

Green Alliance

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?

Partly

1.1 Please outline your reasons for your answer to question 1

Overall targets: The 2020 and 2030 targets of 14% and 43% cut of emissions below 1990 levels are sufficiently ambitious, and in line with the Committee on Climate Change's pathways. i ii Given the recent decision for the UK to reach net zero emissions by 2050, and for Wales to reduce emissions 95% by the same date, there is scope for faster ambition within this area, but as it is uncertain what more ambitious fourth and fifth UK carbon budgets would look like and what this would mean for Wales than is currently sufficient. iii However, longer term, the 2040 and 2050 target of 65% and 79% cut of emissions below 1990 levels is not in line with this ambition. Surface transport is an area with potential for faster and deeper reductions in emissions than other sectors, particularly the industrial sector, a disproportional component of Welsh emissions.

This also implies a slowing speed of reducing transport emissions past 2030, after more technologies become available, which is a perverse outcome. Wales should aim to cap emissions from international aviation and shipping at present levels to 2050 and aim to almost completely decarbonise all other transport emissions by the same date to hit the 2050 target, resulting in a more ambitious cut in transport emissions of well over 90% by 2050. The widespread adoption of EVs and zero emission HGV technologies should be more prevalent in the 2020s and past 2030, in order to assist this. Along with the Committee on Climate Change's work, this ties into the similar UK-wide recommendations from the National Infrastructure Commission, advocating 100% EV sales by 2030 and £43bn additional investment in urban transport across the UK by 2040. iv

1.2 EV sales: The headline ambition for all taxis and private hire vehicles to be zero emission is welcome, but risks obscuring numbers. This would represent a switch to approximately 10,000 electric vehicles, 0.75% of the current 1.5mn car fleet of Wales. Equally, the target of all new vehicles in the public fleet being EVs by 2025 is a small proportion of total vehicles, and is behind our target of 2022 for UK government. The target of 60% of all new vehicles being EVs by 2030 is unambitious, as it represents the average of the UK's Road to Zero target of 50-70% of sales being EVs by the same year. v This policy in itself is deeply unambitious, as our work and the Committee

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on Climate Change has strongly advocated as a net zero priority that EV sales should be 100% of vehicles in 2030. vi Within that, we also advocate for over 75% of vehicles sold being battery electric or zero emission vehicles by this date, not plug in hybrids. This also makes the ambition for only 25% of vehicles sold in Wales to be BEVs by 2030 highly insufficient. The plan does mention fleet vehicles switching over to EVs but targets and aims within this, or some greater idea of scope, is needed to get a fuller idea of future policy.

1.3 EV infrastructure: The £2mn target for a Welsh rapid charging network is highly appreciated. With approximately 30-40 rapid chargers in Wales currently, Wales is one of the worst served areas of the UK for rapid charging by geographic distance. vii Further clarity is needed on how many rapid chargers this would lead to and where they would be located. The Energy Saving Trust estimate rapid chargers will cost £20-40,000 (not including installation cost or network upgrades), so this will likely lead to 50-100 additional rapid chargers, doubling to quadrupling the current number of rapid chargers. viii The Welsh government should follow the lessons learnt from the Scottish government's Switch On Scotland programme in its rapid charger rollout, and build chargers alongside main road routes across the country, not just in major centres of population. ix The current EV charging infrastructure is too concentrated in South-East Wales and particularly Cardiff. The Welsh government is correct to prioritise rapid charging in its funding, but also must ensure that it supports the rollout of fast chargers in addition (slow chargers are not a priority).

1.4 Buses: The action for buses is generally positive. Public transport has a proportionally greater role to play in reducing emissions in Wales than in the UK as a whole. The 2028 goal for zero emission buses is considerably more ambitious than the same goal for taxi and private hire vehicles, with the 2,150 buses in the fleet to be converted to zero emission alternatives sending a stronger indication for electric buses than any UK policy. x Given the currently high capital costs for zero emission bus models, xi we would be interested in seeing the estimates for these and how the Welsh government will fund this. In terms of additional bus services however, this plan provides little detail. New bus routes would be a fast way of cutting emissions in the short term, and would be cost effective. Many areas of Wales are not serviced well by rail, and it will take time to establish an effective rail network. Utilising long haul bus routes in these areas can connect areas via public transport that would otherwise have been forced to use private transport.

1.5 Rail: Likewise, the rail policies outlined in the plan make many welcome references to increasing numbers of services, but there is still a capacity gap in South West Wales. There is clear ambition to go beyond the South Wales Metro and Wales and Border Service. A target for electrification of trains would ensure reducing emissions from existing trains, and reviewing where brand new lines could go would incentivise greater connectivity of the country.

