three points (July 2020, Winter 2020, July 2021). The third survey showed:

- 57% continued to work from home following end of lockdown
- 26% mix working from home with working at the business park
- 15% are working solely at the business park.

In May 2022 the Milton Park travel planner reported that car traffic at the site had only returned to 61% of pre-pandemic levels due to a mixed of working on site and at home.

Therefore, it seems likely that demand for commuter travel on public transport may take a long time to return to pre-pandemic levels, and if it does it may be due to population growth, rather than people reversing their preferred working location practices. This does assume that organisations continue to hold flexible policies, but given that the management also benefit from flexibility, whilst homeworking reduces pressures on office space (or enables businesses to downsize and save money) then it seems likely that many will.

A negative consequence of reduced rail commuting is that peak fares provide higher revenues (as well as seeking to spread demand out of the peaks). A positive consequence is that some of the levels of overcrowding ('passengers in excess of capacity') seen pre-pandemic may not re-occur for some time.

5. Summary: Policy Priorities

- There is evidence that the traditional needs to travel in the past, particularly travel for work and shopping, which have tended to dominate transport planning are increasingly being transferred to remote working and e-commerce. If more of this 'necessary' travel is undertaken digitally in the future, transport planning should put greater emphasis on the leisure and wellbeing roles of mobility: people need to be physically active in their communities and in natural environments to be included in society and to have good physical and mental health. There may be greater economic opportunities for the leisure and tourism sectors if people 'waste' less time travelling for essential needs and therefore seek to spend their 'travel budgets' (both in terms of time and money) for other purposes.
- Similarly, transport planning should focus less on peak demands in urban areas. With less need to spread demand for public transport from the peak to off-peak, it is perhaps time to

re-think the peak fares premium on rail⁵. New travellers may be attracted to rail through lower fares if there is spare capacity that could be filled, particularly in the context of high road fuel costs. This would also have social inclusion benefits as people on low incomes often have less discretion about when and how they travel.

- The rise of the electric car presents a threat to public transport. From 2030 all new cars will need to have significant electric-only operation. As we move from the phase of promoting the early adoption of electric cars to them becoming mainstream, there are risks to public transport. Owners with home photovoltaic charging facilities may be paying no energy costs for some of their car journeys. They are likely to perceive their cars as being less polluting than diesel buses and trains. Transitioning public transport from fossil fuel-power and internal combustion engines in the next decade is critical if it is to continue to appear relevant.
- Managing the demand for car use has always been an important indirect factor in public transport policy. That is even more important with the rise of the expensive-to-buy but potentially cheap-to-use electric car. Pay-as-you-drive road use is likely to be the most effective way of managing the rise in electric car use that are perceived as cheap to use and less environmentally damaging than internal combustion engine cars⁶. However, there may be opportunities to promote park-and-ride with charging facilities at public transport hubs, particularly for trips for which electric car range might be a limitation.
- Public transport demand is strongly linked to the attractiveness of urban centres, as they are dependent on public transport for making them highly accessible. Together they provide an energy and space efficient form of sustainable urban development. For this reason, the extent to which urban areas continue to provide for commercial and leisure activities is critical to providing financially viable and attractive public transport services. It will be important for sustainable development, and public transport, that new urban activity is promoted to replace that lost due to less intense demands for working and shopping activity in the future.

16 May 2022

⁵ In some other countries there is no penalty for travelling in the early morning, simply an advance purchase discount used to spread demand between trains throughout the day.

⁶ Not only is part of the electric energy used by electric cars generated from fossil fuel sources, there is growing evidence that the emissions from vehicle tyres and brakes (whether electrically-powered or not) are important environmental pollutants. <https://www.emissionsanalytics.com/news/gaining-traction-losing-tread>

About us

Campaign for Better Transport's vision is for all communities to have access to high quality, sustainable transport that meets their needs, improves quality of life and protects the environment. We are a charity and operate in England and Wales.

Action required for modal shift and behaviour change

Ensuring all communities have access to reliable, convenient, affordable and sustainable transport is vital. It is essential to economic growth creation and a key enabler of levelling up. It provides access to employment and training opportunities, and to essential services, leisure facilities, and seeing family and friends. Modal shift away from private car journeys to public transport, walking and cycling, as well as moving to cleaner vehicles for unavoidable journeys, are also essential for reaching net zero carbon targets.

Transport emissions across the UK are now the biggest sectoral contributor to carbon emissions, responsible for 28% of all carbon emissions. They have remained stubbornly high while those from the energy sector, for example, have reduced markedly. The urgent need to cut emissions, if the UK is to make its contribution to the internationally agreed effort to keep the rise in greenhouse gas emissions within 1.5 degrees of pre-industrial levels, requires a sharp cut in transport emissions over the next five to ten years.

The technological advances that promise a reduced carbon footprint, such as the transformation of the car fleet from petrol and diesel to electric, can only occur over a much longer timescale. Other changes, such as the replacement of kerosene in aviation, are even further away. The only way to secure effective reductions from transport emissions within the necessary window is through modal shift from private road transport to rail, bus or active travel options.

The Wales Transport Strategy 2021 recognised the urgency of addressing climate change and the importance of modal shift for achieving this, by setting a target of 45% of journeys to be made by public transport, walking and cycling by 2040 (up from 32% currently).

It is widely established that achieving modal shift requires a mixture of carrot and stick policies.

First and foremost, it requires an affordable well-integrated public transport network and safe integrated walking and cycling infrastructure to be in place. While we will discuss bus and rail provision below, public transport and active travel can be supplemented by a mixture of shared mobility modes, such as cycle and e-scooter hire and car clubs. The right pricing and other incentives are also needed to entice people away from private cars and onto public transport. This can include permanently low fares and daily caps, price promotions and

mobility credits offered to people scrapping a polluting vehicle or those moving into a new area to get to know the local transport network.

These need to be complemented with policies that nudge people away from car ownership and car use. One study found that the most effective policy tool to achieve this is charging for driving in busy city centres, such as congestion or clean air charges, leading to between 12-33% reduction in city-centre cars.ⁱ Other effective interventions include reducing space allocated to parking provision, increasing the cost of parking permits and short-stay charges, workplace parking levies and restricting car access to certain areas.

There has been a reluctance in some areas to introduce such measures that can be portrayed by opponents as anti-car, and with the suggestion that they damage the economy. Yet the evidence from places as diverse as Bavaria and Nottingham has demonstrated that an urban area that constrains the car while offering good access on foot, by bike and public transport prospers economically, not least because the ambience of those urban centres is more attractive to people.

Behaviour change programmes that inform people about the need for such measures are necessary. Many people are still unaware of the urgency to address climate change or of the severe health impacts of local air pollution. Others may be worried about the implications of climate change and air pollution but sceptical that changing their own behaviour would help. Increasing public awareness of these issues are important, alongside showing people how easy it could be to make a change through programmes such as workplace and school/university travel planning.

Again, the Wales Transport Strategy recognises the role of all these interventions. The key will be sufficient funding allocations and implementation at devolved and local government levels within a short timeframe to have the best chance of achieving the modal shift target and contributing to climate reduction pathways.

Last but not least, investment in new road capacity only makes car dependency worse and increases demand for travel by private car. This is why we welcome the leadership shown by the Welsh government is starting the Roads Review and listening to the panel's recommendations so far. We look forward to seeing the outcome of the full review.

Priorities for post-covid recovery for Welsh bus and rail

The pandemic has had a devastating impact on public transport use. Early in the pandemic, the governments of the UK advised the public to avoid public transport, causing nervousness about virus transmission that still persists among many passengers, particularly the elderly. Despite operators' best efforts, changing work patterns mean that local bus and rail use across Great Britain remain at approximately 75-80 per cent of pre-pandemic levels. Regular polling from Transport Focus has identified that certain sections of society remain reticent to get back to buses and trains.ⁱⁱ The use of bus by concessionary passholders remains even more depressed.

Very early on, we at Campaign for Better Transport identified the need for a government campaign to encourage people back on buses and train as a safe and sustainable way to

travel. We launched *The Way Forward is Public Transport* in May 2021, calling for such a campaign alongside a fares promotion and a continuation of covid-related funding.ⁱⁱⁱ So we were delighted to see Transport for Wales start The Real Social Network campaign and accompanying promotions. We look forward to finding out the extent to which this boosts public transport use.

The pandemic also resulted in many employers and their employees embracing hybrid and flexible working models, choosing to maintain significant levels of working from home and commuting into the office less frequently. To attract previous passenger back more frequently and new passengers away from private cars, bus and rail services need to be a more attractive and affordable option in the longer term.

While every effort must be made to reassure previous customers that buses and trains are clean and safe, attracting new passengers away from cars is vital for meeting carbon reduction pathways. Affordability is a key factor and regrettably what we have seen over recent decades is that public transport has become dearer relative to the cost of motoring or flying. Between 1997-2020, the cost of owning and using a motor vehicle have increased by 58%, while rail fares have increased by 132% and bus and coach fares by 192%.^{iv} This means that the price signals sent have been the exact opposite of those needed to secure modal shift to public transport.

Bus reform

The pandemic has had a devastating impact on bus services across the UK. Campaign for Better Transport found that bus services in Wales declined by 45% in the 10 years between 2011/12-2020/21, and 36% of bus services were lost in the first year of the pandemic alone – the largest decline of any region.^v As covid recovery funding is tapering off, operators are planning further reductions to adjust to “a new normal” of decreased demand. However, reduced frequencies and route cuts will isolate people in more remote locations and affect the ability to access employment.

The Welsh Government's Bus White Paper sets a very welcome and ambitious vision for one network, one timetable and one ticket. This will make bus travel easy and attractive for everyone in Wales, and allow greater integration between rail and bus service provision.

Research we have conducted for the Department for Transport (as yet unpublished) shows that some local authorities in England lack the experience, expertise, resources and capacity to work effectively with operators to make Enhanced Partnerships and franchising work, without additional funding and support to enable effective delivery. In this vein, it is crucial that the new regulatory framework in Wales enables the government, local authorities and bus operators to work well together to deliver services that work best for passengers locally.

The experience with the National Bus Strategy for England demonstrates that sufficient funding, particularly revenue funding, is crucial. Whole £3 billion was promised to transform bus services, only £1.08 billion was allocated to 31 local transport authorities, although all 77 authorities applied. Even winning authorities only received a fraction of the funding they had requested, leaving them needing to cherry-pick which improvements to implement, but they can only work as a package. Faster bus services will not attract people to buses if they still

don't take them to destinations they want to go to, or are too expensive – and vice versa. Losing local authorities on the other hand are left wondering how to sustain economically and socially necessary routes without funding.

Having a single funding pot, with multi-year allocations for local buses – provisional on them meeting certain objectives – instead of stop-start competitive funding pots, would improve certainty and allow for better planning and delivery. Reprioritising funding away from carbon intensive modes, such as road building, is also needed. Franchise contracts also need to be attractive enough for a good number of operators to come forward to bid and generate a healthy competition. The Welsh bus strategy must therefore be underpinned by the long-term funding commitment needed to make it a reality.

Research by Urban Transport Group suggests that increasing revenue support for bus services in the six largest city regions in England by £1.7-2.3 billion a year above pre-pandemic levels would allow improvements to existing routes, network expansion and fare reductions. This is expected to drive a growth in patronage of between 15 and 34 per cent by 2026/27.^{vi} Similar outcomes can be expected in Wales, with sufficient funding and the right framework in place.

Rail reform

With rail services in Wales (and across the border into England as far as Birmingham) now controlled by the Welsh government, a greater opportunity exists to make improvements to the rail offer to passengers.

There are however limitations on the scope for improvements in rail compared to bus. Most obviously train services in the medium term can only be improved over existing tracks and routes, whereas buses can penetrate new areas. Rail services are in the medium term limited to existing rolling stock and overwhelmingly diesel operation, whereas diesel buses can be, and are being replaced by hybrid and increasingly by zero emission alternatives.

A further restriction is that infrastructure matters remain in the hands of Network Rail, and so outside the direct control of the Welsh government. We would like to see the Welsh government given a greater handle on this, including decisions relating to infrastructure investment. We do not believe Wales to date has had a fair share of rail investment. The fact that until recently there was not a single mile of electrified railway anywhere in Wales demonstrates this all too clearly. We believe the new organisation Great British Railways should recognise this and respond appropriately.

It is accepted that rail is the greenest form of transport, but it would be wrong for the industry to rest on its laurels. It too must make its contribution to the reduction in carbon emissions. A sustained programme of electrification of key routes is needed, for example from Cardiff to Swansea, but also the introduction of battery or hydrogen trains where electrification is not economically viable.

As referred to above, there is not the ability to apply agility to rail that applies to bus, but one area where this does exist, and which can make a real difference is in fares and ticketing.

Rail fares saw the biggest annual increase in nice years this March. With high levels of inflation at the moment, if RPI is maintained as the normal base to decide rail fares, we could be looking at an increase above ten per cent next year. We hope that the success of the recent Great British Rail Sale would persuade HM Treasury that lower rail fares actually serves to attract more passengers to trains and therefore generate more revenue overall, and that the way for the Treasury to increase its income is to cut fares, not keep ratcheting them up, which can only drive more people into their cars.

Some ticket types are protected by law and while many protections are beneficial, the law must not be an inhibitor to beneficial change. For example, the protected cheap day return effectively means that a single journey between the same two points at the same time costs the same. This is not sensible. We also need to recognise that in the new post-franchise world, a great deal of simplification and rationalisation can and should take place. There are at present, for example, more than 130 different tickets for the Liverpool-Manchester journey alone, not counting railcard or child discounts. The UK government must use the forthcoming legislation which will establish GBR to unfreeze unhelpful rigidity in the fares and ticketing landscape

We have been calling for a root-and-branch reform of rail fares and ticketing, including the introduction of single leg pricing for rail journeys, action to lessen the difference between peak and off-peak rail fares and a much-improved flexible season rail ticket offer. We have been working closely with the Great British Rail Transition Team and train operating companies in this regard. Our desired outcome is one ticket for one journey, including if this requires a change between train and bus, for all payments to be contactless, and for fares overall to be reduced to attract people out of their cars.

Thank you for considering Campaign for Better Transport's views and I look forward to discussing these points further in the committee meeting.

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ⁱ Nicholas, K. (14 April 2022), "12 best ways to get cars out of cities – ranked by new research", The Conversation, <https://theconversation.com/12-best-ways-to-get-cars-out-of-cities-ranked-by-new-research-180642>

ⁱⁱ Transport Focus, Travel during Covid-19 survey, weekly series, <https://www.transportfocus.org.uk/home/coronavirus-latest/coronavirus-insight/>

ⁱⁱⁱ <https://the-way-forward.org/>

^{iv} Department for Transport Statistics, Table TSGB1308, <https://www.gov.uk/government/statistical-data-sets/transport-expenditure-tsgb13>

^v Department for Transport Statistics, Table BUS0206, <https://www.gov.uk/government/statistical-data-sets/bus02-vehicle-distance-travelled>

^{vi} Urban Transport Group (September 2021), Back the Bus to Level Up: The case for bus revenue funding and reform of how it is provided, <https://www.urbantransportgroup.org/system/files/general-docs/Bus%20revenue%20funding%20case%202021%20FINAL.pdf>

Transport Focus evidence outline based on our extensive research

1. Priorities for post covid recovery for Welsh bus and rail

- Punctual and reliable services with faster journey times and onboard cleanliness
- Cheaper, simpler fares, ticket discounts and loyalty schemes
- Campaigns to try out transport.

2. The action required to achieve Welsh Government targets for modal shift to these modes and behaviour change

- Delivery of pre-existing commitments and investment to improve punctuality, reliability, value for money fares, flexible tickets and customer-facing staff particularly to provide support during disruption
- Incentives to get out of cars – more sustainable choices made cheaper and more readily available than alternatives
- Action to address congestion
- Integrated services – joined-up door-to-door provision including active travel
- Easier access to the network – geographic reach, time-wise and for disabilities.

3. Views on proposals for bus and rail reform – including UK Government plans to reform the rail industry, and Welsh Governments plans for regulation of bus services / the Bus White Paper

- Fundamentally, key barriers to travel need to be addressed: cost, convenience and complexity.

Rail reform

- Ensuring the new railway is based around the needs of passengers – important that this is now followed through in design, actions and metrics
- Need for passenger-centric targets: punctuality, cancellations, service quality
- Essential to continue investing in fleet and network improvement with continuity and stability of the investment pipeline
- Need for more cohesive approach across track, train and stations
- Essential that implementation across both sides of the border is scrutinised and harmonised.

Buses White Paper

- Regardless of structure, transport needs to deliver fundamentals for passengers:
 - Buses running more often and going to more places
 - More buses on time with faster journey times
 - Better value for money
 - More effort to tackle any anti-social behaviour
 - Better quality of information at bus stops
 - Accessible and cleaner buses
- Need for better-targeted indicators and passenger charter
- Accountability to passengers.

Pwyllgor Newid Hinsawdd, yr Amgylchedd a Seilwaith / Climate Change, Environment and Infrastructure Committee

Teithio ar fysiau a'r rheilffordd yng Nghymru / Bus and rail transport in Wales

BRT07

Ymateb gan / Evidence from Transform Cymru



About Transform Cymru

Transform Cymru is a coalition of organisations passionate about connecting people and places across Wales in a sustainable and inclusive way.

Our vision is for a sustainable, affordable, inclusive and safe transport network for Wales which meets the needs of all passengers regardless of background or ability.

For further information about this response please contact Joe Rossiter, Policy and External Affairs Manager Sustrans Cymru and Transform Cymru representative at: joe.rossiter@sustrans.org.uk

Priorities for post covid recovery for Welsh bus and rail

Transform Cymru want to see Welsh bus and rail services that are accessible, affordable and integrated with other sustainable modes of transport. Transform Cymru is strongly supports a thriving and growing pattern of bus and rail usage in Wales and is concerned about the pattern of decline.

Covid-19 has had a seismic impact on public transport in Wales, rail and bus services have been reduced, particularly on rural routes which were already at risk. We have seen a 73% drop in bus journeys made in Wales between January and March 2021 compared to the previous year. We have also seen bus vehicle numbers fall by [17.8% since 2010](#). Similarly, rail passenger journeys dropped from 31.8 million in 2019/20 to 5 million in 2020-21, these are huge shifts. This has left, according to [Oxfam Cymru](#), 12% of people without any public transport links in their local area. Even when services are present, they are not always accessible; half of rail station in Wales are not fully accessible to disabled people, with [34% having no access for wheelchair users](#). Consequently, bus and rail services are not fit for purpose in Wales today.

We have seen the understandable disincentivization of public transport during Covid and whilst Welsh Government were more positive about public transport, the message has remained that this is for essential journeys only. This has impacted the financial sustainability of transport services and we have seen services reduced during Covid and the routes and services that were already struggling, may be lost permanently. Any reform of bus and rail must be aware of the impact of Covid on travel patterns, but importantly, must incentivize getting users back on their services. This requires commitment and investment in behavioural change.

The key priority for post covid recovery bus and rail services are that they should be local, regular and enable people to access the services they need to live happy, healthy lives. Individuals will be more likely to see public transport as a viable, convenient option if they live within a short walk of a station or stop, the waiting times at the nearest station or stops are short and that multiple services serve a variety of locations pass the nearest stations or stops. Currently, having a service doesn't guarantee access to the things people need; variation between weekday and weekend services, services that stop early in the evening, a lack of stops in key places meaning people have to be able to walk to their destination, failure to integrate effectively with other modes of travel, including active travel, a requirements to go through an urban centre to reach the other side, and lack of frequency of service can all form barriers to viable use. Travel should enable easy access to work, access to learning, access to healthcare and other services, access to shops, social, cultural and sporting activities.

We also think that services should prioritise personal safety. Personal safety issues are a significant barrier to women's full use of public space. An estimated 81% of women have experienced street harassment. It is also especially severe among women who do not work the traditional nine-to-five weekday pattern and are therefore more likely to travel in darkness. Personal safety is not just an issue for women and many other groups experience similar issues, especially disadvantaged or marginalised groups, for example children, disabled people, people from minority ethnic groups, LGBTQ+, older people and people living in deprivation or from multiple-deprived communities.

Bus and rail services must also prioritise on working for those that most need it. In Sustrans Cymru's recent report on the issue of transport poverty, [Making the Connection](#), highlights how living in a state of transport poverty is a widespread experience in Wales today. We must ensure that public transport services act to alleviate all wider societal inequalities. Without an explicit and strategic plan for how these services will tackle inequalities, they will fail to do so.

It is vital that we get passengers back on to public transport for social, environmental and economic reasons. To ensure that transport is available for those who need it the most, services must either be profitable or subsidised as a public service. The Government's target for modal shift is 45% by 2040. This is not a shift to electric cars but away from cars and towards active travel and public transport. Without fit-for-purpose bus and rail services, which complement active modes of travel, we will not come close to hitting these targets.

The action required to achieve Welsh Government targets for modal shift to these modes and behaviour change

We should first acknowledge that it is welcomed that Welsh Government have such ambitious targets on active travel and on modal shift particularly, pledging in Llwybr Newydd that “we have set a target of 45% of journeys to be made by public transport, walking and cycling by 2040,” an estimated increase of 13% on the current mode share of 32%.

In order to bring these ambitious targets to reality, we need to see serious, coordinated action to shift people from the car to active travel and public transport. This needs to involve both proactive incentives for travelling more sustainably, e.g. better active travel infrastructure, cheaper public transport, but also disincentives, mechanisms which make it harder to drive in comparison to more sustainable modes.

A significant weakness in the bus and rail sector in Wales is its lack of integration with other modes. Too many barriers are placed in the way of people looking to walk, wheel or cycle to and from rail and bus services as part of a multi-modal journey. We want to see services that encourage people to travel in the most sustainable way possible, yet, currently we disincentivize people from doing so by making it easier to travel to public transport services by private car. So, bus or rail services, which may take a user most of the way in their journey, must be integrated with safe, comfortable, accessible walking, wheeling and cycling provision at the bus stop or rail station. This means in practice; secure cycle storage, integration with bus and rail timetabling, reliable services that arrive on time, the ability to travel on bus or train with a cycle on board, an integrated ticketing approach. Without this serious commitment to integrating services, the most sustainable transport modes will not be attractive options for those that seek to use busses or trains as part of their journeys.

A by-product of the cost of living crisis is that we are seeing the costs of running a car significantly growing, in the last few months according to the [RAC](#), since January 2021 we have seen over a 20% rise in running a car. This is bringing it closer to the costs of travelling by rail or by bus and coach – however we have seen rail and bus fares far outstrip average wages over the past ten years. Bringing them closer to parity. Bus and rail need to be seen as affordable options and genuine, reliable alternatives for people across all incomes.

We also think it is important for there to be an analysis of what public transport links bring to local economies across Wales. The public only see the costs of putting services on, not what the wider economic impact of these services are. We think there needs to be a more thorough conception of the economic and wellbeing impact of public transport services, to better make the case to communities of their benefits and value. This would also help to make the case for the level of public sector spending that will be required to deliver public transport services that are attractive to all.

Views on proposals for bus and rail reform – including UK Government plans to reform the rail industry, and Welsh Governments plans for regulation of bus services / the Bus White Paper

Wales Bus reform

We strongly agree that change is required in the delivery of bus services to meet the needs of Wales's citizens and to respond to the climate emergency. We are also supportive of the vision of bus service which is a fully integrated network across Wales that put community need at the forefront. We are also supportive of the principle that Welsh Government, Transport for Wales and Local Government are in the best position to design services which meet the needs of communities across Wales. This franchising model in principle should act to ensure that bus services are aligned with Welsh Government's intentions to use the bus service as a means to promote modal shift, to tackle inequality and combat the climate emergency, all of which require wholesale and urgent reform.

Government support for bus services has declined by 19% in the decade up to 2019. Rather than being driven by profit, we believe that the maintenance and development of our transport system should be driven by its role as a public service.

We are delighted to see that the goals for the bus reform are to "boost social equity" and effectively "delivering the scale of modal shift required by the climate emergency". These are amicable goals that represent transport's key role in either perpetuating or alleviating wider societal inequalities. However, from current plans it is unclear how this will be achieved. There is no provision for data collection or efforts to understand who uses the buses and what for. Without having a clear set of targets and data to back this up, it is unclear how the bus reforms will result in use by the very people who need to use them, like people in low-income households for example.

We now need to see a clear, ambitious timetable for investing in bus services across Wales, with a sustainable financial investment required to go alongside the plans.

UK Rail reforms

We have seen decades of underfunding for Wales's rail network from the UK, as evidenced by [Wales Fiscal Analysis](#) (2021) which displayed how Wales disproportionately receiving less funding for its percentage of UK tracks. We therefore think that, broadly speaking, Wales requires its share of infrastructure spending to connect all parts of Wales by rail that is affordable, accessible and useable for all.

In Wales, we need to see action to increase its value for money and improve the performance, reliability and convenience of rail. One way to make rail travel better value for money is to enable more people to easily access the network by foot or by cycle, both of which are low cost and complimentary to active travel. The convenience of rail is also enhanced by making it easier for people to walk, wheel and cycle to a station. Practically this means, making safer routes to/within stations, increasing the availability of safe cycle storage, improving the space and ease of use of that space for taking a cycle on a train.

Agenda Item 4

Pwyllgor Newid Hinsawdd, yr Amgylchedd a Seilwaith /
Climate Change, Environment and Infrastructure Committee
Teithio ar fysiau a'r rheilffordd yng Nghymru / Bus and rail transport in Wales
BRT02

Ymateb gan Cymdeithas Cludiant Cymunedol / Evidence from Community Transport
Association

Integrated, accessible and sustainable transport, that works for everyone

The Community Transport Association (CTA) works alongside more than 100 Community Transport (CT) operators across Wales and champions accessible, inclusive and sustainable transport for all. We welcome the opportunity to respond to the Climate Change, Environment and Infrastructure Committee's call for views on bus and rail reform in Wales.

The key points of our submission are:

- Welsh Government should continue to work in partnership with CTA and the CT sector to develop services that are accessible, inclusive, connected, and address transport poverty, due to our community-led knowledge and expertise which can directly influence the delivery of transport as a true public service.
- Community transport offers substantial added value to passengers, and this should be recognised when designing or commissioning new delivery models, contracts or franchise agreements.
- The CT sector in Wales has significant untapped potential, and appetite to deliver a wider range of zero emission transport services that will facilitate modal shift by helping citizens connect with their communities in new ways.
- The CT sector must be included in the national investment programme to deliver a net zero public transport system for Wales.

