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Pwyllgor yr Economi, Seilwaith a Sgiliau
Ddatgarboneiddio trafnidiaeth
EIS(5)DT22
Ymateb gan Bus Users UK

National Assembly for Wales
Economy, Infrastructure and Skills Committee
Decarbonisation of Transport

Evidence from Bus Users UK

About you
Bus Users UK

Your opinion

1. Are the transport emissions reductions targets, policies and proposals (set out in Prosperity for All: A Low Carbon Wales) achievable and sufficiently ambitious?

No

1.1 Please outline your reasons for your answer to question 1

The ambition for a zero emission bus, taxi and private hire vehicle fleet by 2028 is certainly ambitious compared to the UK Government in June 2019 announcing a legal target for zero net carbon emissions by 2050. Whether it is achievable based on current efforts is doubtful.

When the Public Service Vehicles Accessible regulations were introduced in 2000, operators successfully argued that the economic life of a bus was 15 years and operators should be able to use the vehicle for its economic life. The regulations were amended to reflect this with new vehicles falling under the regulations immediately. Exemptions included step entrance vehicles purchased before 2000 which were allowed to operate until 1st January 2016 for single deck vehicles and 1st January 2017 for double deck vehicles. We would expect that operators will seek similar exemptions for existing vehicles, or compensation from Welsh Government if vehicles become obsolete in 2028 when they still have a number of years of economic life.

Private cars account for 55% of transport and 7.7% of total Welsh emissions whereas heavy trucks and buses only account for 2%. More impact would be achieved if activity was focused on switching car users to Ultra Low Emission Vehicles (ULEVs). At the end of quarter 4 of 2018, there were 3,460 electric cars registered in Wales representing 0.23% of the 1.56M cars in Wales. There is clearly a long way to go.

While there are plans to improve public transport to encourage modal shift from cars, Welsh Government needs to adopt more stringent measures to force change. The car is considered king and those who use older diesel cars in particular need to be encouraged to take advantage of scrappage deals and incentives to replace high polluting vehicles with low emission vehicles.

It is anticipated that price parity with ULEV's will be achieved in the mid 2020's which should see an increase in the take up of ULEVs, but whether this will be at a sufficient rate to achieve targets is a matter of conjecture.

We welcome a commitment in the document to show leadership by increasing the use of zero and ultra-low emission vehicles in public fleets. However, a BBC freedom of information request in 2018 revealed that all 72 vehicles owned by the Welsh Government in 2018, including 12 ministerial cars, were diesel powered which should be changed if effective leadership is to be shown.

The admirable objective of a zero emission fleet being achieved by 2028 is extremely unlikely unless significant Welsh Government funding is provided to meet extra costs this would require

2. Is the Welsh Government's vision for the decarbonisation of transport sufficiently innovative, particularly in terms of advocating new technologies?

Don't have a view

2.1 Please outline your reasons for your answer to question 2

There appears to be little detail in the document regarding this.
Some issues to consider are:

Longevity of batteries: can a ULEV cover all routes? Wales is a nation of mountains and valleys and there are concerns that some invariably rural routes would prove challenging terrain for a ULEV bus service with the risk that the community could lose the service if it proved impossible or uneconomic to serve. ULEV technology does not appear to be fully developed and there are also concerns about longevity of batteries and their ability to operate the required mileage of long distance routes.

This raises the issue of charging infrastructure for ULEV buses. While good options exist that could enable such vehicles to recharge swiftly en route, these are expensive to install.

We will need to consider the impacts that Autonomous vehicles will have once the relevant technology is fine tuned.
How sustainable is Electric/Hydrogen power? Will the power supplies be available in the quantity required?

3. What action is required, and by whom, to achieve the targets, policies and objectives?

Infrastructure needs to be in place for more general users of electric vehicles. Significant funding is required to develop this to provide potential users of ULEV with confidence that they will not run out of energy. While the

£2m of funding to assist development of EV charging points in rural areas is welcome, it doesn't appear to match the ambition. The budget for this element needs to be increased.

There will need to be close cooperation with the Bus industry to ensure the success of this initiative. It is estimated that the economic life of a bus is 15 years, so operators which have purchased new buses in the last few years will expect to be operating them in 2028 and beyond. Similarly we are not aware of any local authority bus service tenders that specify that ULEV vehicles are required to operate such services.
The car is currently king and unless tough political decisions are made to introduce congestion charging and chargeable workplace parking then little will change

An active travel strategy that promotes walking, cycling and public transport as alternatives to making short car journeys to the shops or school needs to be in place and well-disseminated in order to improve well-being and reduce obesity.