1.6 HGVs: We welcome the target for all HGVs in the public sector by zero emission by 2030. More clarity on what kind of technology is likely to cover these vehicles could be extremely useful, as the UK wide debate on zero emission HGVs covers battery electric, hydrogen and direct electric alternatives. Wales should explore the scope for nationwide deployment of zero emission trucks and long haul coaches where possible, or take a view to bring these alternatives into the transport mix longer term. As there is a lack of strategy on HGVs in the UK as a whole, ambitious deployment by Wales could influence the national debate and give Wales a competitive lead over other regions, bringing economic opportunities with the new technology.

1.7 Aviation and shipping: There are few policy measures in this plans to prevent emissions from aviation and shipping, but we recognise that these powers may be outside the control of the Welsh government.

1.8 Walking and cycling: Devolving powers to local authorities and monitoring progress is the correct level of ambition

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

Partly

2.1 Please outline your reasons for your answer to question 2

Most of the successful measures above are relying on existing technologies. EVs, rapid charging and modern rail transport are already established in Wales, and this programme scales these technologies up. The exception is the target for zero emissions buses, which are a much more niche market in the UK and the Welsh target will require investing in fairly new technologies. The policy doesn't explicitly include innovation in new types of zero emission buses, but should allow ample scope for innovation, for example in new forms of battery technologies. The Welsh government therefore has an opportunity to innovate on new types of new zero emission technology, and should consider taking advantage of this. There is also no mention of the type of technologies used to reduce emissions from Heavy Ground Vehicles (HGVs) such as trucks and coaches, and Wales should decide which route it is likely to centre its efforts on. There is opportunity here for research and development of zero emission alternatives. Equally, while this is further outside the Welsh's government's control, a fuller exploration of what is possible to achieve in reducing emissions from aviation and shipping within Wales is required longer term

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

3.1 Overall targets: The Welsh government should keep its interim targets for 2020 and 2030. It should however, review and bring forward its targets

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for 2040 and 2050, particularly with reference to the 95% emissions reduction target recommended by the Committee on Climate Change.

3.2 EV sales: The Welsh government should implement a target for 100% sales of vehicles being ultra-low emission by 2030, with a clear majority not coming from plug-in hybrid vehicles. This will give dealers and the automotive industry much clearer and shorter term direction on the future of road transport in Wales.

3.3 EV infrastructure: The £2mn rapid charging network is currently sufficient – longer term as EVs numbers rise, additional rounds of rapid chargers will be required to facilitate greater numbers of EVs. For additional rapid chargers, but more critically fast chargers, the Welsh government should work closely with the private sector to cater to their needs, and regularly consult on the best way forward.

3.4 Buses: Investment in low carbon buses is very welcome. Given the relative ambition of this policy, an innovation angle should be introduced for the new bus fleet, allowing for new forms of battery energy storage and potentially even hydrogen buses. Expanding greater number of bus services is welcome, but connecting sparsely populated areas also needs to be considered further where there currently exist few public transport options. Further financial or policy incentives for bus companies to do so could be an avenue to achieve this.

3.5 Rail: Existing schemes should aim to be delivered successfully, with a view for future metro schemes in densely populated areas. There should also be a future rail network to connect more isolated areas, particularly in the South West.

3.6 HGVs: We welcome the commitment to all public sector HGVs being zero emission by 2030. A decision on which technologies will be used to decarbonise these vehicles will be helpful for the UK wide debate, and will allow testing of specific technologies. Targets need to be set for HGV decarbonisation Wales-wide once this decision has been made.

3.7 Aviation and shipping: A review of what is in the Welsh government's power to do on reducing emissions from these sources should be published.

3.8 Walking and cycling: Continuing implementation of these policies will be continued by local authorities. It is the role of the Welsh government to monitor and advice these authorities on what approaches will be needed

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

4.1 Decarbonisation of transport should be a priority in the new strategy. It should integrate the areas of the Prosperity for all: A low carbon Wales that show sufficient ambition, breaking down more granular details on cost and

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implementation. It should also address areas highlighted above where ambition is not sufficient, in particular EV uptake. Wales can particularly benefit from UK industrial strategy funding, such as the £650mn in city and growth deals.

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

- i Welsh Government, 2019, Prosperity for All: A Low Carbon Wales
- ii Committee on Climate Change, 2018, Reducing UK emissions: Progress report to parliament
- iii Committee on Climate Change, 2019, Net zero: The UK's contribution to stopping global warming
- iv National Infrastructure Commission, 2018, National Infrastructure Assessment
- v Department for Transport, 2018, Road to Zero: Next steps towards cleaner road transport and delivering our Industrial Strategy
- vi Green Alliance, 2018, How the UK can lead the electric vehicle revolution
- vii Zap Map, 2019, <https://www.zap-map.com/>
- viii Energy Saving Trust, 2017, Guide to chargepoint infrastructure for business users
- ix Transport Scotland, 2017, Switched on Scotland Phase Two: An Action Plan for Growth
- x The TAS Partnership Limited, 2015, Transforming Bus Investment in Wales: The Welsh Bus Fleet - A Report to the Welsh Government's Bus Policy Advisory Group20102C
- xi Low Carbon Vehicle Partnership, 2019, The Low Emission Bus Guide