We support the Welsh Government's ambition, enshrined in Llwybr Newydd, of encouraging people to walk and cycle more, and to use shared and public transport options over private transport modes to address the climate emergency, provide equality of access, and help improve the health of the nation. We especially welcome the growing recognition that transport is a social justice issue, as accessible and affordable transport can have a significant positive impact on people's lives and life-chances, enabling them to access education, employment, health services, social and leisure opportunities.

As things stand at present, right now in Wales we have a disconnected, expensive and often inaccessible public transport network, leading to:

- Transport poverty

- Loneliness and isolation
- Access and inclusion barriers.

The community transport sector already makes a substantial contribution to tackling these issues, offering innovative shared transport options that affordably meet a wide range of passenger needs, embracing new technology and showcasing different ownership models to enable citizens to shift away from private vehicles. CTA members and the wider community transport operator network in Wales have welcomed the opportunity to work alongside Welsh Government Ministers and officials to deliver a better, more affordable, more integrated local passenger transport network that can meet the needs of **all** passengers and be the first and best choice for making a journey. This will have positive benefits for citizens, our communities and our environment.

Llandysul a Phont Tyweli Ymlaen Cyf is a registered charity providing affordable and accessible transport to individuals, organisations and groups within the counties of Carmarthen and Ceredigion. They encourage a grass-roots approach to developing transport solutions which help communities feel less isolated, better connected and with improved access to local services, facilities and opportunities. It recently pressed on with plans to expand the use of electric vehicles – seeing this as a great way to bring down costs for passengers.

‘Just as an example,’ Rod Bowen, Community Transport Development Officer, says, ‘a passenger previously might have had to pay £86 for a taxi to Cardigan. Through capital funding from the Welsh Government (ULEV Transformation Fund) to buy electric vehicles, we’ve been able to get the cost of the same journey down to £13. As well as reducing the operational cost, those vehicles will be an asset that resides in the local community or at a community hub, for a decade.

‘Over the last 12 months we have put 6 electric vehicles into different areas – demand is growing by over 100% on a weekly basis because people haven’t been able to access bus services. Using electric vehicles makes journeys much more affordable for passengers as we are able to pass on the operational cost savings – helping to address transport poverty. Our communities are crying out for these types of services.’

1. Access & Inclusion

If we want everybody to be able to access an integrated and sustainable public transport network and facilitate modal shift, we need to see every passenger or prospective passenger as someone of value. Whatever the reasons for their journey, their mobility support needs, their preferred journey time, or their income bracket, they need to see the public transport network as a viable and accessible option.

One of **Green Dragon’s** regular passengers, who lives on the border of Pembrokeshire and Carmarthenshire and has mobility support needs and a guide dog, has a sister living in Shrewsbury. She’s confident the community transport provider will be able to pick her up at home and take her to the train station, but she’s afraid that when she gets to the station the member of staff supposed to meet her to help her get on the train won’t be there, and that she won’t get the support she needs to

disembark when she arrives at her destination. She told us that she has experienced these barriers often when trying to use the train, and now she is older and less confident after so long shielding at home, that she is avoiding visiting her sister at all, leaving them both more isolated and disconnected.

Disabled people in the UK make 38% fewer journeys every year than non-disabled people due to inaccessible transport. Investing in accessible, inclusive services delivered by community transport which can then integrate with the wider public transport network will ensure disabled people are not left behind in the transition to net zero. Similarly, with nearly a third of the Welsh population aged over 60, investing in an integrated, accessible and supportive transport network will make a substantial contribution to making Wales the best place in the world to grow older.

The infrastructure and vehicle fleet involved in delivering transport services – including any new stations, interchanges, vehicles, or multi-modal transport hubs – need to be designed and delivered to the highest standards of accessibility. Transport for Wales, Network Rail and Welsh Government should seek out the expert advice of third sector support agencies such as Disability Wales, RNIB, and Transport for All, and directly from those with lived expertise, to ensure an ambitious timetable of access improvements is developed and implemented. This should also include a review and upgrade of how information is provided, in partnership with organisations such as Learning Disability Wales and RNID.

We should ensure that everyone involved in developing and delivering public transport services has a basic level of disability equality training – delivered by disabled people – so that operators understand what it takes to support someone with dignity and safety, to use the public transport system in a way that works for them. If public transport is truly to return to being a Welsh public service and become the first and best choice for making a journey, then as per Llwybr Newydd’s Equalities pathway **every passenger’s value needs to be recognised** and access barriers removed.

A key strength of the community transport sector is its ground up approach to the provision of transport. It has deep roots in the local community and provides people-led services that address a wide range of needs. Any Action Plan or policy measures considering the need for long-term systemic and structural changes required for a fairer, more equitable society, should include capacity-building support for local communities to develop their own needs-led and community-owned accessible transport solutions. The CTA would be a fully supportive and proactive partner in any such capacity-building, and this work has already started through our role as lead partner for delivery of the Third Sector Mini Plan in Llwybr Newydd.

2. Transport Poverty

A lack of transport, or poor quality and inaccessible transport, can impact negatively on an individual’s quality of life, their economic and social opportunities, and the type of activities they can engage in. To this end, transport poverty can reinforce exclusion from mainstream society, across a whole range of areas – employment, education, health, and social and cultural activities.

Reliable, high quality, affordable and accessible transport services are an integral part of the essential ‘gateway infrastructure’ that underpins social inclusion¹. The introduction of the Wales Transport Strategy Llwybr Newydd, by the Welsh Government in 2021, is a key milestone as it enshrines the principle that ‘equality is integrated into transport planning at the highest level rather than seen as a separate issue.’

CTA fully supports Welsh Government’s aspirations to streamline and integrate ticketing across transport modes, as we believe this will be easier for passengers to navigate, increase the attractiveness of public transport, and result in cost savings for passengers using the network. Tackling transport poverty requires a much wider range of measures however, and we welcome the opportunity to work alongside Welsh Government, Transport for Wales and commercial operators to develop opportunities that align with the Equalities and Rural pathways of Llwybr Newydd as well as those emerging through the development of the Third Sector Mini Plan.

Fair access to work was a significant theme within Welsh Government’s recent Cost of Living summit² and, together with the Welsh Government’s recent announcement of a Basic Income pilot for care leavers across Wales, highlights the need for community transport options that support people, including younger people who do not have the financial means to purchase a vehicle, to get to places of employment that may not be well served by bus routes or where the timetabling of bus services does not match shift patterns.

Transport is undoubtedly a key factor in shaping people’s experiences of poverty as, without access to transport, people report diminished job opportunities or constraints on their job search horizons. The community transport sector can, and does, assist people to access employment through its demand responsive transport services, specifically funded employment services, and schemes such as ‘Wheels to Work’. The CT sector is also an attractive field for those seeking work or volunteering opportunities, and a green recovery could be further enhanced by this being developed through supported work placements, funded traineeships and investment in connected fields such as vehicle maintenance to support the green CT fleet of cars, minibuses, mopeds and electric bikes.

Inclusivity is the central and most fundamental value within the community transport sector – it is based on the underlying principle that no-one within a community should be excluded from access to services or amenities because of a lack of appropriate transport and is also why Community Transport remains distinctive from commercial operators. It is a values-driven, needs-based, community-led approach to service planning and delivery, and should therefore be viewed as a lynchpin of a transport infrastructure aiming to be socially equitable, and of any policies and measures aimed at addressing transport poverty.

¹Campaign to End Loneliness https://www.campaigntoendloneliness.org/wp-content/uploads/Promising_Approaches_Revisited_FULL_REPORT.pdf

² <https://gov.wales/written-statement-cost-living-summit>

3. Sustainable Integration & Connectivity

Our members welcome the opportunity to work alongside Welsh Government and Transport for Wales in the plans to develop a network of bus services that are integrated, accessible, affordable, flexible, and low carbon, as set out in the white paper consultation ‘One network, one timetable, one ticket’³. The community transport sector has continued to grow at a time when conventional public transport has contracted, and has found innovative solutions to community problems during the pandemic which continue to enhance communities as we move into the recovery phase. Moreover, these community-focused services directly improve the wellbeing of people who use this form of passenger transport, making community transport integral to the conversation about Wales’ future passenger transport.

We welcome the proposed creation of more innovative and flexible services, particularly in geographic ‘hotspots’ where commercial transport options have retracted or been withdrawn, leaving individuals and communities disconnected. Community transport operators need to be considered as potential partners for new fflexsi and other demand-responsive services, and supported to deliver these services to their full potential. The value people place on their journey with a community transport service is very different to the value placed on public transport journeys. It is important to consider the added social benefit, value, and wraparound support provided when community transport operators run fflexsi or community bus services, and this should be considered as part of the cost/quality matrix used to award any new franchise or contract agreements.

The CT sector in Wales has significant untapped potential, and appetite to deliver a wider range of transport services that will help citizens meet their needs and connect with their communities. In order to deliver on Welsh Government’s aspirations for fully integrated transport options, the sector will need additional support around investment in real time information, journey planning, and mobility as a service (MaaS), if they are to achieve parity with commercial operators and funded pilot schemes.

There is also a significant opportunity for the community transport sector to shape, influence and potentially deliver a wider range of shared transport options, in partnership with communities, local councils, housing associations, and other third sector organisations, and tapping into opportunities to generate, store and use community owned renewable energy to power sustainable vehicles. These shared car, bike, and e-cargo bike schemes could be delivered/supported by the CT network in Wales, to integrate with other transport modes and open up opportunities for modal shift for local residents and tourists visiting different parts of Wales.

Having access to a network of accessible ‘lifeline’ provision which is consistent across Wales, bringing citizens from outlying towns and villages to multimodal transport hubs, will improve connections and eliminate the postcode lottery for both public and community transport. There are significant opportunities presented by the proposed franchising model to ensure CT operators with local knowledge and expertise and a passion for delivering community-led innovation to be an active

³ <https://gov.wales/one-network-one-timetable-one-ticket-planning-buses-public-service-wales>

partner in delivering many of these services, with agile demand-responsive services that interface with more commercial routes, active travel modes and shared transport such as community car clubs.

The community transport sector must be included in the national investment programme to convert the passenger transport fleet to zero emission. The sector has been struggling to update fleets due to insecurity of funding (for example, the one-year Bus Service Support Grant, which has been static for nearly a decade and is now split among more operators than ever before) and lack of organisational reserves for capital purchases, which have been further decimated due to Covid-19. It is not unusual for operators to have vehicles over 10 years old, with over 200,000 miles on the clock, and whilst they are committed to transitioning to electric vehicles, the higher capital costs of such vehicles hinders the move to low carbon transport. The recognition by Welsh Government of the need to invest in its communities is welcomed, as this growing passenger transport sector requires support to fund the conversion to zero emission vehicles.

EV charging infrastructure needs to consider community transport operators delivering key services including S22 services or school transport and provide access to the network of rapid EVCPs. Converting the community transport fleet to a zero emission fleet, and ensuring the EV charging infrastructure supports this transition and is accessible to the CT sector, will require a partnership approach between Welsh Government, the community transport sector and other organisations.

The **Western Valleys Transport Pilot** has been funded through Welsh Government's Household Support Fund to support people to access employment, education, training, support and leisure opportunities through a range of sustainable and active travel modes, while improving cross-valley connectivity through the development and improvement of community owned energy generation and non-commercial and accessible EV infrastructure.

This project will be coproduced by CT operators and the communities they serve to connect and integrate with existing schemes, the mainstream public transport network and key sites across south Wales, including employers, schools, social housing, leisure facilities and community centres. Community-owned assets including energy generation and storage, minibuses, bikes, and accessible cars will be based in the heart of communities typically excluded from such high-profile projects, to facilitate transport connections that eliminate access barriers and bring people together. The project is planned to launch in June 2022 and will provide invaluable learning to support the ongoing transformation of the public transport network in Wales.

6. Conclusion

It's a really exciting time for the transport sector in Wales, and CTA, our members and the wider CT network have a clear vision of what we want to achieve. We want to see sustainable funding going


into public and community transport which also considers how active travel can be integrated for those able to use it. A decarbonised fleet, connected with communities who own the energy that powers a range of vehicles, and are part of a Wales-wide network of operators who collaborate to share their learning and expertise. We want to see members of the community shape the services they use, through employment in the network, volunteering on the ground, coproducing new services and as part of trustee boards, so those services can adapt and evolve to ensure they continue to meet the needs of their community. And we want to see recognition from across the public sector that accessible transport can be a key enabler for success, and consider it when commissioning services, establishing franchises, and planning all forthcoming projects such as new health centres, city centre redevelopments, and regeneration schemes.

Overall, our vision is for a community transport sector that has been supported to achieve its full potential, and is properly valued and recognised as an essential part of an integrated and sustainable transport network. We believe that this can be instrumental in supporting a just and green recovery as we navigate a 'post-Covid' world, both now and for future generations.

Contact

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A large, stylized arrow graphic pointing to the right, composed of several overlapping teal and blue shapes.

Pwyllgor Newid Hinsawdd, yr Amgylchedd a Seilwaith /
Climate Change, Environment and Infrastructure Committee
Teithio ar fysiau a'r rheilffordd yng Nghymru / Bus and rail transport in Wales
BRT03
Ymateb gan Cydffederasiwn Cludwyr Teithwyr Cymru /
Evidence from Confederation of Passenger Transport Cymru

Introduction

CPT Cymru Welcomes the opportunity to give evidence to the Senedd's Climate Change Committee on the future of bus and rail transport in Wales. It's a critical time for the sector as we look to recover from Covid-19 against a backdrop of significant pressures on operating costs and a proposed restructure of the regulatory regime for buses in Wales.

This paper provides a brief synopsis of our views on the issues identified by the Committee. In relation to the bus white paper in particular, our views are still being formed with consultation with our members ongoing. Therefore, the views presented here are indicative only and subject to change. CPT Cymru looks forward to engaging with the Committee as it scrutinises the proposals going forward.

Priorities for post-covid recovery for Welsh bus and rail

The recovery from Covid-19 in the bus sector is still fragile. At present, patronage varies between operators and regions of Wales but in general it is around 30-35% below its pre-covid level. This presents a serious challenge for the bus network going forward with fare revenue unlikely to cover operating costs without a significant change of passenger behaviour towards returning to bus.

This is particularly acute for those passengers that are typically eligible for the Mandatory Concessionary Fare scheme (MCF) where passenger levels are considerably lower. There are a number of reasons for this such as individuals remaining concerned around being vulnerable to serious covid infection and much lower commuting flows as a result of greater working from home.

Our suggestions for government actions would be as following:

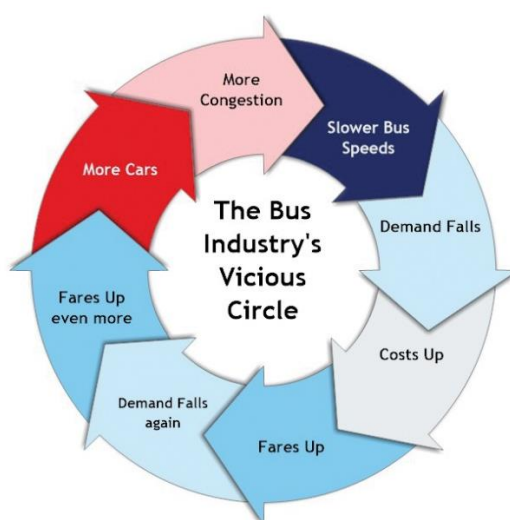
- **Urgently clarify funding arrangements beyond the current BES 2 scheme which ends in July 2022.** Welsh Government has suggested a BES 3 will be created to support bus networks, but the detail on this is yet to be shared with operators. Without such support, it is likely operators would have to cut frequencies or networks to cover the costs of operation.
- **Make clear public statements to demonstrate travel by public transport is safe.** This is particularly important for encouraging the return of concessionary pass holders who are likely to continue to have concerns around their safety. Ministers could demonstrate this by being seen to use the bus themselves.
- **Redouble efforts to communicate bus as a mode of transport.** Transport for Wales has an active campaign running called 'the real social network'. It's important that this work is continued, and operators are involved to maximise its impact. As staff return to offices a strong message encouraging the use of public transport to support the commute will be important.

The action required to achieve Welsh Government targets for modal shift and behaviour change

Welsh Government has set ambitious modal shift targets that will be very difficult to achieve without concerted action. For bus in particular, there are two ways to make this happen; firstly, through measures to make the bus more attractive and second by reducing the attractiveness of cars.

Bus services do not exist in a vacuum. Many of the reasons passenger numbers have declined since the 1950s relate to issues outside of the direct control of the bus network. Indeed, research by KPMG in Scotland suggests this accounts for 75% of the decline in passenger numbers historically.¹

For instance, rising car ownership has been perhaps the most substantial, along with significant increases in congestion which has made bus services more expensive to operate, slower to get to destinations and less reliable for passengers.



We call this the bus industry's 'vicious circle' and tackling it is going to be key to engendering modal shift and achieving Welsh Government's ambitious targets.

In order to reverse the circle and make it a positive one, Welsh Government needs to undertake the following actions:

- **Invest in meaningful bus priority measures and tackle congestion** – bus priority measures such as bus lanes make a significant impact on journey times, reducing operating costs and improving journey speeds. Wales has little in the way of funds to support local authorities to undertake this activity – in comparison to the Scottish Government's £500m Bus Partnership Fund. This is despite CPT Cymru research highlighting that 61% of the Welsh public support introducing bus priority measures (higher than any other UK nation).
- **Discourage car use** – bus as a mode of transport is in direct competition with private vehicles. Reducing car reliance and car dependency has a significant impact on modal shift. There is a spectrum of measures Welsh Government can take in this respect, from increasing parking charges, reducing availability of parking spaces or introducing Workplace Parking Levies similar to the one in Nottingham. Another

¹ Trends in Scottish Bus Patronage, KPMG, 2017

consideration could be road user and congestion charging, which has significant potential to drive change.

- **Support the sector to transition to zero-emission buses (ZEBs)** – Welsh Government has no support available to operators in Wales to help the transition towards electric vehicles, despite similar schemes being available in Scotland and England for several years. Apart from Cardiff Bus and Newport Transport who secured funding from a previous DfT scheme for ZEBs, little progress has been made in Wales despite targets for half the fleet to be replaced by 2028.

Views on proposals for bus and rail reform

The Welsh Government's white paper *One Network, One Timetable, One Ticket* is currently out to consultation with a deadline for the 24th June. CPT Cymru will be engaging with our membership during the consultation period to formulate our views. We are therefore not in a position yet to provide an overarching response for the Committee's benefit. However, the following considerations should be examined further by the Committee:

1) What is the timetable for the reform?

The white paper doesn't currently specify a timeline for the implementation of the new regime. This is a critical issue because operators typically need to make investment decisions over a long time horizon – for instance buses usually have a life of between 12-15 years. Without certainty over future arrangements, operators will find it difficult to invest and we therefore could see an investment gap and services that deteriorate. This is particularly important if we are to meet Welsh Government's target of half the bus fleet electrified by 2028. Welsh Government should publish a clear timeline, with measures to help maintain investment in the intervening period.

2) How much will the proposals cost?

Franchising regimes can be expensive to operate compared to the current commercial model. This is because new functions have to be created to deliver services, such as the capacity to plan networks, run tender exercises and monitor and audit performance of operators. At present, this expertise sits with operators and the public sector relies on consultants to undertake short-term projects. For operators too, costs can rise because of the cost of tender process and the need to pursue different models of fleet ownership such as vehicle leasing.

The white paper is silent on these matters; however, our own research suggests a franchise regime will cost £61m per year more and that doesn't factor in Welsh Government's ambitions for a zero-emission fleet by 2035. Welsh Government's regulatory impact assessment isn't clear on this matter but does include an additional £125m in costs for local authorities. Without certainty on annual or multi-annual funding settlements and clarity on how they will be funded, the franchising regime may have to cut services or raise fares to cover its costs.

3) Who will be responsible for designing the bus network?

The white paper proposes reviewing the governance of buses for Wales by creating a 'guiding mind' made up of various partners such as local authorities, operators and staff representatives. It also gives a direct role for Welsh Ministers, Transport for Wales, Corporate Joint Committees and local authorities in designing networks.



Whilst it is essential that there is a broad consultation on any proposed bus networks, it is important that a single organisation is the driving force behind the plans, otherwise there is a risk of too many tiers of government complicating matters. If it is ultimately Welsh Ministers that are to set networks, the white paper should be clear that this is a centralisation of policy responsibility around bus services and the local authority role will be limited.

4) What can passengers expect to change as a result of the white paper?

Introducing a franchise regime will change who is responsible for the bus network – with decisions shifting from bus operators to the Welsh Government. But it will not change the fundamental economics of delivering a bus service. Hard choices will remain on the types of vehicles used, how frequent services are and how extensive the network can be within the existing funding envelope.

The white paper should give a clear steer to passengers on what types of service levels can be delivered under a franchising scheme, and crucially set out how this differs from the current model of delivery.

5) How will the proposals deliver an increase in people using the bus?

The regulatory model for bus services is an important issue. However, bus services do not exist in a vacuum. Many of the reasons passenger numbers have declined since the 1950s relate to issues outside of the direct control of the bus network. For instance, rising car ownership has been perhaps the most substantial, along with significant increases in congestion which has made bus services more expensive to operate, slower to get to destinations and less reliable for passengers.

We call this the bus industry's 'vicious circle' and tackling it is going to be key to engendering modal shift and achieving Welsh Government's ambitious targets. Tackling these issues will require measures to reduce congestion for buses and to increase the costs of using a private vehicle – none of which are addressed by the white paper.

About CPT

We help a dynamic bus and coach industry to provide better journeys for all, creating greener communities and delivering economic growth. We do this by representing around 900 members from across the UK be they large or small, bus or coach, operator or supplier.

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Agenda Item 5.1

Pwyllgor Newid Hinsawdd, yr Amgylchedd a Seilwaith /
Climate Change, Environment and Infrastructure Committee

Teithio ar fysiau a'r rheilffordd yng Nghymru / Bus and rail transport in Wales
BRT06

Ymateb gan Tim Peppin, Cyfarwyddwr Materion Adfywio a Datblygu Cynaladwy -
Cymdeithas Llywodraeth Leol Cymru (CLILC)- ymateb swyddogion yn unig/
Evidence from Tim Peppin, Director of Regeneration and Sustainable Development,
Welsh Local Government Association (WLGA) – officer response only

WLGA Evidence: Bus and Rail Transport in Wales inquiry

9th May 2022

Tim Peppin

tim.peppin@wlga.gov.uk

Welsh Local Government Association - The Voice of Welsh Councils

The Welsh Local Government Association (WLGA); is a politically led cross party organisation that seeks to give local government a strong voice at a national level. The Association represents the interests of local government and promotes local democracy in Wales. The 22 councils in Wales are all members of the WLGA and the 3 fire and rescue authorities and 3 national park authorities are associate members.

We believe that the ideas that change people's lives, happen locally

Communities are at their best when they feel connected to their councils through local democracy. By championing, facilitating, and achieving these connections, we can build a vibrant local democracy that allows sustainable communities to thrive.

The main aim of the Association is to promote, protect, support and develop democratic local government and the interests of councils in Wales.

This means:

- Promoting the role and prominence of councillors and council leaders
- Ensuring maximum local discretion in legislation or statutory guidance
- Championing and securing long-term and sustainable funding for councils
- Promoting sector-led improvement
- Encouraging a vibrant local democracy, promoting greater diversity
- Supporting councils to effectively manage their workforce.

Introduction

1. The WLGA welcomes the opportunity to submit views in response to the Climate Change Environment and Infrastructure committee's call for evidence for its inquiry into bus and rail travel in Wales. Given the timing, it is an officer response drawing on discussions with Members prior to the recent local government elections. The WLGA's political spokespersons will not be confirmed until the WLGA Annual General Meeting on 24th June. Therefore, the views expressed in this submission are subject to change.
2. Comments are provided below on each of the three main lines of inquiry.

"Mae'r ddogfen yma ar gael yn Gymraeg. This document is available in Welsh."



Priorities for post covid recovery for Welsh bus and rail

3. Covid-19 has had a devastating and long-lasting impact on rail and bus journeys in Wales. Restrictions on movement, the rapid expansion of working from home and ongoing fears about travelling in a confined, shared environment have all acted at times to deter people from using trains and buses. Welsh Government estimates that use of public transport overall declined by 95% in the early days of the pandemic compared to the same period the year before. Rail usage in the full year of 2020/21 was over three quarters lower than the previous year.
4. Whilst there has been some recovery over recent months, it has been slow and previous levels of usage have not been achieved. In April 2022 it was reported that bus journeys in Wales were only just over half their pre-pandemic level (12.1 million in the latest three-month period compared to 22.6m in the last three months of 2019). Without financial support from Welsh Government and local authorities many bus operators would not have survived. Similarly, Welsh Government took the decision to take rail services into public ownership with Transport for Wales acting as 'operator of last resort'.
5. The decline in patronage is doubly concerning for buses as, following a temporary boost from the introduction of concessionary passes back in 2002, passenger numbers reverted to steady decline again over the last decade. Rail passenger numbers, in contrast, had previously been growing in most parts of Wales.
6. Getting people back onto public transport and making best use of available capacity on bus and rail services is critical in terms of efforts to reduce and ultimately eliminate direct carbon emissions associated with transport. There are also important social benefits from sustaining a high quality and efficient public transport system. Around a quarter of households, including many people on low incomes, do not own a car and many older people rely heavily on public transport. Their quality of life would suffer if these services were allowed to continue in a downward spiral.
7. For these reasons, then, recovery of bus and rail service passenger numbers as a percentage of overall travel is vitally important in terms of 'building back better'. Priorities in this respect for bus and rail, including some that apply to both, are suggested in the table below. In terms of phasing, some of these can be progressed in the short term (e.g. publicity campaign) whereas others require long term funding commitments which would give a clear signal of intent to the travelling public (e.g. planned and continuous investment in the highway and rail networks).