There will need to be work carried out with the National Grid to ensure that they can supply the power required to support EV charging in Wales. Planning laws need to be strengthened so that any new building development needs to ensure that the project can both be accessed via public transport and will leave a legacy provision of public transport Congestion and Behavioral change….The EIS Committee report of 2017 "Taming the traffic – the impact of congestion on bus services" made a number of recommendations, in particular;

"Conclusion 8. If Wales is to achieve a modal shift in transport behavior, the Welsh Government will need to redress the imbalance between car and public transport. Politicians, at local and national level, will need to be bold and resolute in supporting measures to reduce the impacts of congestion on the bus industry."

We have seen very little evidence of this being addressed. The time for action is now if the decarbonisation of public transport is to be achieved.

4. **How should the new Wales Transport Strategy reflect the actions needed to decarbonise transport?**

Behavioural change measures need to be proactive to have any impact. Some people are wedded to their cars and many will continue to use cars to make journeys that can easily be made by public transport unless they are forced to change. We have seen from the ban on smoking and the plastic bag levy that proactive legislative measures have influenced behavioural change and achieved significant results. Examples of where behavioural change can be driven are;

Congestion charging, a demonstrably effective tool in encouraging behavioural change. In March 2019, however, Cardiff Council dropped plans to look at this, as the council reached the conclusion that its clean air zone would disproportionately hit owners of older cars and would only spread the polluted air to other parts of the city. This approach could be revisited. Workplace parking levies on employers who provide workplace parking. Nottingham City Council successfully introduced such a scheme to tackle congestion and provide funding for improvements to public transport. This could be adapted for use in Wales.

We need to travel less to reduce our carbon footprint, with employers allowing their staff to work from home where appropriate. In the same way that the building of new roads brings an increase in the volume of traffic, there is a conflict between developing better transport links and the need to reduce the demand for travel.

There is an aim to increase travel by rail but it needs to be understood that the bus feeds a lot of journeys by rail. There is a need for significant investment to make bus/rail a viable alternative to the car.

Euro VI engine technology is clean with current diesel buses demonstrating very low pollutant emissions. There has been a 90% reduction in NOx from Euro V to Euro VI. A Euro VI bus gives out less NOx than a Euro VI car. Modern diesel buses, including retrofit of existing vehicles to Euro VI standard, will deliver the reduction in NOx and other harmful emissions that is required in the time frame available. Retrofits for buses are reliable and proven to deliver Euro VI emission performance. According to Professor David Begg, “If retrofitting diesel buses to Euro VI standards is not supported the impact on bus passengers will be severe.

It would be extremely harmful to the bus sector in what would be a perfect storm of declining patronage as a result of online shopping and relatively low motoring costs, coupled with the relentless increase in congestion which is pushing up bus costs and on its own is reducing patronage by 10% every decade. The more likely scenario is a combination of fare increases and service cuts.”

There is a need to ensure that the costs of converting buses to ULEV is not borne by passengers. Buses must be an integral part of the solution and NOT seen as part of the problem. The Wales Transport Strategy must recognise the importance of, and provide sufficient funding for bus as the form of transport used by many more passengers than rail

5. **Do you have any other points you wish to raise within the scope of this inquiry?**

According to Professor David Begg’s report Improving Air Quality in towns and cities (2017);

“Progress in clean diesel bus technology has dramatically exceeded diesel car technology. Real world testing of Euro VI diesel buses demonstrates a 95% reduction in NOx emissions compared with Euro V. Currently a journey by a Euro VI diesel car emits 10 times the per passenger NOx of a comparable journey by a Euro VI diesel bus.

“Measures to encourage modal switch from car to bus can be trans formative. Bus priority measures can deliver 75% fewer emissions per bus passenger km than for car passengers. A fully loaded double decker bus can take up to 75 cars off the road. Putting buses at the centre of air quality strategy would support UK manufacturing. At least 80% of urban buses sold in the UK are built in the UK. Financial support for bus retrofitting provides more than 15 times as much value as scrappage allowances for diesel cars to convert to Euro 6 or electric, and 11 times as much value from a bus scrappage scheme compared with diesel car scrappage. Modern Euro VI diesel buses and retrofits can deliver the seismic reduction in NOx required” It is vital that Buses are seen as an integral part of the solution, not part of the problem. If decision makers put buses at the centre of strategies to tackle air quality and congestion we will achieve a virtuous circle of falling costs, higher frequencies, lower fares and higher patronage. This will lead to improvements in local transport which will connect people and communities better, enable more people to access work, education and training and result in fewer people suffering from social isolation, loneliness and rural deprivation. Tough political decisions at national and local level are required. This means much tougher action on private diesel cars, ensuring only the cleanest and most efficient vehicles are in use and encouraging greater use of public transport and other measures to tackle congestion.

Passengers want an easy-to-understand network with a simplified fares and ticketing structure; better service frequencies during the daytime with services operating 7 days a week from early morning to late evening to accommodate changing work and lifestyle patterns; bus stops and shelters with clear information; and raised kerbs to facilitate access to buses. They welcome their services being provided by ULEV, but not if that means that the additional cost of providing such vehicles is passed on to them in the form of higher fares.