Bus	Rail
Publicity campaign to encourage people back onto public transport generally, highlighting safety, environmental, economic and social benefits	
Short term incentives to encourage bus and rail use, such as reduced fare offers – prioritising trip substitution (e.g. targeting commuters) over additional trip generation (e.g. through tourism and leisure offers)	
Discussion with operators, unions and local authority transport officers to draw on their frontline experience and suggestions on steps that could be taken	
Ticket offers that recognise the impact of increased home working – e.g. reduced prices for multiple / season tickets that can be used over an extended period (as opposed to more restrictive offers based on regular weekly, monthly, annual travel patterns)	
Clarity over transport priorities: Support for electric vehicles and EV charging infrastructure versus promotion of active travel and public transport?	
Consideration of car scrappage schemes offering, in return, a period of free or heavily subsidised public transport travel (see e.g. West Midlands offers £3,000 'mobility credits' to scrap old cars - The Transport Network (transport-network.co.uk)0)	
Better integration between bus and rail services, where possible, with easily understood through-ticketing arrangements and integrated timetabling as well as linkages to active travel routes	
Investment in fleet/rolling stock to enable improvements in quality, reliability, safety and whole-life environmental performance of services	
Continued development of demand responsive transport, offering flexible public transport customised to meet individual needs	Consideration of extending concessionary fares to more rail journeys than currently included
Increased use of bus priority measures (including consideration of congestion / road user charging) in urban areas to reduce congestion and improve efficiency of bus networks	Investment in rail network, including electrification
Taking forward proposed bus legislation, informed by consultation feedback	Continued lobbying over HS2 consequential to enable additional investment within Wales



Action required to achieve Welsh Government targets for modal shift to these modes and behaviour change

8. The Welsh Government Transport Strategy, Llwybr Newydd, includes a target to increase the share of journeys undertaken by public transport and active travel from 32% to 45% by 2040. Substantial investment is going into active travel (rising from £5m to £75m during the Welsh Government’s current term of office) and an increase in walking and cycling will clearly have to play a significant role in displacing the car, especially for shorter journeys.
9. For those who cannot afford a car (let alone an electric car) or are unable to walk or cycle any substantial distance the bus (or a taxi) will continue to be the main alternative for most local journeys. Bus remains far more significant than rail in terms of numbers of passengers carried each year. Rail does provide an alternative for some relatively short journeys in those places fortunate to be served by railway lines and stations. Generally, though, rail offers a longer distance public transport option, along with some strategic bus routes such as those provided by TrawsCymru.
10. Notwithstanding pre-covid increases in rail use, attempts to encourage more people to shift their mode of travel from the car to public transport have struggled over many years to achieve significant change. Somewhere around 75-80% of commuters in Wales still use a car as their usual method of travel – a higher percentage than England or Scotland. By July 2020, car traffic in Wales had reached 80% of pre-lockdown levels whilst public transport usage has recovered to just 30% of previous levels.
11. Clearly, achieving major modal shift will be extremely challenging and will require a significant change in entrenched behaviour and social attitudes. For years, advertisers (and financiers) have encouraged (and enabled) people to strive for ‘bigger, better’ cars. The car someone drives still acts as a symbol of status in the eyes of many people.
12. Many of the actions suggested in the table above will need to be seriously considered and, indeed, most of them do feature somewhere in Llwybr Newydd. Increased recognition of the climate change emergency may help in taking them forward. More people (especially younger people) are recognising the personal responsibility to take action to help bring down greenhouse gas emissions. Changing attitudes to make travelling by public transport ‘the thing to do’, though, will require similar, high levels of sustained investment in public messaging. Getting that message right – stressing the importance for future generations – will be central to this. It will be important to avoid being ‘preachy’ but there is a need to set out choices clearly and the implications of these choices.
13. In this respect, steps to improve electric vehicle (EV) charging infrastructure in Wales could simply result in people (who can afford it, initially, and then as petrol and diesel cars are phased out) switching from internal combustion engine (ICE) cars to EVs. Whilst that will help to reduce tailpipe emissions, the overall impact



will depend on the extent to which the electricity used to charge EVs is from green sources. Furthermore, a straight switch from ICE to EV will do nothing to reduce congestion – one of the main factors slowing down bus journeys, increasing operators’ costs and impeding efforts to make travel by bus more attractive.

14. A ‘car scrappage for public transport credits’ scheme may be the ‘nudge’ needed to encourage people to re-evaluate and make a switch. Ensuring that good ‘end of life’ measures are thought through and in place for the cars traded-in under such a scheme would be important though. Other ‘nudges’ that are being brought in include the introduction of a workplace parking levy, as in Nottingham ([Workplace Parking Levy - Nottingham City Council](#)). There, the employers are responsible for paying the charge but they can choose to reclaim all or part of the cost from their employees.
15. It is encouraging that Llwybr Newydd commits to: “develop a range of behaviour change projects to make *smarter* travel choices *to reduce congestion and increase use of sustainable modes of transport*”. Alongside looking to expand public transport services and improve customer experiences of such journeys, the strategy also commits to encourage more car sharing. That would reduce the number of single occupant vehicles, helping to tackle congestion.
16. Road-user charging is also mentioned. Whilst this always generates controversy it does offer a way of reducing the incentive to make unnecessary journeys and encouraging use of public transport as a cost saving measure.
17. Overall, then there are various actions that could be taken involving a mix of ‘stick and carrot’. Some would provide an incentive to change whilst others would ‘penalise’ those choosing to continue to drive their car. Ultimately, the measures that are used are political choices and it will be for government and elected politicians at all levels to take these difficult decisions. They will need to monitor carefully to see what works, what doesn’t and assess if change is taking place at the rate required to contribute to emissions reduction targets for transport. Sharing of good practice and learning from other areas can play an important role here. However, measures are not always transferable from place to place and solutions in urban areas, for example, are likely to be totally different to what is needed in rural areas.



Views on proposals for bus and rail reform – including UK Government rail plans and the Welsh Government Bus White Paper

Bus White Paper

18. Welsh Government is currently consulting on its White Paper: [One network, one timetable, one ticket: planning buses as a public service for Wales \[HTML\] | GOV.WALES](#). WLGA is working with local authorities to develop its response to the proposals in that White Paper and will need to seek the views of the newly elected administrations. However, some initial headlines from work to date can be offered here, as follows:

- Overall, there is agreement that improvements can be made to current arrangements and support for the general principles behind the proposed changes, including the important potential contribution to tackling climate change
- Some of the practical steps required to put those principles into practice will be challenging for councils. Local authorities contribute significant amounts of funding from a variety of sources to bus services, but those contributions vary significantly. Those inputting the highest amounts currently will have concerns about the impact locally of effectively pooling resources with areas that have provided lower amounts of funding. Similarly, without significant additional funding, councils in areas with strong commercial networks at present will be wary that franchising could see a redistribution of resources to improve services in areas poorly served.
- Moving to complete, all-Wales franchising comes with risks and having ‘other tools in the box’ would be beneficial (e.g. the ability to agree partnerships with operators outside of franchise arrangements)
- Consideration is needed as to whether concessionary travel will extend to more rail journeys than at present. If franchising results in greater integration between bus and rail routes and some bus routes terminate at railway stations, bus-rail connections will have to become part of some every-day journey plans. If the rail part of a journey is not on a concessionary basis, many travellers currently making journeys using concessionary passes could face new travel costs
- There are concerns over the proposal for centralised control of the letting and managing of bus contracts. Over time, Transport for Wales may be in a position to assist with many aspects relating to contracts, but current knowledge and experience sits within local authorities. Building capacity in TfW is likely to be achieved, at least in part, by recruiting knowledgeable and skilled staff from local government. Given that these staff undertake numerous roles supporting other services (e.g. home to school transport) that will impact on the ability of councils



to meet their statutory duties in a number of areas. The perceived economies of scale that can be achieved by centralising functions could, therefore, come at a cost elsewhere in the whole system.

- If Small and Medium-sized Enterprises (SMEs) fail to win franchises in competition with larger operators it is likely to put their future at serious risk, with a range of potential unintended consequences locally. Moreover, the loss of SME operators will reduce competition in the market-place which, in an effective monopoly position, could result in increased wage and price demands. If SMEs do seek to continue operating having lost out in a bid for a franchise, they are likely to increase their costs for home to school transport, adding to the upward cost pressure already being experienced by councils
- The period between now and when franchising comes into play contains some significant risks. Operators could decide they do not want to participate in franchising. Larger operators could move their fleet to other parts of the UK or decide not to invest in their fleet until they know the outcome of franchise awards, thereby delaying necessary investment in low and zero carbon vehicles. Others may decide to cut services in advance of franchising, focusing only on the most commercial routes to reinforce their position in those areas
- In relation to the proposals to facilitate the establishment of council-owned/operated bus services, this would take time, expertise and substantial investment. Leaving aside the question of whether LAs have the financial and staff resources to enter into such investments in the first place, no LA would want to run the huge risk of investing and then not winning the franchise. Competition law and state aid issues would also be important considerations
- There is a risk, though, that the creation of Operator of Last Resort powers could become a self-fulfilling prophesy, if there is not the commercial capacity required to achieve the potential benefits of franchising.

UK Government Rail Reform Plans

19. The rail network connects Wales to the major cities of Great Britain with, for example, vitally important cross-border links from North East Wales into North West England, from Mid Wales to the Marches and the Midlands and from South Wales to Bristol and London.
20. At present, Welsh Government has statutory functions only for the Wales and Borders rail services contract. Services from three UK Government franchises have operated in Wales beyond its control. Welsh Government has called for a greater say in specifying rail services and in managing and developing rail infrastructure with a fair funding settlement. It has also called for arrangements



that recognise the diversity of UK devolution whilst maintaining an overall network that benefits all parts of Britain.

21. The William-Shapps *Plan for Rail* set out the UK Government's plan to return control of the railways across the whole of the UK to one authority. It will bring about what it claims to be the biggest change to the railways in 25 years, with the creation of a new public body, Great British Railways (GBR). GBR will own the infrastructure, collect the fare revenue, run and plan the network and set most fares and timetables. Under the *Plan for Rail* passenger franchises will be replaced by concessions ('passenger service contracts') which are expected to include incentives for operators to increase passenger numbers.
22. Devolved governments will continue to exercise the powers they currently hold in relation to rail, whilst supporting a single GB network. However, the Plan does not give any new or additional powers to Welsh Government or address fair funding (and the concerns that rail investment in Wales has been low compared to the size of the network with, unlike Scotland, no consequential from HS2 spending).
23. The Plan ends rail franchising (i.e. whereby private operators bid and then pay to run packages of services, subject to contractual conditions set by government). It replaces it with concessions (where, following competition, the government pays private companies to operate part of the network under a management contract but retains the commercial risk itself). Interestingly, a number of the arguments used by UK Government to justify the change are similar those being used by the Welsh Government to support its proposals for introducing bus franchising in Wales. These include simpler ticketing arrangements; benefits of economies of scale; unified branding; and more efficient, centralised planning of the network. There is even use of some of the same terminology, such as the 'guiding mind'. Whilst a new, unified brand and identity are proposed, though, there will be 'national and regional sub-identities'.
24. New National Rail Contracts will operate for two years as a 'bridge' to the new arrangements. These follow on from the emergency contracts introduced to run rail services because of reduction in travel due to Covid-19.
25. For Wales, the UK Government claims there will be greater collaboration, improved services, consistency and co-ordination across the whole of the UK.
26. It is understood that the Plan will require primary legislation and therefore will take time to proceed through the UK Parliament.
27. The full implications of the changes still need to be worked through. It is worth noting though, that for local authorities in Wales the running and operation of the railway also has important links to their management of the highway network (e.g. level crossings and bridges) and council-owned land adjacent to the railway. Rail-related investments are now being funded as part of economic 'deals' by UK Government and, potentially, via the Shared Prosperity Fund and Levelling Up Fund. Further funding could be made available linked to the Union Connectivity review. Supporting infrastructure, to assist and enhance the rail network, could include freight terminals, railway stations, active travel connections.



28. The *Plan for Rail* must therefore be seen as part of the wider UK Government drive for Union Connectivity and cross-border investment, facilitated by the Internal Market Act. Given the measures being taken to improve bus-rail integration as part of Welsh Government's Bus White Paper it will be vitally important that the *Plan for Rail* works in complementary ways. Strong links will need to be forged between GBR and all of the bodies working on bus improvements in Wales, from Welsh Government to Transport for Wales, to local authorities and the bus operators themselves.

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Ensuring Public Transport Supports the Needs of all Sections of the Population

Summary of Evidence

This submission responds to the call for evidence on priorities for post covid recovery for Welsh bus and rail with particular attention to growing public transport use and supporting the needs of sections of the population who rely on it. It contains evidence on how public transport is used across the population and the contribution it makes to people's lives. It particularly focuses on buses given buses are the most commonly used form of public transport in Great Britain.

We are still seeing lower levels of bus and rail use two years after the start of the pandemic. It is difficult to judge whether this is a 'new normal' or patronage levels will return to former levels. It is worth taking a step back and reflecting on pre-pandemic trends and what they tell us. This submission draws on pre-pandemic research carried out by the Centre for Transport & Society and the work of other researchers. While public transport use has been dramatically curtailed during the pandemic, its importance in supporting the recovery after the pandemic cannot be over-stated with reform long overdue to make it more affordable and convenient for those who need to use it.

Trends in car and public transport use

Personal travel has been decreasing in the first two decades of the 21st century with 10% fewer trips and miles travelled per person in 2019 compared to 2002. A reduction in car travel explains most of this trend. Bus travel has also decreased but rail travel has increased. Bus use has been decreasing in most areas of England, but there are notable exceptions in cities such as Bristol and Reading where there has been targeted investment to improve bus services.

Importance of buses across the population

Despite the observed reduction in bus journeys, buses remain an important mode of transport for large parts of the population. One in four adults (25%) in England use buses at least once a week, while 14% use buses at least once a month. Nearly a third of the adult population (31%) do not have personal car access with over half of these (54%) using buses at least once a week, indicating the importance of buses to people without cars. While three-fifths of the population make little or no use of buses at any one time, people's travel behaviour is fluid and people have been found to increase their public transport use when their life circumstances change and when they experience improvements to public transport connections. It is important to anticipate a strong return to bus use after the pandemic as people resume activities and move their lives forward.

Public transport and changing working patterns

Public transport was particularly important pre-pandemic for commuting with 8% of commute trips in England undertaken by bus and 12% by rail (including London Underground). However, regular

commuting to the same destination at the same time has decreased amongst the population and is likely to further decrease post-pandemic. To serve the needs of increasingly complex work travel patterns requires re-thinking the design of public transport services in terms of timetabling and ticketing.

Satisfaction with using public transport

While a high degree of satisfaction with public transport is reported by users from surveys undertaken by Transport Focus, amongst the broader population there has been a decrease in satisfaction with local buses in recent years. Public transport commuters are less satisfied with journeys to work than commuters using other forms of transport with crowded conditions and unpredictable journey schedules known to contribute to stressful public transport commutes. Providing high quality public transport services to more of the population will increase levels of satisfaction and encourage greater public transport use.

Cost burden of running a car and using public transport

Household expenditure on transport adjusted for inflation increased from £69 per week in 2009 to £80 in 2018/19. Motoring costs represent a large proportion of this expenditure (£59). It has been estimated that 6.7% of UK households are in a state of 'forced car ownership' where they own a car but are materially deprived in other respects. Average household expenditure on fares and other transport costs has risen from £11 a week in 2009 to £21 in 2018/19 which indicates an increasing cost burden for those that rely on public transport.

Importance of public transport for life opportunities

Various studies have shown that lack of good public transport connections is a major barrier to seeking employment. People aged 70 and over, people who have impairments and people with low household incomes are less likely to be able to access essential services than the rest of the population and it has been shown that better public transport connections improve their ability to access services. It is clear that access to life opportunities can be enhanced through improving public transport alternatives.

Role of public transport for young people

Young adults in Great Britain are driving less now than young adults did in the 1990s and make fewer journeys than all other age groups, except those over 70 years of age. As young people get older they travel more independently and buses make up a larger share of their travel. Bus use is particularly important for those living in households without a car. A number of 'impact pathways' have been identified via which a deficit of transport might impact on young people's development and future prospects. Lack of good public transport can: (i) inhibit young people's independence, autonomy and self-efficacy; (ii) compromise education, training and employment prospects; and (iii) limit future ambitions. It is recommended transport subsidies are redirected as a force for positive change for young people and that national governments should support systems for concessionary fares, bursaries and loans that are clear, universal and consistently applied.

May 2022

Full Evidence

This submission contains evidence on how public transport is used across the population and the contribution it makes to people's lives. It particularly focuses on buses given buses are the most commonly used form of public transport in Great Britain. It draws on pre-pandemic research carried out by the Centre for Transport & Society at UWE Bristol, as well as the work of other researchers. While public transport use has been dramatically curtailed during the pandemic, its importance in supporting the recovery after the pandemic cannot be over-stated with reform long overdue to make it more affordable and convenient for those who need to use it.

1. Trends in car and public transport use

It is important to look at pre-pandemic trends of travel in general, and car use in particular, to set the context for public transport trends. The car in 2019 was still by far the most dominant form of personal travel (with 61% of personal trips by car and 77% of personal trip mileage by car in England (NTS0601¹)) but growth in car travel has levelled off since the mid-1990s. In fact, car trips per person fell 14% and car mileage per person fell 16% between 2002 and 2019 (NTS0601). The decrease in personal car travel has not been compensated by significant increases in use of other forms of transport. There has been a reduction overall in the number of journeys made per person in England of 11% between 2002 and 2019 and of distance travelled by 10% (NTS0601). Commuter trips and shopping trips have seen particularly large falls which are attributed to changes in working practices and the impact of on-line shopping deliveries (Marsden et al., 2018).

The aggregate trend of decreasing car travel masks differential trends within the population with younger people driving less than previous cohorts of young people and older people driving more than previous cohorts of older people (Chatterjee et al., 2018). The trend of decreasing car travel also differs by geographic area. Reductions in car travel have been largest for those living in Greater London and smallest for those living in rural areas (ibid). There are also contrasts within large urban areas with reductions in car travel and increases in public transport use in central areas and continued rises in car travel in peripheral areas and on inter-urban routes (ibid).

Transport policies have sought to reduce car travel in towns and cities. Mass transit systems (light rail, trams, bus rapid transit) have been expanded in some cities and progress has been made in developing walking and cycling networks in London and some other towns and cities. However, bus provision and patronage have generally declined outside London where they are deregulated (UTG, 2018). Bus service miles in England outside London have decreased by 12.9% since 2004/05 driven by a 49% decrease in local authority supported mileage (DfT, 2019). Bus use in England outside London has been in decline since 2008/09 with a decline in London also seen since 2014/15. The taxi and private hire vehicle market has been transformed by the arrival of ride-hailing services such as Uber, although no significant increase in personal travel by taxi/minicab has been recorded in national travel statistics (NTS0601).

TSGB figures show that bus journeys in Great Britain declined by 12.8% in the last 10 years (between 2009/10 and 2019/20), while national rail journeys increased by 38.5% (and London Underground

¹ Results from National Travel Survey are referenced in this paper in terms of data table numbers such as NTS0601. The data tables can be found at <https://www.gov.uk/government/collections/national-travel-survey-statistics>

journeys increased by 26.2% and light rail journeys increased by 44.4% (TSGB0101²). However, bus journeys are by far the most common form of public transport used making up 57% of all journeys by public transport in 2019/20. While bus use has generally declined, there have been exceptions in some places where there has been targeted investment, including Reading and Bristol (Goodman et al., 2020). An analysis by Le Vine and White (2020) concluded that “the decline in bus travel in England outside London has been particularly influenced by a contraction in the traditional bus market (where the highest users were female, people on low-incomes, non-car owners, students and pensioners)”.

2. Importance of buses across the population

It is estimated that one in four (25%) adults aged 16 and over use buses often (at least once a week), while 14% use buses sometimes (at least once a month but less than once a week) (Chatterjee et al., 2019a). Nearly a third of the adult population (31%) do not have personal car access with over half (54%) of these using buses often, indicating the importance of buses to people without cars. Bus use is more common for people living near frequent bus services and those living in London and other large cities. Frequent bus use is also more common amongst younger and older adults, those in BAME groups and those with lower incomes. Meanwhile, one-in-ten (8%) people use trains often (at least once a week). Unlike buses, trains are used more often by those with higher incomes.

It is tempting to think of there being a fixed group of the population who are bus users and fixed groups of car users, rail users and cyclists. In reality the majority of people use a blend of transport options. An analysis of National Travel Survey one-week travel diary data (Heinen and Chatterjee, 2015) showed 27% of English adults reported making a bus journey in a particular week but for only 30% of these was bus the main transport mode they used that week. This highlights bus is the main form of transport for about 8% of adults and contributes to the mix of transport modes used for over one quarter of adults.

A study of over 1,500 commuters in Bristol found a similar story in that relatively few commuters used the bus on each occasion they went to work (4%) but a larger number included bus in their transport alternatives used during a one week period (8%) (Chatterjee et al., 2016). Over time, many people make changes to their travel choices as their circumstances changes. The study of Bristol commuters followed the participants every three months and asked them to report a week’s commuting each quarter. It found about one in four made a change in the transport modes they used from one quarter to the next (Chatterjee et al., 2016).

Looking at a representative sample of 15,000 English workers in 2009/10 and comparing their main commute mode a year later, it was found that two-thirds of bus commuters (66%) were still using the bus a year later but 34% were using another option (half of these switching to car, about 170 individuals) (Clark et al., 2016). Of car commuters, 91% were still using a car one year later with 2% switching to public transport (1% to the bus and 1% to the train) with this comprising 200 individuals (ibid). Commute mode changes were particularly likely when changing job or moving home (which occurred for 11% and 7% of the population respectively). High quality public transport links to employment centres were shown to encourage switches away from car commuting.

It has also been seen how major improvements to bus services available to the population result in increasing bus use. A study of the impacts of the Fastway bus rapid transit system in West Sussex

² Result from Transport Statistics Great Britain (TSGB) are referenced in terms of data table numbers such as TSGB0101. The data tables can be found at <https://www.gov.uk/government/collections/transport-statistics-great-britain>

showed 21% of residents had increased their bus use six months after its introduction with 6% decreasing their bus use (Chatterjee, 2011), thus showing a significant net increase in bus users.

3. Public transport and changing working patterns

Public transport was particularly important pre-pandemic for commuting with 8% of commute trips in England undertaken by bus and 12% by rail (including London Underground), but only 5% of all trips undertaken by bus and 3% by rail (including London Underground (NTS0409)). However, even before the pandemic, the average worker was commuting less often (379 commute trips per year on average for those full-time employed in England in 2002 and 323 in 2019 (NTS0411)) with changing working patterns such as increased part-time work, flexible working and remote working. Crawford (2020) has distinguished four types of travel-to-work patterns amongst English workers - infrequent, spatially variable, temporally variable and regular travellers. The group of regular travellers has decreased in size between 1998 and 2016 from 63% to 59% but remains the largest group. They use public transport more for their work travel than the other groups. Both the infrequent and spatially variable groups have grown over the same period (16% to 22% for infrequent group and 5% to 10% for infrequent group). To serve the needs of increasingly diverse work travel patterns requires re-thinking the design of public transport services in terms of timetabling and ticketing for example.

4. Satisfaction with using public transport

Most public transport users report being satisfied with the journeys they take - just over 80% of rail passengers report being satisfied with their journeys (TSGB0608) and the figure is 89% for bus passengers in England (outside London) (Transport Focus, 2020). However, trend data from the National Travel Survey shows a decrease in satisfaction with local buses from 73% of residents being satisfied in 2009/11 to 68% in 2015/2017 (Le Vine and White, 2020).

International research shows commuters who walk and cycle report the highest levels of commute satisfaction, whereas public transport users report the lowest levels (Chatterjee et al., 2020). This has been attributed to stress induced by unpredictable journey times and crowding. An analysis of *Understanding Society* data from 26,000 employed people living in England between 2009/10 and 2014/15 found that bus commuters feel the negative impacts of longer commute journeys more strongly than users of other transport modes in terms of job satisfaction and mental health (Clark et al., 2020). It also found that rail commuters with longer commute times have lower strain than rail commuters with shorter commute times. One possible explanation is that people with shorter rail commutes find them more stressful as they are more likely to involve the use of crowded, urban commuter lines or metro systems. Commuters with longer journeys may be better able to use their journey time productively.

5. Cost burden of running a car and using public transport

Household expenditure on transport adjusted for inflation has increased from £69 per week in 2009 to £80 in 2018/19 (TSGB1306). Hence, transport costs represent an increasing burden on households, especially low-income households. Motoring costs represent a large proportion of this expenditure (£59), highlighting the cost burden of owning and running a car for households with modest incomes. In 2019, three-quarters of households (76%) in England had at least one car (NTS0205). Mattioli (2017) estimated that 6.7% of UK households were in a state of forced car ownership in 2012 (households who own at least one car and are materially deprived) and compared to those without cars were more likely to include children and employed adults in the middle age groups, to be on low-to-middle incomes and to have a mortgage. If public transport could serve their needs instead, they could improve their economic situation.

Average household expenditure on fares and other transport costs has risen from £11 a week in 2009 to £21 in 2018/19 (TSGB1306) which indicates the increasing cost burden for those that need to use public transport. Between 2011 and 2017 the cost of rail travel rose by 19% and bus by 24%, while the cost of motoring did not rise and the consumer price index rose by 11% (TSGB1308).

6. Importance of public transport for life opportunities

People's ability to access activities (education, jobs, networks and services) is related to the location where they live (which determines the jobs, networks and services nearby) and the transport options available to connect them to activity destinations. A Joseph Rowntree Foundation funded study into transport-related barriers to employment in low-income neighbourhoods found employment opportunities were difficult to reach by public transport and out-of-work residents were therefore unwilling to look for jobs, especially if they perceived jobs to be insecure (Crisp et al., 2018). It has been shown using English Census data that longer public transport times to employment were associated with lower employment rates at the neighbourhood-level, after accounting for population and car availability (Johnson et al., 2017).

There have been relatively few attempts at systematic evaluation of the benefits of initiatives aimed at improving accessibility for target groups/areas. A case study evaluation of four projects funded by the Urban Bus Challenge Fund (Lucas et al., 2009) in deprived communities found that users of the enhanced/new bus services were predominantly non-car owners and used the buses for a mixture of travel purposes, often involving new journeys not made previously. Research on the impact of the introduction of the concessionary bus pass since 2006 shows increased bus use by older people since its introduction with surveys of users suggesting that it enables them to engage in new activities and pursuits and gives a sense of belonging (Ormerod et al., 2015).

DfT commissioned NatCen and UWE Bristol in 2019 to investigate how access to transport affects life opportunities and wellbeing of across the wider population in England (Chatterjee et al., 2019a). The study involved analyses of two national longitudinal data sets: *Understanding Society* and the *English Longitudinal Study of Ageing*. It found people aged 70 and over, people who have impairments and people with low household incomes are less likely to be able to access services (healthcare, food shops and learning facilities) than the rest of the population. Both personal car access and public transport access were found to be important for being able to access services. Rating local public transport as good, rather than poor, makes it 2.8 times more likely that someone is able to access services. Short journeys by public transport to town centres (10 minutes or less) make it 1.7 times more likely that someone can access services (compared to journeys of over 30 minutes). Rating local public transport as good, rather than poor, also makes it 1.4 times more likely that someone is able to go out socially. Hence, positive opinions of public transport (which are linked to living close to good public transport services) are associated with better access to services and increased social participation. This shows that access to life opportunities can be enhanced through improving public transport alternatives.

7. Role of public transport for young people

Public transport has particular significance for young people. It is important to highlight firstly that young adults in Great Britain are driving less now than young adults did in the early 1990s (Chatterjee et al., 2018). According to statistics for 2019, 35% of young people aged 17 to 20 have a full driving licence, down from a peak value of 48% in 1992/94 (NTS0201). For 21-29 year olds, 62% have a full driving licence in 2019 while it was 75% in 1992/94. This has been accompanied by a substantial decrease in overall travel of young adults. National Travel Survey results for 2019 show

that 17-20 year olds make fewer journeys than all other age groups, except those over 70 years of age, making 824 journeys per year (2.3 per day) compared to 953 journeys per year (2.6 per day) for all ages (NTS0601). It is notable that the number of journeys made by this age group has decreased from 1,003 per year in 2002. Similarly, 21-29 year olds make 860 journeys per year (2.4 per day) compared to 1,061 journeys per year in 2002. This suggests there are particular barriers to travel for young adults which have emerged in the last 20 years. A study commissioned by the Department for Transport to explain the trend of declining car travel among young people concluded that it has been driven “by changes in young people’s socio-economic situations (increased higher education participation, rise of lower paid, less secure jobs and decline in disposable income) and living situations (decline in home ownership and re-urbanisation” and also “changes in when people start a family, their social interactions (substituting face-to-face interaction with digital communication, for example) and the importance that people attach to driving” (Chatterjee et al., 2018).

Figure 1 shows the use of different transport modes by young people aged under 30. Getting lifts by car dominates the travel of under 17 year olds, making up over half of journeys made. As young people get older they travel more independently and buses make up a larger share of their travel. Bus use is particularly important for those living in households without a car (see Figure 2).

Figure 1: Mode share percentage for trips made by children and young people in England in 2017

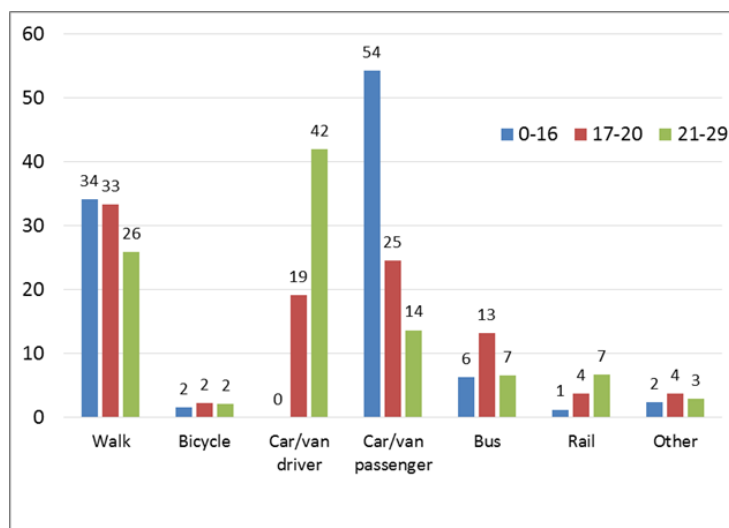
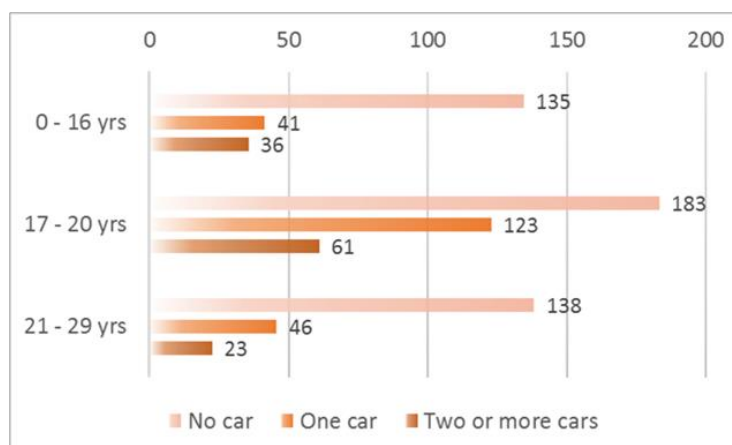


Figure 2: Bus journeys per year and household cars in England in 2016-17



The role of public transport for young people is a particularly important issue to consider when looking at the future of buses post-pandemic. In 2019, the Health Foundation commissioned Sustrans and UWE Bristol to review evidence on ‘the role of transport in supporting young people to develop and transition to an independent healthy future’ (Chatterjee et al., 2019b). A number of ‘impact pathways’ were identified via which a deficit of transport might impact on young people’s development and future prospects. These are shown in Table 1 below from which it can be appreciated that lack of good public transport can: (i) inhibit young people’s independence, autonomy and self-efficacy; (ii) compromise education, training and employment prospects; and (iii) limit future ambitions. It is clear that access to affordable public transport, especially buses, can mitigate negative consequences from not having access to car transport.

Table 1: Impact pathways by which transport affects young people’s development

1. Education and training options	Young people can have limited local education and training options due to lack of transport to get to more distant opportunities
2. Participation in out-of-school activities	A household car enables children to participate to a greater extent in out-of-school activities; participation in out-of-school activities has been shown to benefit children economically in the long run
3. Physical activity and mental wellbeing	Walking and cycling contribute significantly to recommended physical activity levels for young people who travel in these ways and physical activity is linked to better mental wellbeing
4. Independence, autonomy and self-worth	Independent mobility allows young people to develop social connections and choose their own activities, providing increased autonomy in their lives
5. Capabilities and willingness to use transport options	Young people supported and encouraged to use alternatives to the car as children are more likely to be willing to use them when older
6. Employment opportunities	Young people are disinclined from considering jobs with difficult journeys by public transport and employers are reluctant to offer jobs to them
7. Stress, fatigue and low self-esteem	Poor quality of the built environment for walking (unattractive, mistreated and ‘forgotten’ places) causes psychological and emotional stress
8. High transport costs and job/housing immobility	Young people are less likely to change their job or move home to seek improved career opportunities than previously was the case with high transport (and housing) costs seen as contributory factors

Given the important role public transport plays in supporting life opportunities for young people the report recommended transport subsidies should be redirected as a force for positive change for young people and that national governments should support systems for concessionary fares, bursaries and loans that are clear, universal and consistently applied (Chatterjee et al., 2019b). Concessionary fares systems need to be non-discretionary and funded across the UK to benefit those younger people who are most in need of reduced travel costs. Concessionary fares should cover all those subject to compulsory study or training (16 and 17 year olds) and all those people under 25 looking for work and in the first months of employment.

UWE Bristol and Sustrans are following up the evidence review with a three-year project funded by the Health Foundation (see <https://www.health.org.uk/article/building-the-policy-agenda-for-young-peoples-future-health>) which aims to make the policy case for transport that better enables young people aged 16-24 to make journeys and reach opportunities that help them to thrive. A policy briefing is currently being prepared on 'Fair bus fares for young people' which includes:

- Current picture across the UK of discounted bus fares for young people aged 16+ and future ambitions of 79 Local Transport Authorities in England for bus fares for young people as set out in their Bus Service Improvement Plans.
- Case studies of discounted bus fare schemes for young people in South Yorkshire, West Yorkshire, Scotland and London. These case studies consider how discounted fares for young people are justified, the extent to which young people use the schemes, and what benefits young people gain from them.
- Recommendations to national governments, local authorities and bus operators on future improvements to the offers they make for young people on bus fares.

We would be happy to share the policy briefing with the Welsh Parliament as soon as it is available.

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Welsh Government

Ein cyf/Our ref MA/JJ/1491/22

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9 May 2022

Dear Llyr,

Report on Storm Overflows in Wales – Response to recommendations made by the Climate Change, Environment and Infrastructure Committee

I would like to thank you and the Committee for the opportunity to discuss our approach to tackling discharges from storm overflows and your detailed report published on 15 March.

I acknowledge the conclusions made within the report and enclose a detailed response to these, accepting or accepting in principle all 10 recommendations.

Yours sincerely,

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Minister for Climate Change

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Rydym yn croesawu derbyn gohebiaeth yn Gymraeg. Byddwn yn ateb gohebiaeth a dderbynnir yn Gymraeg yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi.

We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.

Written Response by the Welsh Government to the report of the Climate Change, Environment and Infrastructure Committee entitled Report on storm overflows in Wales.

Water is one of our greatest natural assets and an integral part of Wales' culture, heritage and national identity. It shapes our natural environment and landscapes, supporting biodiversity and our ecosystems. As a vital natural resource, water underpins our economy and the effective operation of infrastructure, including energy supply. Access to clean, safe and resilient water supplies is essential also in supporting the health and well-being of everyone who lives, works and visits Wales.

Protecting and enhancing our water environment remains the Welsh Government's priority. Our Programme for Government commits us to improving water quality by beginning to designate inland waters for recreation and strengthening water quality monitoring. It also includes a commitment to enhance the legislative framework in relation to Sustainable Drainage Systems (SuDS) to provide additional environmental, biodiversity, well-being and economic benefits to our communities. We have made provision for a multi-year multi million-pound programme of works to improve water quality totalling over £40 million over the next 3 years.

Water Quality – Water Framework Directive classification

Natural Resources Wales' (NRW) latest data indicates that 40% of Wales' waterbodies (44% of rivers) are at good or better ecological status, and the latest figures show a gradual improvement in environmental water quality in Wales. "Good ecological status" (GES) is a standard metric used for assessing the health of the water environment. It is assigned using various water flow, habitat and biological quality tests. Failure to meet any one individual test means that the whole water body fails to achieve good ecological status.

For Wales' bathing waters, the latest data shows that for the fourth consecutive year, we have achieved 100% compliance with environmental standards, with 85 of the 105 bathing waters achieving a classification of 'excellent'.

Our water bodies are under pressure from a range of challenges however – extreme weather, pollution, climate impacts, industrial processes and associated water demand and population growth. Our water bodies need to be protected so current and future generations can benefit from a prosperous, resilient and healthy Wales. The Welsh Government is already bringing forward a comprehensive range of policy and regulatory interventions, supported by substantial package of investment, but we cannot do this alone. It is only by working together and taking a 'Team Wales' approach that we can tackle the multiple risks impacting our lakes, rivers and streams.

The evidence shows clearly that, in many cases, agricultural pollution is one of the major factors causing waterbodies to fail. Other problems include pollution from abandoned mines, roads, water industry assets, and physical modifications to waterbodies, amongst other things.

The most recent NRW data indicate that storm overflows have been identified as a reason for not achieving Good Status in 3.7% of waterbodies across Wales. Of the 933 waterbodies across Wales, 4 of the failures confirmed as contributing and 27 assessed as probable reasons for failure, with a further 4 waterbodies suspected. Undoubtedly, there are pressures impacting these water bodies, so tackling storm overflows alone will not lead to wholesale improvement so there needs to be a focus on developing solutions that will address all causes of pollution

Storm Overflows

Reducing impacts from storm overflows is important. We need a cross sectoral, holistic approach to achieve this. The Welsh Government is focusing on sustainable, nature based solutions to divert and remove as much surface water as possible away from the sewerage systems to increase network capacity.

Storm overflows provide a controlled point of relief at times of heavy rainfall. With more extreme weather events occurring, they perform a crucial role in reducing the risk of sewers flooding homes and public spaces, preventing sewage from flooding homes and businesses.

Replacing all existing CSO's would be a long-term multi billion-pound carbon intensive project and would not be the most effective way of improving water quality or be resilient to the increasing pressures from climate change.

We have already taken steps to tackle discharges from overflows. This includes making sustainable drainage systems (SuDS) mandatory on almost all new building developments. This will help relieve pressure on the network by redirecting and slowing down the speed at which surface water enters the sewer system. It will help ensure storm overflows are only used as a last resort.

Drainage and Wastewater Management Plans (DWMP)

The Welsh Government collaborated with the water industry, regulators and UK and devolved Governments via the 21st Century Drainage Programme, to develop a framework, guidance and methodology for water companies to improve long-term planning for drainage and wastewater management.

The Environment Act 2021 places drainage and wastewater planning on a statutory footing in England and Wales. It provides for the Welsh Ministers to make regulations on the content and process to be followed by Welsh water companies when producing a DWMP. The statutory framework will apply to plans prepared after 2025, and the Welsh Government has undertaken to consult with stakeholders on any regulations establishing the legislative framework in Wales.

The water companies are currently preparing draft (non-statutory) DWMP for consultation later this year. My officials have established a network comprising of regulators, water companies and stakeholders in Wales to work closely with the water companies as they develop their draft DWMP. Working with NRW, Defra, the

Environment Agency and Ofwat we have developed and published guiding principles for the development of DWMP's:

[Guiding principles for drainage and wastewater management plans \(gov.wales\)](https://www.gov.wales/guiding-principles-for-drainage-and-wastewater-management-plans)

Planning for drainage and sewerage services has many interdependencies – water companies must meet their statutory duties under environmental legislation, they need to work with local authorities (who have responsibility for flood prevention and significant drainage assets such as highway drainage and sustainable drainage systems which may discharge water into the water companies network), landowners and farmers (whose water might enter the water companies network, or receive water spilling from the water company network).

DWMPs will form a key part of the evidence base for water companies to develop and prioritise their investment plans in drainage and wastewater management in the short, medium and long term. This includes identifying where investment to improve water quality should be prioritised, and the best method to do this.

The plans will look at ways to address existing and future pressures on the drainage and wastewater system as a whole, including population growth and climate change, to build a more resilient wastewater and drainage infrastructure. As part of the more collaborative approach, we will expect water companies continue to deliver nature-based solutions. These measures will relieve pressure on the sewer network by slowing down the speed at which surface water enters the sewer system, further minimising discharges from CSOs.

I would like to thank the members of the Climate Change, Environment and Infrastructure Committee for their report on storm overflows in Wales. I have set out my response to the Report's individual recommendations below.

Recommendation 1

The amount of sewage discharges into Welsh Rivers is unacceptable. We must see action from the Welsh Government in its leadership role, to ensure that the number and volume of discharges is reduced as a matter of urgency. The Minister should report back to the Committee 6 months after the publication of this report setting out the actions she has taken with partners to address this issue.

Response: Accept

There has been much media coverage recently about water quality and sewage discharges into waterways. There is a widespread perception this is the main cause of poor water quality. The evidence however, shows that numerous factors contribute to poor water quality (agricultural pollution, private drainage misconnections, septic tanks, among others).

This is why tackling overflows is one of the key components of a wider, holistic approach Welsh Government is taking to improve water quality. We are working closely with delivery partners, regulators and the relevant sectors to identify and implement sustainable solutions which not only deliver on desired water quality

improvement outcomes but also support climate change adaptation, improved biodiversity and deliver against our net zero target.

To progress evidence-based catchment solutions, better information is required about discharge quality from overflows and the impact on the receiving water quality. Improved effluent monitoring at targeted sites, together with event duration monitoring already in place, will enhance evidence available and enable effective targeting and prioritisation of action. Current and future overflow monitoring must also work in parallel with monitoring programmes for pollution sources from agriculture, diffuse and other sectors.

My officials are working with the regulators, water companies, Afonydd Cymru and Consumer Council for Water (CCW) through the Better River Quality Taskforce to develop action plans. These will support our understanding and identify whether changes are required to ensure water companies effectively manage and operate their network of sewers to meet current and future challenges.

I have been clear that we need to take an integrated catchment approach focussing on multi-sector co-operation and nature-based solutions to drive water quality improvements. By taking an integrated, catchment based approach and improving community engagement we will be better able to take account of local circumstances and priorities. This will help to address CSO discharges while tackling the other main causes of poor water quality.

I will provide an update to the committee on this in 6 months.

Financial implications – Costs will need to be scoped out - we are working with consultants to prepare a report which will quantify the cost to protect water quality (meeting WFD, bathing water and shellfish water requirements). This will include delivery scenarios encompassing different speeds and engineering approaches (for example, grey vs grey/blue/green) taking account of suitability, constraints and opportunities catchment-by-catchment and will include a prioritization by sensitive waterbodies (e.g. SAC, SSSI). We expect the report to be finalised by the end of the year.

Recommendation 2

We must see demonstrable progress from NRW on its work to bring ‘unpermitted’ storm overflows within the regulatory regime. We expect NRW to report back to the Committee on progress no later than 6 months of the publication of this Report.

Response: Accept in principle

NRW will provide the response to this recommendation.

Financial Implications – Costs will need to be scoped out depending on the pace and volume of work required, additional resources may be required.

Recommendation 3

NRW and water companies should publish annual data and/or information on the proportion of sewage spills that are not within permit conditions, which category of pollution incidents these resulted in, and whether enforcement action was taken.

Response: Accept

Event and duration data is reported on an annual basis by the water companies. Numbers and categories of pollution incidents caused by water company assets and any subsequent enforcement action are captured in the NRW annual environmental performance assessment for the companies.

[Combined storm overflows | Dŵr Cymru Welsh Water \(dwrcymru.com\)](#)

[Documents | Regulatory Library | HD Cymru](#)

[Natural Resources Wales / Annual performance report for Dŵr Cymru \(Welsh Water\)](#)

[Natural Resources Wales / Annual performance reports for Hafren Dyfrdwy](#)

Financial Implications – None

Recommendation 4

NRW, water companies and other relevant stakeholders should develop enhanced monitoring arrangements with a view to better understanding the impact of sewage spills on receiving water. In taking this work forward, consideration should be given to the potential role of citizen science within enhanced arrangements.

Response: Accept

One of the action plans being developed by the Better River Water Quality Taskforce will focus on monitoring arrangements. An investigative monitoring programme will be established between NRW and the Water companies to determine long-term requirements for monitoring overflows throughout Wales. The need to monitor for a wider range of pollutants including micro plastics, pharmaceuticals, and public health parameters will also be assessed.

The Water companies will also investigate and promote the use of monitoring and evidence from other sources including innovative solutions and technology. Citizens and local groups can play a key role in helping tackle water quality pollution through providing monitoring intelligence and public awareness. The taskforce will actively work with citizen scientists to understand how their work can support and inform a better understanding of the impact of spills on receiving waters.

Financial Implications – Costs of an enhanced monitoring programme will need to be scoped out.

Recommendation 5

Dŵr Cymru and Hafren Dyfrdwy should aim to report on discharges from storm overflows “within an hour of the discharge beginning”, which is a requirement placed on water companies in England by the Environment Act 2021. If they cannot match this standard, both companies should explain why.

Response: Accept in principle

The water companies will respond in more detail. Both companies support this recommendation in principle, but consideration needs to be given to capturing data, and how the data is presented and whether this is compatible with current digital systems. There may be challenges in rural areas where telemetry and digital connectivity may be an issue.

Financial Implications – Costs of any additional telemetry systems will need to be scoped out and will fall to water company customers.

Recommendation 6

The Minister should ensure that the Roadmap for Storm Overflows includes targets and timescales for the reduction of sewage discharges. It should include comprehensive and transparent monitoring and reporting mechanisms to enable progress to be assessed. The Minister should report back to the Committee on progress towards delivery of the action plan accompanying the Roadmap for Storm Overflows within 12 months of their publication.

Response: Accept

My officials are working closely with NRW, water companies, Ofwat, Afonydd Cymru and CCW as part of the Better Water Quality taskforce. Please find attached a statement summarising the purpose of the taskforce, work to date and focus areas.



roadmap statement
250422.docx

Financial Implications – Costs to support the development of the action plans will be met from existing budgets. Costs to support the delivery of the action plans will need to be scoped out.

Recommendations 7

Ofwat should report back to the Committee on the findings of its investigation into water companies, insofar as those findings relate to companies in Wales, as soon as reasonably practicable. This should include details of any action taken as a result of those findings.

Response: Accept

Ofwat has confirmed it will report back to the Committee on the findings of its investigation.

Financial Implications – None.

Recommendation 8

NRW should report back to the Committee on action taken as a result of the findings of Ofwat and the Environment Agency's investigations, as soon as practicable. This should include details of any review of NRW's compliance approach and any work undertaken with, or enforcement action taken against, water companies as result of those findings.

Response: Accept

NRW has confirmed it will report back to the Committee if any action is taken as a result of the findings of Ofwat and Environment Agency investigation.

Financial Implications – None

Recommendation 9

The Minister should work with partners to identify and address the barriers to increasing Nature Based Solutions to water management. The Minister should report back to the Committee on this matter not later than 6 months after the publication of this report.

Response: Accept

Flagship projects are being taken forward to exemplify the type of natural drainage system and partnership working that can be developed and taken forward.

Greener Grangetown ,Cardiff, an innovative £2 million partnership project between Cardiff Council, Dŵr Cymru Welsh Water and Natural Resources Wales, supported by the Landfill Communities Fund. The project uses the latest sustainable drainage (SuDS) techniques to catch, clean and divert rainwater directly into the River Taff instead of collecting and pumping it eight miles to a treatment works in the Vale of Glamorgan and then discharging it out to sea. This is the first time that these techniques have been retrofitted into an urban environment at this scale.

<https://greenergrangetown.wordpress.com/2018/10/10/greener-grangetown-project-completion-marked-by-welsh-environment-minister-gweinidog-amgylchedd-cymru-yn-nodi-cwblhau-project-grangetown-werddach/>

Rainscape - Welsh Water invested £115 million across Llanelli and Gowerton in innovative work between 2012 and 2020. It manages surface water and reduces

sewer flooding by separating rainwater from the existing system, slowing down the rate it enters the network and by redirecting it to local rivers and watercourses, and in some cases, removing it completely. It creates greener, cleaner communities and improved habitats and biodiversity. This is one of the largest nature-based scheme in the UK.

<https://corporate.dwrcymru.com/en/community/environment/our-projects/rainscape/rainscape-llanelli>

We have established relationships with all the key stakeholders and delivery partners involved in delivering Nature Based Solutions dating back to before we implemented Schedule 3 to the Flood and Water Management Act 2010. When we commenced the requirements for Sustainable Drainage systems (SuDS) from January 2019, we established a SuDS Implementation Group, which was tasked with identifying and working through such issues. The group includes the water and sewerage sector in Wales, the 22 Local Authorities and SuDS Approving Bodies, the WLGA, the Home Builders Federation (HBF), the Federation of Master Builders, Natural Resources Wales, Environmental NGOs, social landlords and civil engineers, among others.

Presently, we are commissioning an independent review of the implementation of the SuDS regime in Wales, which will engage with the multiple stakeholders involved in SuDS delivery including planners, developers, Local Authorities and social housing. We are presently in discussion with a potential appointee but I expect the review to deliver an interim report in the latter half of this year, which I would be happy to share with the Committee. This will build on work already undertaken by our partners in the WLGA.

Alongside this, my officials are engaging with UK government counterparts in their review of the case for implementing of Schedule 3 to the Flood and Water Management Act 2010, which is uncommenced in England. The work of the review includes identifying and addressing barriers to the uptake of SuDS.

Our longer-term ambition is to facilitate more nature-based solutions. These can include wetland habitat restoration, natural flood management, using natural materials for buildings and infrastructure such as green roofs, walls and driveways. The Sustainable Farming Scheme will also provide opportunities for more nature-based solutions.

The Strategic Priorities and Objectives Statement will set out the requirement for Ofwat to take into account the multiple benefits of nature-based solutions during the next price review process. In the interim, our programme for government has committed to strengthening the legislative requirements for SuDS that promote wildlife habitat, as part of our response to the climate emergency and ensuring the well-being of future generations.

Financial Implications – None. Any additional costs will be drawn from existing programme budgets.

Recommendation 10

The Minister should report back to this Committee no later than 6 months after the publication of this Report setting out the different actions she is taking to address the problem of pollution in Welsh rivers from sources other than storm overflows.

Response: Accept

NRW are currently finalising the next iteration of the River Basin Management Plans which will set out a comprehensive overview of all our waterbodies, the pressures and the suite of measures required to deliver water quality improvements.

It is only by working together we can tackle the multiple risks that our water bodies lakes face e.g. Hafren Dyfrdwy collaborative projects:

Vyrnwy - Restoring peat bogs and other key habitats including dry heath, blanket bog, wild flower meadows, ffridd and woodlands at scale on the Vyrnwy estate with RSPB Cymru. We are working together to develop a programme of improvement works which will benefit a number of key species on the site that are of national importance. These include Hen Harrier, Merlin, Black Grouse, Red Grouse, Curlew and the rare Welsh Clearwing moth.

Pathways for Pearls – Working together with Welshpool, Cyfronydd & Guilsfield, Powys Montgomeryshire Wildlife Trust to create a well-connected, wildlife-rich landscape with particular benefit for pollinators and the rare Pearl-Bordered Fritillary butterfly and Minera & Marford quarries, Wrexham partnered with North Wales Wildlife Trust enhanced 60+ hectares of invertebrate & flora habitat.

Financial Implications – This will need to be scoped out depending on level of intervention and/or remediation required across all our waterbodies.

Julie James AS/MS
Y Gweinidog Newid Hinsawdd
Minister for Climate Change



Llywodraeth Cymru
Welsh Government

Llyr Gruffydd MS
Chair, Climate Change, Environment and Infrastructure Committee

10 May 2022

Dear Llyr,

Thank you for your letter of 22 March 2022 which included a copy of your Committee's 'Annual Report on Natural Resources Wales' and requesting a formal response on your recommendations.

Firstly, I want to thank you and the Committee for preparing this comprehensive report and giving me the opportunity to respond. As the Welsh Government's principal adviser on issues concerning Wales's natural resources, it is imperative both Natural Resources Wales (NRW) and Ministers are held to account on the exercise of its legislative functions. Your report made eight recommendations with three of those requesting a response from Welsh Ministers. I have addressed each of these below.

The Minister should set out the timetable for the completion of the baseline review of NRW. The Minister should provide an initial update to this Committee on the review's progress no later than 3 months after the publication of this Report.

NRW presented to the Welsh Government an initial report of its baseline activity set against its budget in November 2021. I must point out that this information came following discussions to agree the 2022/23 budget. Since then, WG officials have been working with NRW to examine the allocation of its resources against its statutory functions and Programme for Government commitments. NRW, working alongside my officials, have agreed to provide further information for consideration by the end of July 2022. This includes those related to the Water Resources (Control of Agricultural Pollution) (Wales) Regulations 2021.

Following this, I will meet with Senior Leaders in NRW to discuss how it will allocate its funding and internal resources to meet its statutory obligations whilst achieving Ministerial priorities for the remainder of the current term of Government from 1 April 2023. This includes reviewing any financial pressures along with funding opportunities for NRW. Therefore, I expect the baseline review will conclude before the end of the 2022/23 fiscal year.

The Welsh Government must ensure that funding for NRW is commensurate with its roles and responsibilities. We expect to see an appropriate increase in NRW funding following the outcome of the baseline review.

The Welsh Government accepts the principle that NRW should receive funding commensurate with its role and responsibilities. Any increases to NRW's funding will be

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Rydym yn croesawu derbyn gohebiaeth yn Gymraeg. Byddwn yn ateb gohebiaeth a dderbynnir yn Gymraeg yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi.

We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.

contingent on robust information being provided before the end of July 2022 and reassurances on the level of service it will provide for the people of Wales.

The Minister should provide further information to the Committee on discussions she is having with NRW about how its funding model might change in the light of the baseline review.

My officials are working with NRW to consider its funding model and how we might provide greater certainty to NRW and over a longer time period. For example, we are considering the funding model which underpins NRW's management of the Welsh Government's Woodland Estate and how we can mitigate the impact of volatility in the timber market. These options will be presented to me, alongside information on NRW's allocation of resources, by the end of July 2022.

Yours sincerely



Julie James AS/MS

Y Gweinidog Newid Hinsawdd
Minister for Climate Change

Agenda Item 5.4

**Pwyllgor Newid Hinsawdd,
yr Amgylchedd a Seilwaith**

**Climate Change, Environment,
and Infrastructure Committee**

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Julie James MS
Minister for Climate Change

10 May 2022

Dear Minister,

Exclusion to the UK Internal Market Act for single use plastics

I am writing following the Minister for Rural Affairs, and North Wales, and Trefnydd's letter to the Legislation, Justice and Constitution Committee, dated 28 March 2022, in which she refers to the UK Government's decision to grant an exclusion to the UK Internal Market Act ('the UKIMA') for single use plastics ('SUPs').

Given our ongoing interest in the proposed ban on SUPs, and our continuing calls for clarity on the outcome of intergovernmental discussions concerning a possible exclusion to the UKIMA, we are disappointed not to have received an update from you. To this end, we would be grateful if you could address the questions set out in this letter.

It is our understanding that the exclusion would have been considered and agreed in line with established processes set out in the Resources and Waste Common Framework ('the Framework'). We note that the Framework has yet to be published or made available for parliamentary scrutiny and is the subject of ongoing delay. We are concerned about the lack of transparency in the decision making process, and the reliance on an unpublished provisional Framework as a basis for consideration and agreement of the exclusion.

1. Can you provide an indication of when the provisional Framework for Resources and Waste will be made available for scrutiny and explain the reason for the ongoing delay in its publication?

2. While we acknowledge the request for the exclusion originated from the Scottish Government, it appears the Welsh Government will be relying on the exclusion to progress its proposals to ban SUPs. Can you confirm that this is the case?

3. In the absence of the Resources and Waste Common Framework, can you outline the processes for considering and agreeing the exclusion?

In her letter, the Minister for Rural Affairs, and North Wales, and Trefnydd refers to the Welsh Government's disappointment at the "narrow nature of the exclusion".

4. Can you provide details of the exclusion and explain in what way it is narrower than you and your counterpart in the Scottish Government had hoped for?

The [Process for considering UK Internal Market exclusions in Common Framework areas](#) sets out that the four governments are able to engage the dispute resolution mechanism within the relevant Framework if desired.

5. Can you clarify whether the dispute resolution mechanism was utilised with a view to securing a wider exclusion? If not, why was this?

6. Can you explain whether and how the "narrow nature of the exclusion" will impact on the scope of the proposed ban on SUPs in Wales?

Under the Act, amendments to the schedules containing exclusions require the approval of both Houses of the UK Parliament. The Secretary of State is responsible for ensuring that draft regulations are put before the UK Parliament. Before making regulations, the Secretary of State must seek the consent of the devolved administrations.

7. What discussions have you had with the UK Government about the timing of draft regulations that will give effect to the exclusion?

8. Can you confirm that you will notify the Senedd when the draft regulations are laid before the UK Parliament?

9. Can you confirm that you will seek the views of the Senedd before deciding on whether to give consent to the Secretary of State making the regulations? If so, can you provide an indication of when this is likely to be and what process you intend to follow?

In September 2021, you told us the Welsh Government's response to the consultation on the proposed ban on SUPs, including next steps, would be published in October 2021. Again, in December 2021, you said the response would be published in January 2022. The response is still to be published.



10. Can you confirm the timing of the publication of the response and explain the reason for the ongoing delay?

I should be grateful if you could response to the above as soon as possible, and by 24 May at the latest.

I am copying this letter to Huw Irranca-Davies MS, Chair of the Legislation, Justice and Constitutional Committee.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Llyr', is centered on a light yellow rectangular background.

Llyr Gruffydd MS,
Chair, Climate Change, Environment and Infrastructure Committee

Agenda Item 5.5



The Scottish Parliament
Pàrlamaid na h-Alba

By email only

Llyr Gruffydd MS
Chair,
Climate Change, Environment, and
Infrastructure Committee
Senedd Cymru

**Net Zero, Energy and Transport
Committee**

c/o Clerk to the Committee
Room T3.40
The Scottish Parliament
Edinburgh
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SeneddClimate@senedd.wales

netzero.committee@Parliament.Scot

9 May 2022

Dear Llyr,

I am writing to inform you of activity of the Scottish Parliament's Net Zero, Energy and Transport Committee in relation to provisional common frameworks.

Background

The Committee has been sent the following common frameworks for consideration by the Scottish Government:

- [Radioactive Substances](#)
- [Air Quality](#)
- [Best Available Techniques/ Industrial Emissions \(BAT\)](#)
- [Ozone Depleting Substances and F-gases](#)
- [Chemicals and Pesticides](#)

At its meeting on 19 April 2022, the Committee agreed to seek written evidence on these frameworks via a call for views. The call for views can be found below:

[Net Zero, Energy and Transport Committee: Environmental Common Frameworks](#)


The Committee will consider the responses before determining its next steps. I would be most grateful if you were to share this call for views with your networks.

The Committee has also agreed to hold an evidence session with environmental bodies and regulators in Scotland to hear about their priorities for the session, which we anticipate will touch on the policy areas covered by the frameworks.

I would be most grateful if you were able to share details of any work you have done on any of these common frameworks.

Please do not hesitate to contact us should you require further detail on our work.

Yours sincerely,

A handwritten signature in blue ink, appearing to read "Dean Lockhart". The signature is fluid and cursive, with a large initial 'D' and 'L'.

Dean Lockhart MSP
Convener
Net Zero, Energy and Transport Committee

Dean Lockhart MSP,
Convener, Net Zero, Energy and Transport Committee
The Scottish Parliament

19 May 2022

Dear Dean,

Thank you for your letter, dated 9 May 2022, informing us of your Committee's work in relation to provisional Common Frameworks.

I am pleased to be able to update you on the work of Senedd Cymru's Climate Change, Environment and Infrastructure Committee ('the Committee') in relation to the provisional Common Frameworks that fall within our remit.

Given the Committee's other work commitments, and pressures on its timetable, we agreed to prioritise scrutiny of the following provisional Common Frameworks: Air Quality, Chemicals and Pesticides, Resources and Waste, and UK Emissions Trading System.

The Committee held an oral evidence session with the Minister for Climate Change on 17 February 2022 to inform its scrutiny of the provisional Common Frameworks for Air Quality, and Chemicals and Pesticides. We subsequently wrote to the Minister to ask for further information and/or clarification on a number of issues.

I am pleased to be able to share with you [our report, Common Frameworks – Report 1: Provisional Common Frameworks for Air Quality, and Chemicals and Pesticides](#), which was published yesterday.

Although the Committee did not undertake detailed scrutiny of the provisional Common Framework on Radioactive Substances, we wrote to the Minister seeking a response on a number of questions. The exchange in correspondence has been published on Senedd Cymru's website. For ease of reference, the relevant links are below:

<https://business.senedd.wales/documents/s123485/Letter%20from%20the%20Chair%20to%20the%20Minister%20for%20Climate%20Change%20in%20relation%20to%20the%20Provisional%20Common%20Frame.pdf>

<https://business.senedd.wales/documents/s124314/Letter%20from%20the%20Minister%20for%20Climate%20Change%20to%20the%20Chair%20in%20relation%20to%20Provisional%20Common%20Framework.pdf>

I hope you find this information useful.

It would be helpful if you could share with us the outcome of your work in due course.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Llyr', is centered on a light-colored rectangular background.

Llyr Gruffydd MS,
Chair, Climate Change, Environment and Infrastructure Committee

Croesewir gohebiaeth yn Gymraeg neu Saesneg | We welcome correspondence in Welsh or English.

Julie James MS
Minister for Climate Change

18 May 2022

Dear Minister,

Provisional Common Frameworks for Air Quality, and Chemicals and Pesticides

Thank you for your letter, dated 5 April 2022, in relation to the provisional Common Frameworks for Air Quality, and Chemicals and Pesticides.

I am pleased to attach a copy of the Committee's report, Common Frameworks - Report 1: Provisional Common Frameworks for Air Quality, and Chemicals and Pesticides, which has been laid before the Senedd today.

I hope you will be able to accept our recommendations and pursue the necessary changes with your counterparts in the other UK governments before finalising the Frameworks.

I look forward to receiving a response from you in due course.

I am copying this letter to Huw Irranca-Davies MS, Chair of the Legislation, Justice and Constitution Committee.

Regards,



Llyr Gruffydd MS,
Chair, Climate Change, Environment and Infrastructure Committee

Croesewir gohebiaeth yn Gymraeg neu Saesneg | We welcome correspondence in Welsh or English.

The Baroness Andrews OBE,
Chair, Common Frameworks Scrutiny Committee
House of Lords

19 May 2022

Dear Baroness Andrews,

I am writing to share with you Senedd Cymru's Climate Change, Environment and Infrastructure Committee report on the provisional Common Frameworks for Air Quality, and for Chemicals and Pesticides.

The report includes several recommendations for amendments to the Frameworks, which may be of interest to you in the context of your ongoing scrutiny of matters relating to Common Frameworks.

If you require any further information, or would like to discuss the content of our report, please feel free to contact me.

Yours sincerely,



Llyr Gruffydd MS,
Chair, Climate Change, Environment and Infrastructure Committee

Croesewir gohebiaeth yn Gymraeg neu Saesneg | We welcome correspondence in Welsh or English.

Geraint Davies MP,
Interim Chair, Environment, Food and Rural Affairs Committee
House of Commons

19 May 2022

Dear Geraint,

I am writing to share with you Senedd Cymru's Climate Change, Environment and Infrastructure Committee report on the provisional Common Frameworks for Air Quality, and for Chemicals and Pesticides.

The report includes several recommendations for amendments to the Frameworks, which may be of interest to you in the context of your Committee's scrutiny of the DEFRA Common Frameworks.

We await the outcome of your work with interest. It would be helpful if you could share your report with us when it is available.

If you require any further information, or would like to discuss the content of our report, please feel free to contact me.

Yours sincerely,



Llyr Gruffydd MS,
Chair, Climate Change, Environment and Infrastructure Committee

Croesewir gohebiaeth yn Gymraeg neu Saesneg | We welcome correspondence in Welsh or English.

Agenda Item 5.6

**Pwyllgor Newid Hinsawdd,
yr Amgylchedd a Seilwaith**

**Climate Change, Environment,
and Infrastructure Committee**

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Julie James MS
Minister for Climate Change

10 May 2022

Dear Minister,

At our meeting on 28 April 2022, we held evidence sessions with stakeholders to inform our ongoing work on decarbonisation of housing. During the sessions, we touched upon the importance of improving home energy efficiency as a means of reducing energy costs. Following the meeting, we discussed the recent, dramatic rise in energy costs arising from the energy price cap increase in April 2022. The Committee agreed I should write to you to express its concern about the impact of this on households in Wales, in particular lower income households.

We are aware of the Welsh Government's ongoing work to improve home energy efficiency and tackle fuel poverty, and of its ambitions to accelerate renewable energy development as a means of improving domestic energy security and safeguarding against energy price shocks. However, the ongoing energy-price crisis calls for immediate action to support households who are struggling with unaffordable energy bills.

We note the Welsh Government has already introduced a series of measures to mitigate the impact of rising energy prices on households, including increasing the Winter Fuel Scheme payment and widening the eligibility criteria for the Scheme, and providing a council tax rebate for some households. Although these may have cushioned the blow for some, they are unlikely to be of much comfort to those already living in fuel poverty and may not be sufficient to prevent the sharp increase in fuel poverty that has been forecast.

Added to the above, we know that the worst is yet to come, with a second cap increase in October 2022, predicted by some analysts to be 32%. We would welcome an explanation from you about how

you are preparing for this further increase, including details of additional measures you intend to put in place to support households through, what will inevitably be, a challenging winter.

We acknowledge that the UK Government holds many of the key levers to ensure appropriate financial support is available to households who are struggling to afford their energy bills. We are aware that the Welsh Government has already made its position clear on the need for a windfall tax on excessive profits made by big energy companies. Recent reports about the eye-watering quarterly profits of these companies, for example, BP's £4.9bn, add weight to the argument for such a tax. We seek clarification from you that you are continuing to pursue with the UK Government the introduction of a windfall tax.

We understand that the Equality and Social Justice Committee will be publishing a report on fuel poverty imminently. We would not wish to pre-empt the Committee's findings. Instead, we hope this letter compliments its report and adds weight to any recommendations for additional action to support households through the current energy-price crisis.

I should be grateful if you could response to the above as soon as possible, and by 24 May at the latest.

Yours sincerely,



Llyr Gruffydd MS,
Chair, Climate Change, Environment, and Infrastructure Committee



Llywodraeth Cymru
Welsh Government

Rebecca Evans AS/MS
Y Gweinidog Cyllid a Llywodraeth Leol
Minister for Finance and Local Government

Ein cyf/Our ref: RE/697/2022

Llyr Gruffydd MS
Chair
Climate Change, Environment and Infrastructure
Senedd Cymru

SeneddClimate@senedd.wales

12 May 2022

Dear Llyr,

Inter-Institutional Relations Agreement: Inter-ministerial Group (IMG) for Housing, Local Government and Communities

I am writing in accordance with the inter-institutional relations agreement to notify you of the first meeting of the Inter-Ministerial Group (IMG) for Housing, Local Government and Communities, which will take place on the 24 May.

The IMG will be chaired by the Secretary of State for Levelling Up, Housing and Communities. The Minister for Climate Change and I will represent the Welsh Government at the meeting.

In this virtual meeting we will discuss the IMG's ways of working and Building Safety.

I will provide an update after the meeting.

Yours sincerely,

Rebecca Evans AS/MS
Y Gweinidog Cyllid a Llywodraeth Leol
Minister for Finance and Local Government

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Rydym yn croesawu derbyn gohebiaeth yn Gymraeg. Byddwn yn ateb gohebiaeth a dderbynnir yn Gymraeg yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi.

We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.

Christopher Jofeh 14 May 2022

1. *To what extent is the absence of specific targets for all housing tenures is a block to progress?*

The absence of specific targets is a block to progress, but it is only one of many.

The use of EPCs for setting targets and measuring progress is not helpful, because EPCs were not designed for and are not well-suited for this.

As Wales has committed to achieving net zero, that should be the overarching target for homes, even though not it is not practicable for every home to achieve that. The date by which homes should achieve net zero will influence costs, as is explained in 2. below.

When considering what should be done to decarbonise a particular home, the first question is the extent to which its consumption of heat should be reduced.

We need a minimum standard for fabric energy efficiency that ensures that homes can be heated efficiently and affordably and that mitigates the home's increased demand on the electrical supply system. The standard could be expressed in kWh/m²/year (the total amount of heat required to maintain a comfortable temperature throughout the year). An alternative approach, adopted by the Sustainable Energy Authority of Ireland¹, is to define a maximum rate of heat loss from the home in W/Km². The group I chair is investigating these and other metrics for Welsh Government.

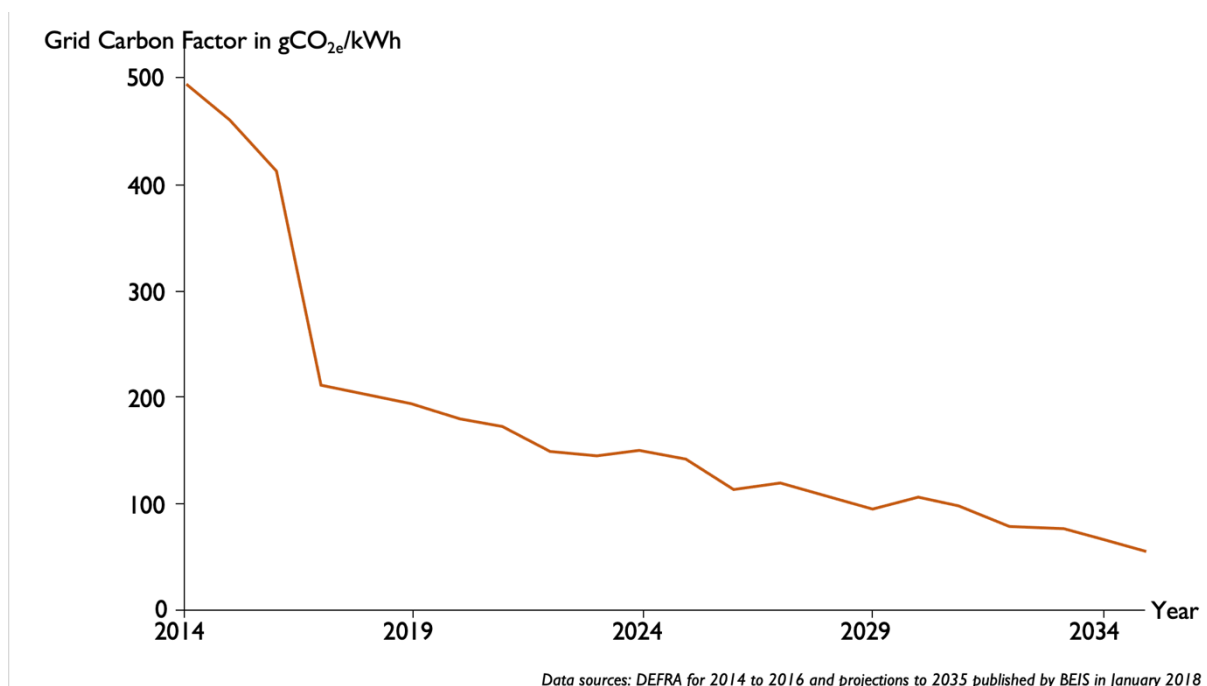
Targets require a means of measuring progress towards achieving them. To that end, Welsh Government and its agents need much better access to smart meter data held by the Data Communications Company than is currently permitted.

¹ SEAI (2020) *Technical Assessment Process for Heat Pump System Grants*, Government of Ireland

2. *To what extent is it feasible for all social housing achieving EPC A or equivalent by 2030?*

Setting every socially owned home on its journey to net zero by 2030 is achievable but it depends on a) the availability of data about every home to inform decisions about how best to decarbonise the home and b) substantial new sources of funding for the sector. Boiler replacement in many homes may not make financial sense until the end of a boiler's life, which could be after 2030.

'Setting every home on its journey' acknowledges the role that future decarbonisation of the electricity grid will make. The chart below shows the past and predicted average carbon intensity of the electricity grid. To make a home net zero in 2022, when the grid carbon intensity is about 150gCO_{2e}/kWh, is clearly harder and more expensive than making the home net zero ready in 2022, with a target date for achieving net zero in say 2035, when the grid carbon intensity will probably be only 50gCO_{2e}/kWh.



Past and predicted electricity grid average carbon intensity

3. *How should the next two phases of the Optimised Retrofit Programme differ to the approach of the earlier phases?*

Social landlords should be required to upgrade some privately-owned homes (both private rented and owner occupied) as well as their own stock.

A frequent criticism by social landlords is that letting ORP contracts in single year phases makes it for them hard to plan and integrate the work into their

normal RMI activities. Consideration should be given to making the next phase of ORP last for two years.

Not every social landlord has taken part in ORP. Some have bid unsuccessfully and some have not even bid. A new approach which shares the funding among all social landlords should be explored. This may involve assistance in bid preparation for those who have been reluctant to bid.

Having social landlords decarbonise some privately-owned homes will generate valuable lessons, but much more work is needed to create an environment in which increasing numbers of private homeowners choose to decarbonise their homes and find it easy to do so well. Accompanying this response are three documents that I prepared last year, describing an approach to private homeowners that is both systematic and based on an established behavioural science framework. The documents are:

1. Approach to owner occupiers.pdf
 2. Homeowner mortgage example.pdf
 3. Small builder example.pdf
4. *How can local authorities and housing associations be encouraged to explore alternative funding streams to support housing retrofit?*

A particular challenge for many HAs is that their ability to borrow more to pay for the retrofit is limited by existing covenants. But even if they could borrow more, their ability to repay the loans is limited because retrofitting homes does not generate increased income. In contrast, borrowing to build new homes does generate more rental income.

When the *Better Homes Better Wales Better World* report was published, I think the reaction of every HA and local authority was that Welsh Government would have to pay for most of the work needed to decarbonise the homes. I believe most HAs now recognise that Welsh Government cannot pay for this, and they are actively exploring alternative funding streams in which a share of the value of energy savings is used to repay long-term off-balance sheet lending. Welsh Government can support this by removing, with appropriate safeguards, any obstacles that exist to a housing association becoming its tenants' energy provider and receiving a proportion of the value of the energy savings.

I am not aware of similar efforts by local authorities but perhaps they too are exploring alternative funding streams. Given how under-resourced many LAs are, I would have liked to see DBW taking a lead here, but I am unaware of any such activity. DBW is in the early stages of exploring new funding streams for owner occupiers.

5. *To what extent does the Welsh Government have a clear picture of the skills currently available in Wales, and the skills needed to decarbonise at scale?*

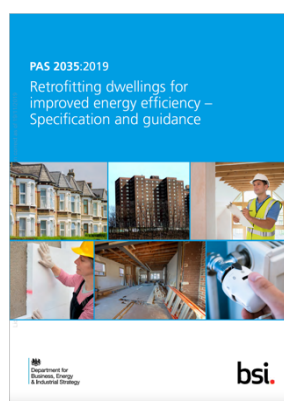
It is very hard to tell if it has a clear picture. It is obvious that Wales will need people to insulate our homes and people subsequently to install low carbon heating in them. I have provided Welsh Government with estimates (by others) for what this would mean both for the whole of Britain and for the Vale of Glamorgan. Welsh Government also knows that Wales needs more surveyors to capture the necessary data about our homes and more people to use that data to assess what each home needs to set it on its journey to net zero. Lack of surveyors and a national survey programme are the immediate blockers to progress.

Even if Welsh Government does have a clear picture, HE/FE colleges will not provide the necessary courses unless they believe there is a pipeline of work that will create the demand for sufficient training to justify the investment required to create the training. Such a pipeline of work requires a) social landlords to solve their funding challenge and b) an environment in which private homeowners are beginning to decarbonise their homes in large numbers.

Accompanying this response is a list drawn up by London South Bank University of retrofit skills that it believes will be needed across the UK:

LSBU RETROFIT SKILLS - DEFINITIVE LIST V2.pdf

6. *To outline any discussion with the Welsh Government about the creation and funding of an independent quality assurance regime for retrofit measures.*



In 2015 UK Government commissioned the *Each Home Counts* (ECH) review. The ECH review called for the establishment of an industry-wide Code of Practice, which resulted in the publication of *PAS 2035 Retrofitting buildings for improved energy efficiency – Specification and guidance*. PAS 2035 is not a new BSI Standard; it is a framework for retrofit project delivery. It is intended to address the fundamental structural problems that have blighted many retrofit projects.

I am unaware of any discussions that Welsh Government has had about the creation and funding of an independent quality assurance regime for retrofit measures. Having said that, ORP is trialling the use of PAS 2035 and in due course lessons will be learned that should inform the creation of a retrofit quality regime.

Owner-occupiers.

The Welsh approach to residential decarbonisation is to start with social sector plus fuel poverty. Why start with socially-owned homes and privately-owned homes in fuel poverty? Looking after the poorest and most vulnerable in society is not simply the right thing to do. It will benefit everyone, because upgrading 300,000+ homes by 2030 will give industry the confidence and the opportunity to invest, to train, to take on apprentices and new staff, to innovate, and to drive down costs. It will provide valuable data on how well different aspects work, which will aid continuous improvement.

The goal is that by the mid 2020s the retrofit ‘offer’ will be attractive to private homeowners, provided that action is taken to ensure that those people have the capability, opportunity and motivation to decarbonise their homes. We need decarbonising a home to be as easy, as desirable and as socially normal as having a new kitchen or bathroom.

There is no silver bullet – change at this scale requires a holistic approach that recognizes that the social and financial challenges are as important, if not more so, than the technical ones.

A focus solely on the actions of owner-occupiers, landlords and tenants neglects the important ways in which the behaviours of these groups are influenced by the actions of other actors in the energy system, such as banks, building societies, builders and builders’ merchants, and others. To help design policies to bring about widespread retrofit it is necessary to adopt a systems approach that recognises the influences that the many different actors have on each other.

The UCL Centre for Behaviour Change has taught the advisory group powerful analytical techniques for identifying what needs to happen so that owner-occupiers and private landlords have the capability, the opportunity and the motivation to decarbonise their homes. These groups are important because between them they own over 80% of all homes in Wales and are responsible for well over 80% of all residential GHG emissions.

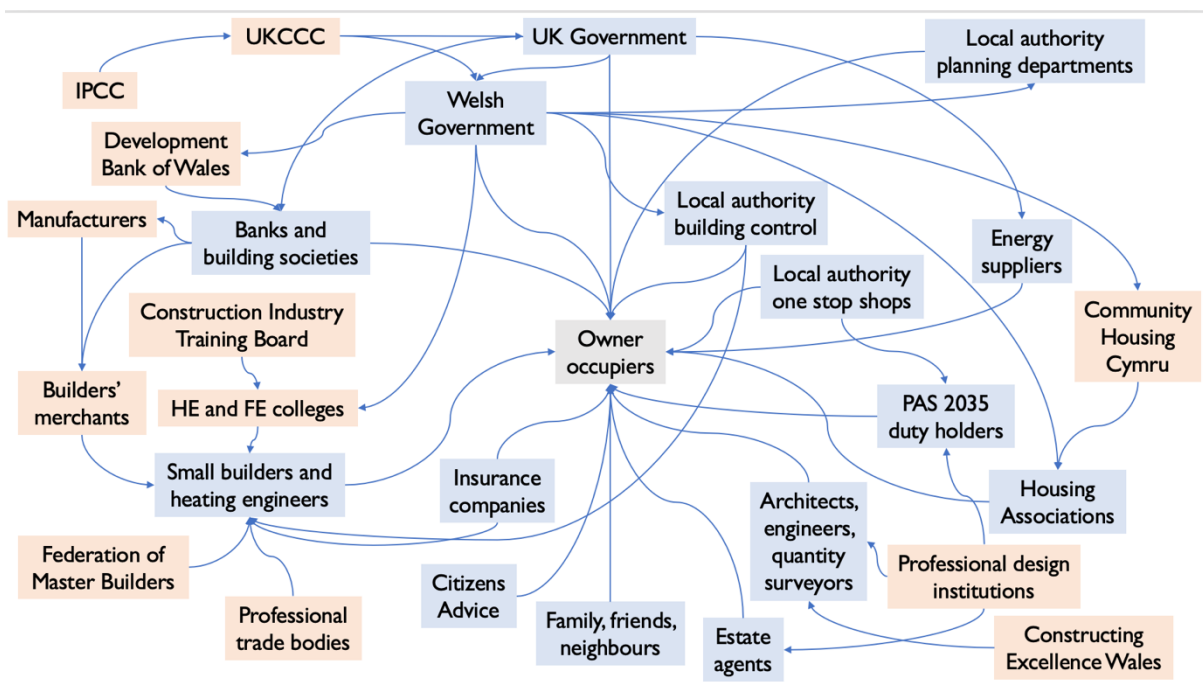


Figure 1. Example of retrofit systems map

The analytical work begins by acknowledging that people do not act in isolation. We are all influenced by the people and organizations with whom we interact. Figure 1 shows just some of the people and organizations that influence the behaviour of owner-occupiers. Those shaded in blue have a direct influence on owner occupiers, and those shaded in pale pink have an indirect influence. There was not room to include all the 'actors': for example, schools, churches, health boards, the Joint Contracts Tribunal and insurance companies, as well as the many voluntary, community and third sector organisations in Wales. The recent Blaenau Gwent Citizen's Climate Assembly has demonstrated how ordinary people can play an important role in determining local priorities.

Next, we need some way of deciding what we want these influencers to do. Fortunately, there is a tried and tested method, developed at UCL, that does just that, called the Behaviour Change Wheel. It informed the advisory group's policy recommendations for Welsh Government, and we now need to use it to identify who needs to do what.



Figure 2. Michie, S., Atkins, L. & West, R. (2014) *The Behaviour Change Wheel – A Guide to Designing Interventions*

The Behaviour Change Wheel uses a model of human behaviour called COM-B, which is an established behavioural science framework to understand the influences on behaviours and develop interventions to change them. Originally developed in the healthcare sector, it is

described in Michie et al (2014)¹. Its application to retrofit is described in Wilson and Marselle (2016)², Murtagh et al (2020)³ and Simpson et al (2021)⁴.

The method begins by identifying a target group whose behaviour we wish to change, and what it is we want them to do differently. The retrofit system map in Figure 1 has owner-occupiers at its centre, but it could just as easily have small builders, or banks, or local authorities.

COM-B

COM-B identifies three factors that need to be present for any **B**ehaviour to occur: **C**apability, **O**pportunity and **M**otivation. (In this it's no different from crime fiction, in which the detective always looks for the person who had the means, motive and opportunity).

Capability refers to a person's physical (strength, dexterity) and psychological attributes (understanding, memory).

Opportunity refers to attributes of the physical environment (finances, policy content, material resources) and the social environment (social norms, culture).

Motivation refers to the reflective (beliefs, identity) and automatic psychological processes (habits, emotions) that drive a behaviour when the capability and opportunity are present.

These three factors form an interacting system with behaviour (Figure 3). If just one of these is not in place, then the desired change will not occur. Therefore it is important not only to remove barriers to the behaviours required, but also put in place targeted enablers to support capability, opportunity and motivation where needed.

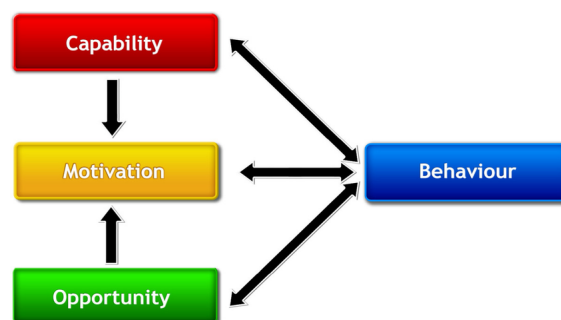


Figure 3. The COM-B model of behaviour.

¹ Michie, S., Atkins, L. & West, R. (2014) The Behaviour Change Wheel – A Guide to Designing Interventions

² Wilson, C. and Marselle, M. (2016) Insights from psychology about the design and implementation of energy interventions using the Behaviour Change Wheel. *Energy Research & Social Science* 19, 177–191

³ Murtagh, N. Simpson, K and Owen, A. (2020) Beyond drivers and barriers: a theoretical framework addressing the engagement of UK construction practitioners in retrofit for energy-efficiency. SEEDS International Conference 2020.

⁴ Simpson, K., Murtagh, N. and Owen, A. (2021) What motivates building repair-maintenance practitioners to include or avoid energy efficiency measures? Evidence from three studies in the United Kingdom. *Energy Research & Social Science* Volume 73. <https://doi.org/10.1016/j.erss.2021.101943>

The COM-B process

This has three stages, but for the sake of brevity only the first two are included in the examples provided.

Stage 1: Understand the behaviour

Step 1. Define the problem in behavioural terms. This means being specific about the target individual, group or population and about the behaviour itself.

Step 2. List candidate target behaviours and select one. Local knowledge and research literature may help choose which to begin with, based on

- a) the likely impact of the behaviour change
- b) the ease of changing the behaviour
- c) the likelihood that the behaviour change will impact other behaviours in a beneficial way
- d) how easy it is to measure the extent to which the behaviour has changed.

Step 3. Specify the target behaviour in appropriate detail: who, what, when where, how often and with whom?

Step 4. Identify what needs to change in the individual, group or population and/or the environment. The more precise this can be, the better the analysis is likely to be.

In the first example, the target group is owner-occupiers, what needs to change is their willingness to borrow to pay for retrofit and the target behaviour is that they apply for an extension to their mortgages.

In the second example, the target group is small builders, what needs to change is their reluctance to undertake retrofit and the target behaviour is that they actively seek retrofit work.

Stage 2: Identify intervention options

Step 5. Identify interventions, which could be to maximise capability, opportunity or motivation.

Nine types of intervention are used in COM-B, and these are defined in Table 1 below.

<i>Intervention type</i>	<i>Definition</i>
<i>Coercion</i>	Changing the attractiveness of a behaviour by creating the expectation of an undesired outcome or denial of a desired one
<i>Education</i>	Increasing knowledge and understanding by informing, explaining, showing and providing feedback
<i>Enablement</i>	Providing support to improve ability to change in a variety of ways not covered by other intervention types
<i>Environmental restructuring</i>	Constraining or promoting behaviour by shaping the physical or social environment
<i>Incentivisation</i>	Changing the attractiveness of a behaviour by creating the expectation of a desired outcome or avoidance of an undesired one
<i>Modelling</i>	Showing examples of the behaviour for people to imitate
<i>Persuasion</i>	Using words and images to change the way people feel about a behaviour to make it more or less attractive
<i>Restriction</i>	Constraining performance of a behaviour by setting rules
<i>Training</i>	Increasing the skills needed for a behaviour by repeated practice and feedback

Table 1. Definitions of intervention types

Guidance is provided in Wilson and Marselle (2016) about which interventions impact which aspects of capability, opportunity and motivation.

Step 6. Identify actions by the public sector and others that support the interventions.

Nine types of action are used in COM-B, and they are defined in Table 2 below.

<i>Public sector actions</i>	<i>Typically characterised by</i>
Communications and marketing	Mass media campaigns, digital marketing campaigns, and correspondence
Environmental and social planning	Architecture, urban and rural planning, object and location design, and planning for housing, social care, employment, equality, benefits, security and education
Fiscal measures	Use of taxation, tax relief and financial incentives
Guidelines	The development and dissemination of documents that make evidence-based recommendations for action in response to defined situations
Legislation	Use of laws, bylaws and similar legislative instruments to set the boundaries for acceptable behaviour with penalties for infringement
Regulation	Development and implementation of rules regarding behaviour that instruct the behaviour and possibly provide rewards and punishments for conforming
Service provision	Provision of services, materials and/or social resource and aids, whether they be structured or ad hoc, financed or unpaid

Table 2. Public sector actions to support interventions

Stage 3: Identify content and implementation options

This stage contains two more steps, the identification of what behaviour change techniques to employ and their modes of delivery. While these are important steps, for the sake of brevity they have been omitted in the worked examples.

Worked examples

The two worked examples are:

1. Welsh homeowner applies for extension to mortgage to pay for retrofit – see Homeowner mortgage example.pdf
2. Small builder actively seeks retrofit work – see Small builder example.pdf

They can be read both from left to right and from right to left.

To understand their creation, they should be read from right to left, beginning with the target behaviour. Adjacent to the target behaviour are the capabilities, opportunities and motivations that would support the target behaviour. To the left of those are some interventions to provide the necessary capabilities, opportunities and motivations, plus suggestions of the organisations that could intervene. And finally, on the left-hand side of the diagram, are some suggested actions by, mostly, the public sector, to support/facilitate/mandate the interventions.

To understand their operation, they should be read from left to right: work begins with actions by the public sector; these influence other actors, such as banks and building societies,

whose interventions, either directly or indirectly, influence owner-occupiers, small builders and other target groups.

A methodical approach requires that all target behaviours by all groups are identified, followed by their COM-B analyses. As the two examples show, there will be a great deal of commonality, particularly in the actions required by the public sector.

Chris Jofeh 13 October 2021

Supporting actions by public sector → Interventions → Factors required for behaviour to occur → Target behaviour

Service provision

Ensure adequate numbers of suitably-qualified consultants, builders and installers – *Training colleges*
 Provide contact information for local suitably-qualified professionals. *LA one-stop-shops*

Communication

Media campaigns to communicate the importance and benefits of improving the energy efficiency of a home, and showing a homeowner what steps to follow:
 National and international benefits - *WelshGov*
 Local and personal benefits and what steps to follow – *LAs and RSLs*

Guidelines

Develop and disseminate recommendations for actions by LAs and others – *WelshGov*

Environmental and social planning

Develop ‘pattern books’ showing locally-appropriate external energy efficiency measures (including finishes) that do not require planning permission – *LA planners with local architects*
 Commission and make available an all-Wales building stock model – *WelshGov*
 Commission research and disseminate findings on critical technical issues including embodied carbon and ASHP refrigerant best practice – *WelshGov*

Legislation

Set mandatory residential minimum energy efficiency standards to be enforced by 2030 and 2040 – *WelshGov*

Regulation

Oblige estate agents and letting agents to provide energy cost information – *WelshGov*
 Define retrofit quality regime – *WelshGov, FMB, professional institutions, RSLs*
 Define conditions under which social landlords may benefit from metered energy savings - *WelshGov*

Fiscal measures

Allocate to Wales sufficient money from the Shared Prosperity Fund to enable decarbonization of I households in fuel poverty – *UKGov*
 Provide clarity about long-term funding arrangements, including creation of a Wales Energy Service Company – *WelshGov*
 Provide guarantees that reduce the interest rates charged on loans for energy efficiency improvements – *Development Bank of Wales*

Education

Provide information about the steps to be followed, likely costs and availability of grants – *Citizens Advice, banks, building societies, LA retrofit one-stop shops, builders’ merchants, small builders & heating engineers*
 Provide information on suitably qualified retrofit consultants, builders and installers – *LAs, builders’ merchants*
 Publish guidance for social landlords - *CEW*

Enablement

Undertake survey and assessment, prepare design – *PAS2035-qualified professional*
 Cost the work– *Quantity surveyors, small builders, heating engineers*
 Provide advice on planning and building control – *Citizens Advice, LAs, architects, small builders, builders’ merchants*
 Provide advice on grant availability – *WelshGov, LA retrofit one-stop-shops*
 Create standard contract between homeowner and RSL for the RSL to deliver energy efficiency improvements – *FMB, JCT and CHC*
 Create standard homeowner/small builder contact – *FMB and JCT*

Persuasion

Communicate the importance and benefits of retrofit – *WelshGov, LAs, mortgage providers, estate agents, health boards*

Modelling

Show examples & outcomes of an owner-occupier going through the retrofit process – *LA retrofit one-stop shops, Citizens Advice*
 Show examples & outcomes of a private landlord going through the retrofit process – *National Landlords Association*
 Show examples & outcomes of a small builder/heating engineer going through the retrofit process – *CEW, FMB*

Environmental restructuring

Contact each homeowner with data that shows how their home’s energy efficiency compares with others in the neighbourhood, and what its potential is – *LAs*
 Demonstrate value of metered energy savings for landlords – *GFI/CEEB/CHC*
 Offer low interest loans for energy efficiency upgrades – *Financial institutions*

Incentivisation

Publish data showing the effect that improving energy efficiency has on the sales price of a home – *WelshGov, RICS*

Coercion

Campaign that describes harmful consequences for our children and grandchildren if we do not tackle climate change - *WelshGov*
 Provide likely energy cost information when a property is offered for sale or rent – *Estate agents and letting agents*

Restriction

Write to homeowners describing the steps that must be followed if they are to be considered for an extension to their mortgage to pay for energy efficiency improvements – *Mortgage providers*

Capability

Homeowner knows why improving a home’s energy efficiency is important
 Knows the steps to be followed (survey, assessment, design, arrange finances, appoint contractor)
 Knows how to carry out each step

Opportunity

Homeowner has time to improve the home’s energy efficiency
 Can afford to do it
 Knows others who are doing it
 Has triggers to prompt action
 Has LA and WelshGov support

Motivation

Homeowner wants to improve the home’s energy efficiency
 Needs to do it (cares about negative consequences of not doing it)
 Believes it would be a good thing to do
 Draws up a plan for doing it
 Anticipates greater comfort, bill savings and possibly enhanced property value

Homeowner applies for extension to mortgage to pay for retrofit

- Key**
 Actions in regular text
Possible actors in italics
CEW – Constructing Excellence Wales
CHC – Community Housing Cymru
FMB – Federation of Master Builders
GFI/CEEB – Green Finance Institute/Coalition for the Energy Efficiency of Buildings
JCT – Joint Contracts Tribunal
LA – Local authority
RSL – Registered social landlord

Service provision

Ensure adequate numbers of competent consultants, builders and installers – [AoC](#), [CITB](#), [DfE](#), [GAAP/IfATE](#), [GJT](#), [HE/FE colleges](#)

Provide contact information for local competent consultants, builders and installers – [LAs](#), [builders' merchants](#)

Guidelines

Develop and disseminate recommendations for retrofit actions by local authorities and others – [UKGov](#), [devolved administrations](#)

Fiscal measures

Allocate to HAs and LAs sufficient money to enable decarbonization their homes and to resource Building Control for enhanced retrofit role – [UKGov](#)

Provide clarity about long-term funding arrangements – [UKGov](#)

Provide guarantees that reduce the interest rates charged on loans for energy efficiency improvements – [National Infrastructure Bank](#)

Extend Enhanced Capital Allowances to fabric and heating measures for privately-rented properties – [H M Treasury](#)

Regulation

Oblige, with penalties for non-compliance, estate agents and letting agents to provide standard energy cost information when a home is offered for rent or sale – [UKGov](#), [devolved administrations](#)

Define retrofit quality regime suitable for small builders working on homes – [UKGov](#), [devolved administrations](#), [FMB](#), [professional institutions](#)

Define conditions under which social landlords may benefit from metered energy savings – [UKGov](#), [devolved administrations](#)

Require building renovation passports to be provided by, say, 2030 when a home is offered for sale – [UKGov](#), [devolved administrations](#)

Communication

Conduct media campaigns to communicate the importance and benefits of retrofit, and showing a homeowner and a builder what steps to follow:

National and international benefits – [UKGov](#), [devolved administrations](#)

Local and personal benefits and what steps to follow – [LAs](#), [Royal Institution of Chartered Surveyors](#), [building societies](#), [banks](#)

Legislation

Set mandatory residential minimum energy efficiency/carbon emission standards to be enforced by, say, 2030, 2040 & 2050 – [UKGov](#), [devolved administrations](#)

Environmental/social planning

Mandate and assist LAs to define the acceptable appearance of external energy efficiency measures – [Chief planners in each nation](#)

Commission and make available building stock models for every LA that requests one – [UKGov](#), [devolved administrations](#)

Commission research and disseminate findings on critical technical issues including embodied carbon and ASHP refrigerant best practice – [UK research bodies](#)

Education – [AoC](#), [CITB](#), [DfE](#), [GAAP/IfATE](#), [GJT](#), [HE/FE colleges and community energy organizations](#), [national retrofit organizations](#), [professional institutions](#), [trade bodies](#), [FMB](#)

Topics to include: the importance and many benefits of residential decarbonisation, why good data about a home is important, the meaning of net zero, setting appropriate targets for a home, what can be done to decarbonize a home, potential costs, avoiding waste, grid decarbonisation, PAS 2030 & PAS 2035, Energy Company Obligation and funding mechanisms in Scotland

Training – [AoC](#), [CITB](#), [DfE](#), [GAAP/IfATE](#), [GJT](#), [Local HE/FE colleges and community energy organizations](#), [national retrofit organizations](#), [professional institutions](#), [FMB](#)

Topics to include: working across trade boundaries, accessing knowledge, how to keep learning and developing, PAS 2030, domestic energy efficiency assessor and retrofit coordinator

Enablement

Lead work to define a national standard for building renovation passports – [Green Finance Institute](#)

Prepare building renovation passports – [Retrofit coordinators employed by local community energy organizations](#), [national retrofit organizations](#), [private consultants and small builders](#)

Arrange pilots/field trials of new funding models with early adopters – [Green Finance Institute](#), [NIB](#), [DBW](#), [SNIB](#)

Provide retrofit financial advice - [Citizens Advice](#), [banks](#), [building societies](#), [accountants](#)

Provide new retrofit funding models – [Banks](#), [building societies](#), [supported by NIB](#), [DBW](#), [SNIB](#)

Persuasion - [LAs](#), [Local health trust/board](#), [Local chamber of commerce](#), [FMB](#)

Show how undertaking retrofit work will benefit the builder, its staff, its customers and the local community

Create annual local retrofit award schemes that celebrate best practice

Provide information from credible sources that builders would look up to

Show SMEs and homeowners examples of successful residential retrofits

Environmental restructuring

Develop 'pattern books' showing locally-appropriate external energy efficiency measures (including standard construction details and preferred finishes) that do not require planning permission – [LA planners with local architects and engineers](#), [professional institutions](#), [FMB](#), [trade bodies](#)

Publish standard homeowner/builder contracts for retrofit – [Joint Contracts Tribunal](#)

Host stock models that enable builders and suppliers to gauge potential local demand for goods and services – [LA](#), [builders' merchants](#)

Fund and staff Building Control to provide retrofit advice and quality control – [LAs](#)

Provide support for small builders completing accreditation paperwork – [FMB](#), [builders' merchants](#)

Provide a steady and assured pipeline of work in the early years – [LAs](#), [HAs](#)

Manage/facilitate work on behalf of private landlords and owner-occupiers - [HAs](#)

Incentivisation

Create annual regional and national award schemes for retrofit projects – [Constructing Excellence](#), [BEIS](#)

Research, field trial and, if successful, roll out council tax/stamp duty changes to encourage decarbonisation – [UKGov](#), [devolved administrations](#)

Coercion – [BEIS](#), [devolved administrations](#), [LAs](#)

Explain harmful consequences for the community and nation, if we fail to decarbonize

Restriction – [UKGov](#), [devolved administrations](#), [LAs](#)

Define enduring policies, set outcomes to be achieved and target dates

Mandate processes to be followed where public money is involved

Defines interim requirements, such as:

- Fabric first
- At no stage may a tenant's bills increase as a result of work done to their home.

Modelling - [LAs](#), [Constructing Excellence](#), [FMB](#), [trade bodies](#)

Provide examples from credible sources that small builders would look up to

Capability

Small builder:

- knows why decarbonisation is important
- knows that residential retrofit is an important part of decarbonisation
- knows where to seek advice
- knows how to carry out the work well

Opportunity

Small builder:

- knows there is a good demand for residential retrofit
- has time and budget to train staff and seek retrofit work
- has the necessary tools to do the job
- knows others who are doing it successfully
- has triggers to prompt action
- has support from others

Small builder actively seeks retrofit work

Motivation

Small builder:

- wants to undertake retrofit
- cares about negative consequences of not doing so
- believes that it would be a good thing to do
- believes that it can deliver a pipeline of profitable work
- develops a plan for winning more retrofit work
- develops a habit of carrying out retrofit work

Key

Actions in regular text

Possible actors in blue italics Acronyms:

[AoC](#) – Association of Colleges

[BEIS](#) – Department for Business, Energy and Industrial Strategy

[CITB](#) – Construction Industry Training Board

[DBW](#) – Development Bank of Wales

[DfE](#) – Department for Education

[FMB](#) – Federation of Master Builders

[GAAP](#) – Green Apprenticeships Advisory Panel

[GJT](#) – Green Jobs Taskforce

[HA](#) – Housing association

[IfATE](#) - Institute for Apprenticeships and Technical Education

[LA](#) – Local authority

[NIB](#) – National Infrastructure Bank

[SNIB](#) – Scottish National Investment Bank

Retrofit Skills - a definitive list of retrofit roles

Data compiled from a variety of academic and non-academic sources; list published in Retrofit Skills: Building the local net zero workforce in the Borough of Lambeth; P Palmer & A Gillich, Revised April 2022

MANAGEMENT

Administrators
Funding / bid managers
Procurement managers
Project Managers
Sustainability Managers
within HA/LA

PLANNING / REGS

Net zero planning

- New build
- Refurbishment
- Retrofit

Circular economy / materials

ADVISORY SERVICES

Citizen campaign developers
Energy efficiency advisors
Customer service / support agents
Financial advisors
Sales representatives
Quality Assurance advisors

TRAINING

Retrofit project management
Low carbon systems training
Heat pump installation training
Inter-trade training
Whole of house training
Retrofit supervisor training

DESIGN

Masterplanning (inc urban
greening / climate proofing)
Architects
Building services
Retrofit programme designers

ASSESSORS

Energy assessors
Retrofit assessors
Retrofit co-ordinators
(PAS2035 compliant)

GREEN FINANCE

Green loan / mortgages

- Product development
- Underwriters
- Advisors
- Administrators

RETAIL / TRADE

Key account managers
Retrofit materials advisors
Material collect / recycle / grade
Re-use & refurb / material suppliers

Retail / trade supply staff

MANUFACTURING

Innovation / funding specialists
Sustainable material developers
HP / PV / battery manufacturers
Insulation manufacturers
Glazing and timber manufacturers
Heat pump distribution

ENERGY

Energy services / tariff designers
Heating engineers

- Gas intall / convert
- Air-source HP installers
- Ground source HP installers
- Hydrogen boiler installers

Solar Thermal / PV installers
Building services engineers
Plumbers
Electrical engineers
Mechanical ventilation engineers
EV charging installers

FABRIC

Bricklayers
Wood & interior carpenters
Double glazing installers
Plasterers
Rooters
Floor layers
Insulation installers

- Cavity wall
- External wall
- Underfloor
- Loft

Drillers
Scaffolders
Sustainable draining

MAINTAIN & MONITOR

Maintenance / conversion

- legacy systems
- New / low carbon systems

Smart meter installers
Digital twinning
Data system design and analysis
Soft landings specialists
Facilities management
Technical monitors

Further information provided by Christopher Jofeh:

PACE loan repayments:

Repayments are collected by the Local Authority via an additional charge on existing property tax (e.g. Council Tax or Business Rates).

Attached is a [document](#) prepared by the Green Finance Institute that provides more information about PACE loans.

Publications provided by Christopher Jofeh

The health impacts of energy performance investments in low-income areas: a mixed-methods approach

Wouter Poortinga, Sarah E Rodgers, Ronan A Lyons, Pippa Anderson, Chris Tweed, Charlotte Grey, Shiyu Jiang, Rhodri Johnson, Alan Watkins and Thomas G Winfield

Health impact, and economic value, of meeting housing quality standards: a retrospective longitudinal data linkage study

Sarah E Rodgers, Rowena Bailey, Rhodri Johnson, Wouter Poortinga, Robert Smith, Damon Berridge, Pippa Anderson, Ceri Phillips, Simon Lannon, Nikki Jones, Frank D Dunstan, Jonathan Morgan, Sandra Y Evans, Pam Every and Ronan A Lyons

Pwyllgor Newid Hinsawdd, yr Amgylchedd a Seilwaith /
Climate Change, Environment and Infrastructure Committee
Datgarboneiddio tai / Decarbonisation of housing
DH06_A

Ymateb ychwanegol gan Dr Ed Green - Ysgol Pensaerniaeth Cymru /
Additional evidence from Dr Ed Green – Welsh School of Architecture

Responses to further questions from the members are as follows:

1. To what extent is the absence of specific targets for all housing tenures is a block to progress?

Targets are clear, but need to be consistent (across tenures) and enforced, or hard to treat properties will just migrate from one tenure to another.

The learning from the ORP and other initiatives (eg IHP) must be disseminated quickly, and publicly, to the whole housing/building industry, and discussed collectively.

2. To what extent is it feasible for all social housing achieving EPC A or equivalent by 2030?

EPC A is hard to achieve (for some types of housing more than others), but that's probably not a bad thing.

EPC A with electric heating needs a whole house approach, the target makes the Landlords move away from the traditional component based approach to a more holistic view.

And it requires renewables in many case – which is great for fuel bills and for tenants.

3. How should the next two phases of the Optimised Retrofit Programme differ to the approach of the earlier phases?

Keep going with a consistent learning, avoid changing the goal posts.

Broaden the range and nature of initiatives that are supported.

There is not one 'correct' solution for all houses and all households.

4. How can local authorities and housing associations be encouraged to explore alternative funding streams to support housing retrofit?

There are opportunities around quality, and compliance with WFGA, which is of great interest to LA and HA.

Provide better clarity on what funding for whom

Making funding more transparent

Work with Rent Smart Wales, communicate the benefits and options to the landlords

Make energy costs for tenants more transparent (as discussed in the session)

Learn from green deal? work thru financial model, build trust

5. To what extent does the Welsh Government have a clear picture of the skills currently available in Wales, and the skills needed to decarbonise at scale?

ORP focuses on PAS2035, it is not clear whether the skills/knowledge to go beyond this (eg looking robustly at quality) are being developed

There are clear tensions between decarb vs fuel bills and quality vs capital cost (again, ref. discussion in session)

slow uptake of retrofit / current capacity of the industry is an issue in that it magnifies the scale of challenge further down the line.

In addition, following on from the discussion in session, I would like to highlight a number of publications for members that specifically connect housing quality and health.

In addition to BRE's 'cost of poor housing' report mentioned in the session, which attempts to quantify the cost to the public purse of poor quality homes in Wales, I have attached publications produced by colleagues within the university on the subject of housing quality and health.

Publications:

The short-term health and psychosocial impacts of domestic energy efficiency investments in low-income areas: a controlled before and after study

Charlotte N. B. Grey¹, Shiyu Jiang¹, Christina Nascimento², Sarah E. Rodgers³, Rhodri Johnson³,
Ronan A. Lyons³ and Wouter Poortinga^{1,4*}

Impacts of energy-efficiency investments on internal conditions in low-income households

Wouter Poortinga, Shiyu Jiang, Charlotte Grey & Chris Tweed

(To cite this article: Wouter Poortinga, Shiyu Jiang, Charlotte Grey & Chris Tweed (2017): Impacts

of energy-efficiency investments on internal conditions in low-income households, Building

Research & Information, DOI: 10.1080/09613218.2017.1314641

Neighborhood Quality and Attachment: Validation of the Revised Residential Environment

Assessment Tool

Wouter Poortinga¹, Tatiana Calve¹, Nikki Jones¹, Simon Lannon¹, Tabitha Rees¹, Sarah E. Rodgers², Ronan A. Lyons², and Rhodri Johnson²

Cohort Profile: The Housing Regeneration and Health Study

Sarah E Rodgers,^{1*} Martin Heaven,¹ Arron Lacey,¹ Wouter Poortinga,² Frank D Dunstan,³ Kerina H Jones,¹ Stephen R Palmer,³ Ceri J Phillips,⁴ Robert Smith,⁵ Ann John,¹ Gwyneth A Davies⁶ and Ronan A Lyons¹

10 Health and social outcomes of housing policies to alleviate fuel poverty

Author: Professor Wouter Poortinga, Welsh School of Architecture, Cardiff University, Bute Building, King Edward VII Avenue, Cardiff, CF10 3NB, Wales, United Kingdom
Poortinga, W. (2019). Health and social outcomes of housing policies to alleviate fuel poverty. In K Fabbri (Ed.) Urban Fuel Poverty (pp. 239-258).

Two articles that show the benefit of housing improvements in Wales (Carmarthenshire) on self-reported health and reducing visits to A&E/hospital:

Emergency hospital admissions associated with a non-randomised housing intervention meeting national housing quality standards: a longitudinal data linkage study

Sarah E Rodgers,^{1,2} Rowena Bailey,^{2,3} Rhodri Johnson,² Damon Berridge,² Wouter Poortinga,⁴ Simon Lannon,⁴ Robert Smith,⁵ Ronan A Lyons²

Social and health outcomes following upgrades to a national housing standard: a multilevel analysis of a five-wave repeated cross-sectional survey

Wouter Poortinga^{1,2*}, Nikki Jones¹, Simon Lannon¹ and Huw Jenkins¹

Follow up questions from the Climate and Infrastructure committee

1. To what extent is it feasible for all social housing achieving EPC A or equivalent by 2030?

It will be best if this question is answered in two distinct parts.

Achieving EPC A. The good news is that it is *technically* feasible for a high percentage of our social housing to be retrofitted to achieve EPC A or equivalent; but for some homes it would not be the best use of limited resources. Unfortunately, for certain property types, due to construction details it will be disproportionately expensive undertaking the final elements of work to achieve what is often a minimal EPC gain. An example of this would be an uninsulated existing ground bearing concrete floor in an older home. Its construction would typically be 100mm of hardcore, 25mm sand, damp proof membrane, 100mm of concrete oversite slab with 50mm sand cement screed. All this would need to be broken out, removed as waste, a further excavation of about 100mm made to accommodate essentially the same construction as previously plus 100mm of rigid insulation below the concrete slab. Perimeter edge insulation would also be used against the walls. We would also need to take out the kitchen units and any ground floor bathroom/WC etc to facilitate the works plus a decant of tenants if the home is occupied. It is generally accepted that about 10% of a home's heat loss is through the floor, so spending several thousand pounds to reduce the heat loss by perhaps 80% takes a budget that could have been used to much greater effect on other carbon reducing measures to other homes or indeed some carbon offsetting.

The whole matter of cost benefit comes into sharp relief when dealing with many hundreds of older solid walled homes. So even if a technical solution exists; it is often better to spend this money on providing new energy efficient homes as there is only so much debt an RSL can take onto the balance sheet. In such cases we would advocate achieving the best EPC level that can reasonably be delivered for a sensible per property budget that represents value for money, perhaps achieving EPC B or in very challenging situations, a high EPC C. The remaining carbon emissions would be offset by over improving newer homes to SAP 100+ or tree planting etc. For this reason, we would not wish to see an overly prescriptive WHQS 2 Standard; but would appeal to Welsh Government to trust RSLs to manage the decarbonisation of our total portfolio by choosing the most appropriate target SAP to be delivered by a

realistic date. For some homes this will be ahead of 2030, for others perhaps 2040. A rigid 'One Size Fits All' standard to be achieved by an immovable date removes the flexibility we require to be excellent stewards of our assets and budgets.

There will of course be some heritage properties (Listed or homes in conservation areas) where to improve the building fabric of the home and/or the addition of photovoltaic panels would not be possible without losing the highly valued character of the property that the legal protection seeks to preserve. However, these will be a very small percentage of the homes within a Welsh social landlord's portfolio and more of a challenge in the Welsh private sector.

Additionally, there will be a small percentage of homes with no legally protected character but nonetheless attractive stone, brickwork or terracotta detailing and these details would be lost with external wall insulation or excessively expensive to recreate using applied brick slips, cladding etc.

Finally, there will be a small percentage of homes that by reason of space limitations make it all but impossible to upgrade the building fabric. An example would be an internal staircase on an external gable wall of a home that requires internal wall insulation to meet the desired standard. This insulation would typically be 60mm-80mm thick and reduce what could be an already narrow stairs to a point that is unsafe, or that prevents the use of a stairlift. There will be instances where homes have a footpath alongside them, perhaps a public footpath between two homes already say 90cm wide would be unreasonably reduced using external wall insulation on both homes (typically 70mm to 100mm thick to each home).

EPC A or equivalent by 2030. Such a short timeline looks unrealistic at present. Whilst the level of decarbonisation grant funding available to RSLs is currently unknown our Balance Sheet is inadequate to support the level of likely funding requirement envisaged. It is not just the initial capital budget that is beyond reach but the Income and Expenditure Account will be significantly negatively impacted by the replacement of capital components that will not yet have been fully depreciated at the point where we need to replace them to reduce carbon emissions. For example, if we need to install internal wall insulation in a kitchen it will necessitate the removal of the kitchen cabinets and worktops and often lead to the need to dispose of that perfectly good kitchen (waste and carbon impact) and provide replacement cabinets to fit a room of reduced size. Additionally, our assets could be financially impaired by our lenders if the cost of decarbonisation at pace causes a negative net present value for the home.

The whole 'No Regrets' ambition of RSLs, to make wise investment that we do not later find requires undoing is undermined by the short timetable. We would also fail

to benefit from the technological improvements that we know will materialise over the coming years if we decarbonise many homes rapidly.

There are also other competing demands for our finite resources. Many RSLs, like us, are stretching their balance sheet capacity to support WG's commitment to deliver 20,000 low carbon social rented homes in this Senedd term. We fully support this commitment as these homes are desperately needed along with other affordable tenures which some RSLs are also providing. We fully recognise and appreciate the capital grant support from Welsh Government, but costs are increasing, development is more complex than ever and the introduction of the Standard Viability Model is increasing the level of private finance which RSLs are having to find to deliver each new home. The increased maintenance and servicing costs associated with new technologies will also fall more heavily on RSLs. Several RSLs are already actively working on major retrofit programmes and inputting their own funds to supplement the support from Welsh Government. Funders are watching closely what proportion of the decarbonisation burden falls on RSLs; if the balance is deemed to be significantly detrimental to RSL Business Plans then the cost and risk of developing new homes will be impacted even further.

Pobl Group, unlike many RSLs has a care and supported living arm and these large, complex buildings in many cases require fire safety works; in some cases £300k per development and this is taking away resources from decarbonisation works.

Many RSLs are finding Western Power Distribution seeking large sums to upgrade their privately owned infrastructure as enabling works for air source heat pumps and PV systems. We have received an initial quote from Western Power to upgrade the electrical infrastructure at Parc Penrhiw, Carmarthenshire to a 3-phase supply at a cost of £234k + legal costs. There is an associated issue relating to the WP transformer for the site which may need relocating on neighbouring land that we do not own, so could involve land purchase costs legal fees for easements etc. We are looking at this in more detail at the moment but if needed that would inevitably lead to additional costs and longer timescales.

2. What are your views on the need for a new independent quality assurance scheme for housing retrofit measures? How should such a scheme be developed?

We already have TrustMark, incorporating PAS (publicly available specification) 2035. This was established as the new quality mark within the retrofit standards framework and is a very comprehensive quality scheme supported by an Industry Code of Conduct, a Consumer Charter and a framework of technical standards for retrofit. So no, we don't need another QA scheme, and some would suggest a 'lite' version of PAS2035 to reduce the cost and complexity of the current standard.

3. How can the financial challenges facing social landlords, particularly in recouping a proportion of the financial saving from energy efficiency measures, be addressed?

The first thing to be mindful of is that there may not be a saving to share if tenants are living in under heated homes. Many will take part or all the saving in comfort rather than cash. Often our tenants will be spending as much as they can afford to heat their home but it will be inadequate get comfortable. As the heat demand reduces following the improvements, they may spend the same amount but finally feel comfortable.

Secondly, the current cost-of-living crisis in part driven by energy prices mean for many tenants paying an increased rent to reflect an improved EPC will not be feasible as they are seeing all other costs rising sharply. Hopefully, we will see inflationary pressures drop significantly in the next two years to reduce these cost pressures for tenants which in turn may allow a formulaic rent model linked to SAP score to be possible. This means currently, recovering any of the cost from low-income households will be very difficult.

4. How does funding for decarbonisation programmes need to change to factor in ongoing maintenance and servicing costs and technology costs e.g. for IES, mechanical ventilation, air source heat pumps.

We are focussed on affordability for our tenants so adding costs to service charges for example is not recommended. Revenue will be needed annually or rolled up as a capital lump at point of install.

These additional cost pressures will need to be added into the standard viability model for new build. As for existing homes that we retrofit some form of annual revenue support grant to be tapered off over say 15 years would help us adjust business models to factor in these costs.

Pwyllgor Newid Hinsawdd, yr Amgylchedd a Seilwaith /
Climate Change, Environment and Infrastructure Committee
Datgarboneiddio tai / Decarbonisation of housing
DH05_AA

Ymateb ychwanegol gan / Additional evidence from Linc Cymru

Follow up questions from the Climate and Infrastructure committee

1. To what extent is it feasible for all social housing to achieve EPC (Energy Performance Certificate) A or equivalent by 2030?

It is technically feasible to retrofit most houses to achieve EPC (Energy Performance Certificate) A or equivalent, however the construction details of certain property types lead to an excessively disproportionate position in terms of cost vs EPC gain to complete the final elements of work. The below example does not include the final elements to push to EPC A but gives an indication of the extent of work required to achieve a high EPC C.

Lincs work under the Optimised Retrofit Programme (ORP) 1 has identified that the traditionally built pre-1919 properties will not achieve EPC A after investing ~£30,000.00 (EEM alone). These properties will achieve a high C rating. However, there will be a significant reduction in the carbon. This property archetype is classed as tough to treat.

For example, a pre-1919 mid terraced property in Baneswell, Newport has the existing energy performance of:

SAP D58
Heat 209kWh/m²/yr
CO2 56Kg/m²/yr

By installing the following Energy Efficiency Measures (EEM) at a cost of ~£30,000.00 (Excluding enabling works):

Intelligent Energy System
Loft insulation top up
Draft proofing / Airtightness
Ventilation
Internal Wall Insulation
Upgraded windows and Doors
Air Source Heat Pump
Hot Water Cylinder
Battery Storage
PV

The energy performance is estimated to be:

SAP C78

Heat 79kWh/m²/yr

CO2 12Kg/m²/yr

The above demonstrates that although the EPC/SAP score is still short of EPC/SAP of A 92 the energy demand and CO2 have been reduced. To take this property to EPC A some extremely intrusive and high cost works for minimal EPC improvement would need to be carried out.

It is important to bear in mind that traditionally built pre-1919 properties represent over a 1/3 of the Welsh housing stock and 80% of existing properties in Wales will still be here in 2050. As a Social Housing Provider, Linc pre-1919 properties represent a 10% proportion of its stock.

The EPC A by 2030 target is ambitious and currently seems unachievable. It places significant financial pressures on RSL's to complete the works, impacting on their ability to invest in new homes, regeneration of communities, broader poverty reduction initiatives, tenant support among other important social measures. Should the target be aligned to RSL business plans and the ability for the supply chains, manufacturers and skilled workforce to be established, RSL's would be able to continue to meet the global needs of Welsh Government and society in general. An alternative option could include setting a target date for carrying out building evaluation / surveys and gathering data on properties by say 2025/6. This would mean that social landlords should be able to demonstrate, by 2025/6 a comprehensive route map to Zero/low Carbon. The ORP funded pilot projects are currently still being explored, and ongoing test and learn pilots due to complete over 2022/2023. Learning from these pilot projects will tie up neatly with the gathering of data on existing properties to truly inform the correct approach and map to achieve zero/low carbon homes.

Having a short target date could place pressure on making decisions that create less significant outcomes for tenants and buildings and harm the building fabric or the manner in which it performs. For example, if we were to rush in and carry out what is high value energy efficiency improvement works such as Air Source Heat Pump installation, only to then understand the gas grid could be utilised for clean/green hydrogen the high-cost installation of the Air Source Heat Pump could have been avoided with a straightforward boiler swap to accommodate hydrogen gas.

2. What are your views on the need for a new independent quality assurance scheme for housing retrofit measures? How should such a scheme be developed?

There is already an independent quality assurance scheme, Trustmark. Trustmark provide the quality assurance for works being delivered in accordance with PAS (Publicly Available Specification) 2035. PAS2035 is a comprehensive retrofit standard specification and a requirement set by Welsh Government for ORP funded projects Linc have worked with a consultancy firm and, to undertake the pre-construction building evaluation works in accordance with PAS2035 alone costs ~£3,000.00 - £5,000.00 per property dependant on pathway, it is highly likely that social landlord decarbonisation projects will fall in Path C which is the higher end of this scale. Project coordination and evaluation are not included within the cost.

Another quality scheme for retrofitting energy efficiency measures is Enerphit. The Passivhaus standard for existing buildings. Linc are currently working on a project with Wood Knowledge Wales, funded through ORP2 which is looking at the difference between Enerphit and PAS2035. This project runs until March 2023 when a true comparison of process, resource and cost can be concluded.

3. How can the financial challenges facing social landlords, particularly in recouping a proportion of the financial saving from energy efficiency measures, be addressed?

There are still several innovative and creative projects exploring the financial challenges as part of the funded Optimised Retrofit Programme. Power purchase agreements could be an option and is a concept currently being explored at Linc. This is where a system, such as PV and Battery are installed on estate. PV and Battery are provided at no cost, including ongoing maintenance and replacement of the system but the energy provided at a fixed cost. The intention to provide a lower energy cost to the resident, some of which could be shared with the landlord. This solution is a win for the tenant as the cost kWh will reduce, the RSL (registered social landlords) can generate an income through sharing the reduced energy cost to the tenant and the 3rd party provider has a continuous income. This would not be suitable for all properties and would depend on the energy generation from the PV.

Solar PV array in-conjunction with agreed fixed energy feed in tariffs such as Octopus energy, could in theory recoup an income whereby some of the energy generated by technologies are not used by the resident. So, if for example a user does not require the amount of solar which has been generated, and the battery is at capacity. The sale back to the grid could be an income retained by each individual social landlord and utilised to repay some of the initial and ongoing costs for the technology. It is important to note, that feed in tariffs is well below what the cost per kWh is charged by the energy company, sometimes between 20-30p kWh difference. This presents a challenge as the feed in will not be significant to recoup all associated costs and if a

user's energy demand is high, there is a possibility that there will be no costs recouped. There is also the complexity around the resident having an agreement with both the RSL (registered social landlords) and energy company for supply charges and feed in repayments.

I reiterate that there may not be any financial savings to share, depending on how energy is consumed within the property. The cost-of-living crisis is something that needs to be looked at in conjunction with energy improvements and potential savings. Increasing the rent to cover any EPC gain only transfers the affordability issue to rents rather than energy.

4. How does funding for decarbonisation programmes need to change to factor in ongoing maintenance and servicing costs and technology costs e.g. for IES (Intelligent Energy Systems), mechanical ventilation, air source heat pumps.

Funding for installation on new technologies should consider the whole life cost and not the initial upfront installation cost. This should include maintenance regimes in line with manufactures recommendations and subsequent complete removal and disposal. Costs would also need to consider improvements or alterations to network connectivity, an increasing demand for smart technologies will necessitate improvement to the communications networks. To run a gateway for the ORP2 programme it would cost an initial set up charge of £80,000 covering 344 properties, with an ongoing cost of £6,000.00 p/y This would be to receive the information from the IES (Intelligent Energy Systems). The later ongoing charge equates to an additional £17.44 per property per annum. This may be a small cost but coupled with the ever-rising inflation costs and need to retrofit at scale. This figure again highlights that the initial install being c30k per property is one issue, but the continuous upkeep and associated costs also need to be factored in. If these were all added to rental income, it would put residents into further poverty which is a what we strive to avoid. Similarly, if these were added in as service charges there could be affordability issues for our tenants.

1. To what extent is it feasible for all social housing achieving EPC A or equivalent by 2030? With the current funding model, work plan, skills and supply chain, having all social housing achieving EPC A or equivalent by 2020 is not feasible. Having said that, it would technically be possible if multiple of these factors changed.

Each property requires a different level of energy efficient measures and thus a different level of investment to be upgraded to EPC A or equivalent. Some homes require substantial measures and investment which may outweigh the value of the home. For example, a property could be valued at £150k and the upgrades cost £70k. After all measures, the property may only be worth £170k. It will take a long time to recover the total costs of upgrading the energy efficiency. There are other properties with mitigating factors such as being heritage assets or located within a conservation area. For these properties to achieve EPC A will require significant investment that again, will be very difficult to recover. The cost benefit analysis for these projects does not add up.

Another cost consideration is the knock on effect of the replacement of building elements such as windows, roofs, kitchens, bathrooms etc to install energy efficiency measures. These elements are capitalised with payback periods and if they are required to be upgraded before they are due, this will adversely impact the housing associations' financial modelling and budgets. This is not to say that they shouldn't be upgraded, but the deadline of 2030 accelerates many of these routine upgrades that makes it less feasible.

The material cost increases affect retrofit projects but also new build developments. Housing associations have committed to building new homes to EPC A, but the material cost increases has strained financial modelling. If the retrofit energy efficiency upgrades are expected to every home before 2030, the current financial modelling will break without further funding.

Other factors to consider include the logistical difficulties of all housing associations in Wales looking to install largely the same energy efficiency measures to all social houses in the next 7-8 years. We are already experiencing skills shortages and supply chain issues on a small scale and these will be exacerbated when the workflow increases to have all homes meet the target by 2030.

2. What are your views on the need for a new independent quality assurance scheme for housing retrofit measures? How should such a scheme be developed?

In our opinion, there isn't a need for a new independent quality assurance scheme for retrofit measures. We think this would add a layer of complexity that isn't required considering the PAS 2035 standards of TrustMark. There is already an industry accepted quality standard. It may be worth slightly altering PAS 2035 to reduce cost and reduce complexity for those looking to meet these standards.

3. How can the financial challenges facing social landlords, particularly in recouping a proportion of the financial saving from energy efficiency measures, be addressed?

The financial challenges, particularly recouping proportion of the financial saving, are significant. If the energy efficiency measures have been installed on a poorly performing

home (e.g EPC E,F or G) there will most likely be a significant cost to installing these upgrades.

Residents may have chosen not to heat their home because of affordability when it was inefficient, but with the upgrades they choose to spend the same amount but have their home more comfortable.

It would most likely not be possible for housing associations to increase rent on homes because of the improved EPC rating in an attempt to recoup potential savings, considering the increase in energy prices and cost of living crisis.

One possible way the financial challenges could be addressed is by increased monitoring of the energy efficient homes. This will give more of an indication of energy use and resident behaviour rather than measuring energy efficiency with an EPC rating. This would potentially allow savings to be partially recouped as it would show if there have been savings, but residents would be reluctant to 'give up' savings they have. Also, there may be concerns around monitoring behaviour and energy usage in a property.

4. How does funding for decarbonisation programmes need to change to factor in ongoing maintenance and servicing costs and technology costs e.g. for IES, mechanical ventilation, air source heat pumps?

It is not possible for us to add on maintenance costs of the new technologies to service charges as there is already pressure on budgets and on tenants' affordability. The additional costs are included in the financial modelling and absorbed in the standard viability of a new project. Funding in the form of a support grant for the retrofit properties that tapers off over time would be beneficial.



Decarbonisation of housing in Wales

1. How suitable are Energy Performance Certificates (EPC) as the metric to chart progress? What alternatives could and should be considered?

- a. **EPC's are viewed as not-fit-for-purpose** because they estimate the cost of energy rather than the carbon impact. EPC's therefore do not always align with zero carbon measurements. Under this measurement, it is possible that a property supplied by gas will achieve a higher EPC rating than one with a heat pump because electricity is more expensive than gas.
- b. **More research would be helpful ahead of detailed targets:** The *Better Homes, Better Wales, Better World* report recognised the limitations and suggested some alternatives or work on the environmental section of EPCs. More research would be helpful and we understand that this is work that is being looked into by the Decarbonisation Implementation Group (DIG).
- c. **Building in flexibility as technology and approaches change is important:** The wording: *EPC A 'or equivalent'* is important, as this, for example, would include passivhaus homes which are zero carbon but not EPC A.

2. What are the potential advantages and disadvantages to continuing an area-based approach to retrofit measures, as with the previous Arbed scheme?

- a. **Good community relations:** The area based scheme by its nature reaches everyone. Some of our members have stated that it fosters cohesive communities and good relationships between neighbours – as everyone in the area is able to receive energy efficiency improvements
- b. **It catches those that fall between schemes or whose situations are changing,** for example, those who may be living in fuel poverty but are not eligible for Nest. In-work poverty is rising and many tenants are not on means-tested benefits, meaning they're not eligible for Nest even though they may be living in fuel poverty. The Arbed scheme tackled this problem. A

further example includes elderly people who only receive a small pension and don't have the money for improvements. Melin Homes has reported that Arbed made a huge difference to thousands of people.

- c. **Identifying the right areas is key:** Some learning from Arbed is that an area-based approach could be more effective if a more sophisticated means of identifying the right areas were adopted. Poor quality housing is a contributor to fuel poverty and it has hugely negative effects on health. If areas could be chosen that take this into account, there is a better chance of targeting those living in fuel poverty.

3. To what extent is the Welsh Government sharing learning from the Optimised Retrofit Programme more widely with the housing sector, and how this could be improved?

- a. **There is much more to be done. We want to play our part:** CHC is organising a webinar with the Welsh Government and the Active Building Centre to support the sharing of ORP learning. We have also been part of sector wide peer to peer learning programmes such as communities of practices to support colleagues to share experiences. We are not aware of any other channel which is sharing the learning from the programme.
- b. **Whilst learning as you go is key our members say that it is still early days:** Longer 'lead' periods are needed for grant funded demonstration projects. They are currently at a survey, tender and mobilise stage for the schemes.
- c. **Whilst sharing knowledge with the housing sector is crucial we must not forget the importance of cross sector learning:** this could be a helpful way of building understanding in the supply chain and getting upstream of any problems and issues.

4. What are the potential risks of imposing higher energy efficiency standards on private landlords, particularly in light of the current cost of living crisis, and how these can be mitigated?

N/A

5. What should local authorities' role be in supporting property owners to improve the energy efficiency of their properties?

N/A

6. How can local authorities and housing associations be encouraged to explore alternative methods of financing?

- a. **We recognise decarbonisation is a huge investment and a blended approach is needed:** the [Future Generation Commissioners report](#) estimates the cost for social housing to be £5.5bn.
- b. **Housing associations cannot do this alone.** They are facing cumulative pressures on their business plans, they cannot scale up their routine maintenance investment (RMI) or be able to access traditional borrowing at the level that will be required to meet this challenge. Significant subsidy, an achievable time period for work, plus off-balance sheet financing mechanisms are necessary.
- c. **We need a proper research programme to develop a range of off balance sheet financing options which can sit alongside government investment.** There are a number of interesting ideas about how we might do this which include the Welsh Energy Services Company proposed by the Future Generations Commissioner and New Economics Foundation and others from our membership. It is essential that this work is prioritised ahead and that a blended funding model is in place ahead of any new standards imposed on the sector.
- d. **We understand it is complicated. We are trying to do something huge in Wales by decarbonising housing quickly.** What's most critical during the next few months is to move forward quickly on developing a firm plan, a roadmap that creates confidence and encourages our members to think creatively about the part they can also play to create a credible funding package.
- e. **It is positive to see the final Welsh Government budget allocate an additional £35m FTC on top of the £72m general capital already allocated in the draft budget to explore funding models.** It will be used to test and develop new funding models to help accelerate the scale and pace of the decarbonisation of Welsh homes.
- f. **We have had some positive early conversations with Welsh Government officials to speed up a research programme to explore a range of off balance sheet financing models and work them up.** We established a Financing Decarbonisation Task & Finish group to begin this discussion and will aim to feed in our expertise into Welsh Government - who are keen to move things forward at pace. We welcome this.
- g. **This work is crucial. Housing associations cannot be expected to respond to a new standard and target without a workable funding**



mechanism in place. The Welsh Government must commission detailed research and development to work with the sector to explore off balance sheet funding mechanisms. This needs to be completed and a longer term funding package in place well before any new standards are introduced.

7. To what extent does the Welsh Government have a clear picture of the skills currently available in Wales, and the skills needed to decarbonise at scale?

- a. **The Welsh Government and Data Cymru [report](#) provides a high level snapshot of the skills needed** - e.g. 10,700 workers and specialists, 2,500 construction managers, 2,800 plumbers, 1,400 labourers, 800 retrofit co-ordinators. ('The labour market of tomorrow', March 2022).
- b. **It's hard to say with firm confidence that the Welsh Government has grasped what skills currently sit within the social housing sector, even if the desire to understand is there.** There's more work needed between the Welsh Government and our sector to get there.
- c. It will be interesting to see how the WG's new body, [Net Zero Industry Wales](#), will support Welsh industry to decarbonise and create new jobs in the green industries of the future.

8. To what extent do businesses in Wales have the requisite skills to support the challenge of housing decarbonisation. What more should the Welsh Government be doing to encourage the development of green skills?

- a. **It is in our interests as a nation to make sure that we meet this challenge.** The opportunity to create local good quality jobs and support SMEs is huge.
- b. **We will only do it with some certainty and a longer term plan.**
- c. **Housing associations can play an important role through in-house teams and relationships with local suppliers.** This should be a valuable asset to support and enable the decarbonisation of homes, provided that such workforce are equipped with the appropriate skills and knowledge. E.g those teams can help with things like exterior wall insulation, installing solar panels and battery storage, installing and servicing air source heat pumps.
- d. **Ultimately, ensuring Wales has the pipeline of skills needed is going to happen through partnership** - across our own sector, with the Welsh Government, and with other institutions and bodies in the community.

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Submitted by email to SeneddClimate@Senedd.Wales

12th May 2022

Dear Llyr,

Debate on the Climate Change, Environment and Infrastructure Committee report: report on the Welsh Government's marine policies

Ahead of next week's debate on the CCEI Committee report on the Welsh Government's marine policies, please find below some brief comments by RSPB Cymru on some of the recommendations put forward and the Welsh Government's response. I hope that you will find this information of use. If you have any questions regarding these comments, or if I can be of any further assistance, please do get in touch.

Yours sincerely,

Emily Williams
Senior Marine Policy Officer
RSPB Cymru

Cymru

Specific recommendations of the report of the Welsh Government's marine policies	Welsh Government response	RSPB Cymru comments
<p>1. The Committee recommends that the Welsh Government should commission an external analysis of the Wales National Marine Plan to inform its own review later in 2022.</p>	<p>Response: Agree in principle Welsh Government will this year report on the effectiveness of the Welsh National Marine Plan. We have collaborated with stakeholders to develop the plan monitoring framework and indicators against which to assess progress to ensure the report will be based upon on objective analysis of the available evidence. Given the recent introduction of the marine plan we anticipate limited evidence being available to inform a thorough assessment of progress. We agree in principle with the approach suggested in this recommendation and will commission an external analysis to inform the next statutory report.</p>	<p>The Welsh Government's response states that it will "report" on the Welsh National Marine Plan. It does not provide sufficient reassurance that it will "review" marine planning to address the concerns highlighted in the Committee report:</p> <p>"...now is the time to consider whether the plans and strategies the Welsh Government currently has in place will continue to be fit for purpose in the light of the expected increase in development."</p> <p>"Stakeholders made a persuasive argument that the Welsh Government should commission an initial external review of the Plan"</p> <p>"Environmental stakeholders criticised strongly several aspects...particularly the lack of a spatial approach. However, we note the comments from the Welsh Government about the adoption of a more spatial approach, including Strategic Resource Areas. These, and other related matters, should be considered as part of the initial external review."</p> <p>RSPB Cymru are advocating for a spatial and holistic Marine Development Plan that would sit alongside the policies contained within the Welsh National Marine Plan.</p>
<p>5. The Committee recommends that the Welsh Government should update the Marine Energy Plan to reflect its ambitions and intentions in this policy area.</p>	<p>Response: Accept in principle The Welsh Government will review the Marine Energy Plan for Wales to consider whether and how it needs up-dating to reflect the latest position.</p>	<p>We urge any review of the Marine Energy Plan to fully consider all of the Welsh Government's priorities and ambitions for the marine area holistically, for example those for fisheries, aquaculture, conservation and so on. An update of the Marine Energy Plan should also consider the cumulative impacts of all activities in Welsh waters. This should then inform further development ambitions. A Marine Development Plan would enable this.</p>

<p>7. The Committee recommends that the Welsh Government should set out how its end-to-end review of the consenting process will be open and transparent and how stakeholders will be provided with an opportunity to contribute.</p>	<p>Response: Accept Welsh Government is commissioning an independent contractor to undertake an end to end review of marine licensing to ensure it is open and transparent. It is critical that stakeholders have the opportunity to input to the review and this will be an integral part of the process. Stakeholder views are welcome on any aspect of marine licensing delivery, and ways to input these will be agreed with the contractor once in place.</p>	<p>We are grateful to be included in this process as a stakeholder and look forward to working with the now appointed consultant who is looking at the end to end review.</p>
<p>9. The Committee recommends that the Welsh Government should set out how it will deliver on the commitment in the renewable energy deep-dive to identifying priority marine and terrestrial evidence gaps and mechanisms to fill them. This should include information on how such work will be funded.</p>	<p>Response: Accept Welsh Government have been in discussions with NRW and identified the gaps around marine evidence, which largely relates to evidence on interaction between a technology and the environment. We have agreed that NRW will provide a timeline for identifying and filling existing evidence gaps for energy projects on shore through the deep dive process. However, this will be an evolving picture as new technologies are developed and become commercialised. We will continue to implement a spatial approach to marine planning, working with NRW to understand ecological constraints and opportunities. In addition, we will map socioeconomic spatial considerations and identify spatial evidence gaps and mechanisms to fill them as part of marine planning. We will publish a report on addressing strategic baseline evidence gaps for renewable energy technologies, and a series of information notes that will identify topic specific evidence gaps in relation to developing tidal stream energy technologies.</p>	<p>We are pleased to see that the timeline for identifying and filling existing evidence gaps for energy projects shall be brought forward. However, we note there are no financial implications identified alongside the response to this recommendation, which is a concern if the timeline is to lead to action.</p> <p>The report highlighted wider evidence issues (beyond the energy sector) for the marine environment (including monitoring of marine protected areas and fisheries) which we believe warrant further attention. It stated, “the State of Natural Resources Report (SoNaRR 2020) assessment of the Welsh inshore marine area found that “there are various evidence gaps across social, economic (including development) and environmental uses of the marine environment that restrict our ability to ensure sustainable management of marine natural resources”.”</p> <p>We would welcome an update on the following, highlighted in the report: “NRW has been working with the JNCC and other UK nature conservation bodies to consider options for funding a wider programme and it told the Committee: “the favoured option—and we worked with the Welsh Government as well and they supported us on this— ...was for around five times more than we currently have.” This would result in an eight-fold expansion of the monitoring programme. Discussions were now being held with the Welsh Government about how the bid would be taken forward.”</p>

<p>10. The Committee recommends that the Welsh Government should set out how developers can make a greater contribution to the evidence base that underpins marine planning. It should set out how it will remove barriers to ensure that data can be shared while respecting commercial confidentiality.</p>	<p>Response: Accept Marine planning is an evidence based process and developers can make an important contribution towards our understanding of the marine environment and future marine planning. The Welsh Marine National Plan encourages the sharing of evidence and encourages sectors to collaborate to understand opportunities for sustainable development by addressing key evidence gaps. It is important that we maximise learning from developments that are progressed, ensuring new data can feed back into future decision making including the accuracy of predicted effects and how this can inform future assessments. Welsh Government is considering how any barriers to data sharing can best be addressed. We are a part of the UK Productive Seas Evidence Group which has actively considered this matter. We are also supportive of The Crown Estate Marine Data Exchange initiative which makes available data from the marine renewables and aggregates industry. We agree that this matter merits further action and will set out in the next revision of the Welsh Government Marine Evidence Strategy how we can work with industry to take this forwards.</p>	<p>We are pleased to see this response and plans to address the recommendation.</p>
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<p>11. The Committee recommends that the Welsh Government should provide an update on the Welsh Marine Evidence Strategy 2019-22, including any assessment that has been undertaken of its effectiveness, and whether the Strategy will be reviewed or amended in the light of the commitment in the renewable energy deep-dive.</p>	<p>Response: Accept Welsh Government Officials would be happy to provide a mid-term update on delivery of the Welsh Marine Evidence Strategy, whilst acknowledging that the evidence needs identified are not for Welsh Government to deliver alone. The strategy aimed to set the direction and areas of evidence needs required over this six-year period. Welsh Government have reviewed the need to update the Welsh Marine Evidence Strategy 2019-2025 document in light of emerging evidence needs. Officials are content that the overarching strategic evidence priorities still represent the high-level evidence needs including those identified by the deep dive. Progress in delivering the Welsh Marine Evidence Strategy is being monitored through the Welsh Marine Evidence Strategy Panel. Completion of marine, fisheries and aquaculture evidence projects led or contributed to by Welsh Government is also being captured in three internal two-year Evidence Plans, which are reviewed annually and formally evaluated at the end of each plans conclusion.</p>	<p>We are pleased that a panel is monitoring the progress being made to deliver the Welsh Marine Evidence Strategy and would welcome wider stakeholder communication on this, including suggestions on how stakeholders can further contribute towards addressing key evidence gaps. We would like to see an increase in funding for marine evidence within the Welsh Government and NRW. We also strongly recommend that future grant mechanisms provided by the Welsh Government and NRW are designed to enable more revenue spending. The emphasis on capital spend in grants has been a major barrier to most sectors seeking to fund projects in the marine environment, particularly marine evidence projects. Indeed, this has contributed towards the Welsh Marine Action and Advisory Group adopting the following as a key priority for its work going forward: “Sustainable long term investment and developing longer term sources of public and private finance is crucial to support delivery of key objectives”.</p>
<p>12. The Committee recommends that The Welsh Government should bring forward a strategy for Marine Protected Areas. It should focus on the need to take both local and network-scale approaches and to deliver the conservation objectives of individual MPAs, where applicable.</p>	<p>Response: Accept in Principle. I agree with the principles the committee have set out in the recommendation, and I am committed to both local and network scale approaches. At this stage I am not considering a standalone strategy, but rather ensuring the current strategic approach set out in the MPA Network Management Framework is built on and incorporated into our future long term strategies and plans for resilient ecological networks. This includes the Nature Networks Programme and UK Marine Strategy. Our MPA Network Management Framework sets out a clear strategic approach through effective management principles for enhancing the resilience of our MPA network and ensuring features maintain</p>	<p>We believe the introduction of the MPA Management Framework and associated grant scheme was a positive step forward. However, much more remains to be done. The nature of the marine environment often restricts the amount of restoration and active conservation work that can take place. As such, regulatory processes are especially important for the effective management of MPAs. The wider considerations highlighted in this report, such as the need for marine evidence, enhanced marine planning and the introduction of sustainable fisheries measures, are therefore crucial for MPA management.</p>

	<p>or move towards a favourable condition. A number of successful actions have been delivered through the framework and future actions are now supported by the MPA Network Management grant scheme. The committee will be aware the Framework is due for renewal in 2023. Welsh Government will be working closely with stakeholders to review the framework and ensure this can continue being an effective strategic platform for managing our MPA network. Further, I am committed to delivering our MPA network completion programme and I will shortly be setting out my ambitions for the MCZ designation process. Work has progressed significantly to prepare pre-consultation documentation which will support a stakeholder engagement exercise. I would welcome your views once launched and in the forthcoming consultation due to launch in 2023.</p>	
<p>13. The Committee recommends that the Welsh Government should explain the lack of progress on the designation of MPAs and MCZs and set</p>	<p>I acknowledge the delay in delivering this work area which had been impacted by staff redeployment to support our Covid-19 and EU Exit response. However, significant progress has been made to develop all the pre-consultation documents which will enable Welsh Government to launch an engagement exercise with stakeholders. We expect this next phase of work to</p>	<p>We look forward to seeing the next steps on the Marine Conservation Zone progress commence shortly. We wish to highlight that gaps also remain in the network for mobile species, including for foraging areas for seabirds.</p> <p>Management is one of the five main OSPAR* principles of ecological coherence, with Principle 13 of the 2006-3 guidance setting out: "MPAs</p>

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<p>out a timetable for designation.</p>	<p>be launched in the coming months, in collaboration with the Marine Conservation Zone Task and Finish Group.</p>	<p>should be managed to ensure the protection of the features for which they are selected and to support the functioning of an ecologically coherent network”. This approach was highlighted and committed to by the Welsh Government, in a Joint Statement in 2012. As such, designation of MCZs alone shall not be enough for Wales to declare an ecologically coherent contribution to the UK MPA network.</p> <p>* Convention for the Protection of the Marine Environment of the North-East Atlantic</p>
<p>14. The Committee recommends that the Welsh Government should set out how the new approach NRW has developed for site condition assessments will be funded.</p>	<p>Response: Accept I recognise the important role MPA condition assessments have informing our MPA management programme and ensuring achievement of favourable status for our protected features. Welsh Government are exploring the Nature Networks Programme as a potential option for funding feature condition assessments for the Welsh MPA network. Other additional avenues for funding are continuing to be explored.</p>	<p>Nature Networks funding would be a grant project-based approach to funding MPA condition assessments and therefore would not constitute a long-term sustainable financing solution. The lack of core funding available for marine conservation is a major constraint for the sustainable management of natural resources.</p>
<p>15. The Committee recommends that the Welsh Government should set out the latest discussions it has held about the implementation of risk-based marine monitoring programmes across the MPA network, as set out in the MPA 2020-21 Action Plan.</p>	<p>Response: Accept Welsh Government remain committed to a UK wide monitoring programme based on the identified monitoring options to support the whole MPA network. Welsh Government are continuing discussions with the UK and Devolved Governments in how to deliver this.</p>	<p>We are keen to stress that a solution to funding the marine monitoring programme is essential. An update on this would be welcome.</p>
<p>16. The Committee recommends that the Welsh Government should set out its latest plans for the designation of highly protected marine areas.</p>	<p>Following on from the MPA network completion programme, it is important we take the opportunity to revisit our sites and their successes. We aim to assess our network and whether the benefits, such as enhanced ecosystem resilience, and protections we seek are being realised. Welsh Government will</p>	<p>We are pleased that a holistic stocktake of the MPA network will be undertaken. However, we are concerned about timescales. The MPA network completion programme (including MCZ designation) is not yet at consultation stage. Whilst Wales has over 30% of the marine environment in MPAs, we believe much more needs to be done if we are to achieve 30% well-managed by 2030.</p>

	<p>undertake a holistic stocktake and revisit the levels of protection afforded to our sites and whether current management is proportionate and effective. The need, and appropriateness, for areas of higher protection should be considered as part of this process.</p>	<p>On MPAs [PDF, 253KB], the International Union for Conservation of Nature (IUCN) “encourages IUCN State and Government Agency Members to designate and implement at least 30% of each marine habitat in a network of highly protected MPAs and other effective area based conservation measures, with the ultimate aim of creating a fully sustainable ocean, at least 30% of which has no extractive activities, subject to the rights of indigenous peoples and local communities”. MPA categories, as defined by the IUCN, are defined in this guide (PDF, 7260KB). We are calling for an aim of 30% of Welsh seas highly protected and 10% fully protected (IUCN definitions) by 2030.</p>
<p>17. The Committee recommends that the Welsh Government should set out the purpose and timeline for the public consultation on dredging and bottom trawling in Welsh MPAs.</p>	<p>Response: Accept The Welsh Government continues to work with Natural Resources Wales to undertake a structured evaluation of potential fishing gear interactions with features of Welsh Marine Protected Areas (MPAs) referred to as the Assessing Welsh Fishing Activities project. It is expected the last of the towed gear assessments will be completed in summer 2022, after which it is anticipated proposals for any necessary management measures will form part of a public consultation. The timescale for any consultation will be determined alongside other Welsh Government priorities at the time.</p>	<p>The Welsh Government has yet to consult on management of towed gear (including bottom trawling) within MPAs. In contrast, other UK administrations have progressed to the introduction of management measures for all fisheries gears in MPAs and to consider highly protected areas. The Welsh Government has legal duties (for example, under the Habitats Regulations, the Marine Strategy Regulations and UK Fisheries Act) to address this. Further delay on this is also at odds to the commitment to reversing the impacts of the nature crisis. This work must be recognised as a priority to ensure the future sustainable management of the marine environment in Wales.</p>

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		<p>Towed gear assessments (“high-risk activities”) were provided to the Welsh Government by NRW in 2017 as part of the Assessing Welsh Fisheries Activities Project (AWFA). Since then, the absence of a consultation on resulting measures has been the subject of recommendations by former Senedd Committees, urging progress. Wales Environment Link have also written to the Welsh Government regarding this many times. WEL received a response in 2018 which stated that additional resources had been acquired to accelerate this work. Stakeholders were also informed during the Welsh Marine Fisheries Advisory Group (WMFAG) that a consultation on a towed gear order had been drafted in 2018. Yet, a consultation is still outstanding.</p> <p>There is a long history of the Senedd seeking progress from the Welsh Government on this matter. For example, the Welsh Government were urged by Members for a timetable in 2017 and again in 2020. In November 2019, the CCERA Committee recommended that a consultation should be brought forward on management options for high-risk activities by January 2021 at the latest. The response was that the assessment would be completed “as quickly as practically possible” but said a consultation was expected in early 2020. Since then, Members of the Senedd have sought updates on the proposed timetable for a consultation. A written answer to Janet Finch-Saunders MS from March 2021 is very similar to that which the Committee has received to this report in April 2022: “...Officials are exploring potential measures which could be introduced to prevent these bottom-trawled gears from causing damage to protected features, including limiting the use of such gear in specific areas. These measures will be evidence based, proportionate and subject to a 12 week public consultation, although at present I cannot confirm when this will take place.”</p>
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Marine Conservation Society briefing for debate on Climate Change, Environment, and Infrastructure Committee Report on the Welsh Government's marine policies May 2022

Marine Conservation Society (MCS) welcomes the recent report and recommendations from the Wales Climate Change, Environment and Infrastructure Committee on Welsh Governments Marine Policies.

Ahead of the forthcoming Senedd debate on, 18th May, MCS would like to share our initial thoughts on the next steps required to deliver the committee's recommendations for delivering sustainable management of Welsh waters.

Foremost, we would recommend that Welsh Government **sets out a clear Marine strategy, covering this sixth Senedd term** with time bound milestones and deliverables, that demonstrates how the different policy drivers align. **Creating a single overarching strategy will provide clear line of sight to the various components required to deliver effective marine management.** Such a strategy will enable greater collaboration between local stakeholders and actors across public, private and third sector to aid delivery of sustainable marine recovery.

MCS views on Committee Recommendations

Marine Planning (Recommendation 1)

- ***Welsh National Marine Plan Review should consider the need for a statutory, spatial and holistic Marine Development Plan.***

We support the recommendation for Welsh Government to commission an external analysis of the Wales National Marine Plan to inform its own review later in 2022. We would add that **this review considers the need for a statutory, spatial and holistic Marine Development Plan.** This plan would complement, not replace, the existing efforts the Welsh Government is taking to implement a more spatial approach.

Renewable Energy (Recommendations 3, 5 and 6)

- ***The renewable energy deep dive must take into consideration alone and in-combination impacts of human activities on the marine environment.***

- ***The Marine Energy Plan should include recommendations to deliver a just transition for other industries displaced by the deployment of renewable energy in Wales.***

The development of offshore energy must be done in a nature positive way to avoid increasing the threats to an already-degraded marine environment. Therefore, we look forward to Welsh Government reporting on progress to implement the renewable energy deep dive recommendations to the Committee. **The deep dive must take into consideration alone and in-combination impacts of human activities on the marine environment.** The deep dive should also consider the interactions between all elements of the Welsh Government marine work program (e.g. fishing, marine planning), and not report on these elements in isolation.

The updated Marine Energy Plan should include **clear recommendations to deliver a just transition for other industries displaced by the deployment of renewable energy in Wales.** The Economy Minister's statement on offshore marine energy, due on 17th May, is an opportunity to outline how Welsh Government will deliver a just transition.

On the tidal lagoon challenge, as well as the Welsh Government providing an update to the Committee, we ask that full consideration is given to the impacts of such developments on the marine environment and other activities. **Any future plans to develop Tidal lagoons in Welsh waters must be underpinned by a clear Marine Development Plan.**

Marine Evidence (Recommendations 9, 10, 11)

- ***The Welsh Marine Evidence Strategy is holistic in its approach to support cross-cutting themes.***

The Welsh Marine Evidence Strategy must be **holistic in its approach and able to support cross-cutting themes of Welsh Marine Governance**, whilst also ensuring that Wales continues to deliver towards ambitions shared by the four UK administrations to achieve Good Environmental status for UK seas.

We recommend that the Marine Evidence Strategy supports Welsh Government in identifying priority marine and terrestrial evidence gaps and mechanisms to fill them, as promised through the Renewable Energy deep dive.

Additionally, we propose that **future Marine Development licences require pre and post construction monitoring**, to enable how developers can make a greater contribution to the evidence base that underpins marine planning.

Marine Protected Areas (Recommendations 13, 14, 16)

- ***Deliver a MPA strategy, clarifying Welsh Government ambition and include clear management actions.***
- ***Deliver swifter action on future MPA designations.***

We support the recommendation that the Welsh Government bring forward a management strategy for Marine Protected Areas (MPAs). **This strategy should include clear management**

actions for the existing network and, where feasible, any sites considered in the forthcoming MCZ process. Having transparent management actions will enable stakeholders and communities to understand the purpose of each MPA, and aid in the development of clear plans to resolve issues arising from the potential displacement of existing activities. Welsh Government should accompany this strategy, with plans to deliver the continued funding of MPA Management, a process for periodic review and the opportunity for public consultation.

The strategy must also consider the interconnected nature of the sea to human activities on land, providing recommendations addressing issues such as water quality will be resolved at their source, not only at sea. More information on how these considerations will be incorporated into NRW's MPA Condition Improvement Programme would be welcomed.

Recommendation 14, that Welsh Government set out how the new NRW approach for site condition assessments will be funded, is key to delivering an effective reporting process. Welsh Government plans to explore the Nature Networks Programme as a potential funding avenue, is a positive step and we look forward to hearing more soon.

We agree with the committee that Welsh Government set a timetable for designation of future MPAs. **Wales has delayed progressing additional designations for marine protection and we believe action must now be swifter** if we are to address the dual threats of the climate and nature crises.

We welcome Welsh Governments continued commitment to the UK wide monitoring programme but seek clarity regarding what actions will be delivered in Welsh waters.

We are encouraged by the Minister's commitment to undertake a review of existing levels of protection, effectiveness of management, and to consider areas of higher protection as appropriate. Scottish Government is currently developing similar objectives, and we suggest Welsh Government considers the feasibility of such an approach in Welsh waters.

Fisheries (Recommendation 17)

- ***The Assessing Welsh Fishing Activities project must inform the delivery of an ecosystem based approach for the management of bottom towed gear.***

We support Welsh Government delivering a consultation on dredging and bottom trawling in Welsh MPAs. The Minister's response highlights that the Assessing Welsh Fishing Activities project as a necessary step towards any consultations on bottom trawling. We look forward to the results of this project, noting this should inform the purpose and timeline for a public consultation, and where appropriate, consider any fragile habitats outside current MPA boundaries to enable delivery of an ecosystem based management of Fisheries activities.

Any consultation on the future of bottom towed gear should identify where this activity is compatible, the number of boats able to fish at a sustainable level, and should the activity not be compatible in defined areas changes are delivered via just transition.

Blue Carbon (Recommendations 18, 19, 20)

- ***The development of a blue carbon evidence base does not delay or prevent action to protect, manage and restore blue carbon habitats in Welsh waters.***

We welcome all recommendations from the committee regarding blue carbon and are encouraged by the Minister's commitment to engage with this developing area of policy over the course of this session of the Senedd. **We ask that the development of an evidence base does not delay or prevent actions to protect, manage and restore blue carbon habitats both within and without the current MPA network.** Ensuring that Wales is taking every opportunity to effectively use its marine area to tackle the climate change threat.

Above all, we urge that these policies are implemented at pace and with continued stakeholder engagement. We hope you find these recommendations helpful and are able to use them to evaluate and question the Welsh Government's marine policies and priorities for the current session of the Senedd. For further detail, please contact:

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Sean Clement - Policy and Advocacy Manager, Wales (leading on Fisheries, Aquaculture and Pollution) sean.clement@mcsuk.org

Gareth Cunningham - Acting Head of Conservation Wales - gareth.cunningham@mscuk.org

Agenda Item 5.10

Mick Antoniw AS/MS

Y Cwnsler Cyffredinol a Gweinidog y Cyfansoddiad
Counsel General and Minister for the Constitution



Llywodraeth Cymru
Welsh Government

Huw Irranca-Davies MS
Chair
Legislation, Justice and Constitution Committee
Senedd Cymru

13 May 2022

Dear Huw,

Thank you for your letter of 12 May. As you are aware, on 10 May 2022 His Royal Highness the Prince of Wales formally opened the new session of the UK Parliament on behalf of Her Majesty the Queen, and in doing so outlining the UK Government's proposed legislation for the new session.

I have today published a written statement regarding the anticipated implications of the proposed legislative programme for the Senedd, as well as to provide updates on our engagement with the UK Government.

I am keen to ensure we continue to work collaboratively with the Senedd on legislative consent matters, and I hope you will welcome this early letter and the associated Written Statement in that spirit. I can confirm I will attend the Legislation, Justice and Constitution Committee on 20 June. I hope to have more information on the bills referred to in the Written Statement by then and I look forward to discussing further at that meeting.

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Rydym yn croesawu derbyn gohebiaeth yn Gymraeg. Byddwn yn ateb gohebiaeth a dderbynnir yn Gymraeg yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi.

I am copying this letter to the Llywydd and other Committee Chairs.

A handwritten signature in blue ink that reads "Mick Antoniw". The signature is written in a cursive style with a horizontal line underneath the name.

Mick Antoniw AS/MS

Y Cwnsler Cyffredinol a Gweinidog y Cyfansoddiad
Counsel General and Minister for the Constitution

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