

# WLGA CONSULTATION RESPONSE on Decarbonisation of Transport



CLILC • WLGA

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## INTRODUCTION

1. The Welsh Local Government Association (WLGA) represents the 22 local authorities in Wales, and the three national park authorities and three fire and rescue authorities are associate members.
2. The WLGA is a politically led cross-party organisation, with the leaders from all local authorities determining policy through the Executive Board and the wider WLGA Council. The WLGA also appoints senior members as Spokespersons and Deputy Spokespersons to provide a national lead on policy matters on behalf of local government.
3. The WLGA works closely with and is often advised by professional advisors and professional associations from local government, however, the WLGA is the representative body for local government and provides the collective, political voice of local government in Wales.
4. Transportation of goods and people around Wales is fundamental to our current economic model and our well-being as a nation. It is an integral part of most economic, social, environmental and cultural activity. With transport accounting for 14% of Wales' carbon emissions, it is essential that the sector is made more resilient, efficient and low carbon in a cost-effective way if we are to meet the Welsh Government's requirement to reduce overall carbon emissions by at least 80% (or higher) by 2050.
5. However, according to Department of Transport statistics, since 2010 the volume of traffic on roads in Great Britain has increased by 8%. *Department of Transport - The Road Safety Statement 2019 A Lifetime of Road Safety*. As is recognised by Welsh Government, the most effective way of reducing CO2 emissions in the near-term will be to replace car journeys with those using the existing public transport system and active travel. Therefore, as a nation we are still moving in the wrong direction, even allowing for the increased efficiency of vehicles and the rise of hybrid and EV.

6. This trend is also reflected in the data in the Prosperity for all; a low carbon future document where movement on many of the required trajectories is not fast enough.
7. Therefore, some further radical thinking is required as to how demand will be managed to ensure well-being and to tackle the climate emergency. Issues such as helping support and grow sustainable forms of transport as part of the foundational economy as well as improving the accessibility of local services may be critical to this debate.
8. Significant investment in areas such as active travel and the development of the place making agenda with Planning Policy Wales have been vital in signalling a change in direction across transport policy. Some of these changes will take time to have effect.
9. The diversity of Wales also makes this agenda particularly difficult especially in terms of giving people real alternatives to car use in particular. Therefore, crafting a range of policies to meet these wide-ranging issues will always be challenging. The work that some LA's are doing with WG and TFW on Integrated Responsive Transport (IRT) is a good example of the innovation that will be required.
10. The general response from Local Authorities to the *Prosperity for All: A Low Carbon Wales* plan is that this is a good start which captures a range of interventions that potentially begin to tackle the problems. The expectation is that the *Wales Transport Strategy* will flesh out these policies and provide the detail required. In turn this will set the context for the local transport strategies which will set out the detailed delivery.
11. It is also recognised that initiatives such as rail investment programme, and regional transport actions under the City Deal/growth areas are progressing at a pace. The significant investment in rail travel (policy 47) is likely to have a large impact. However, it is difficult to determine from the information in this document what the scale of that impact will be and this remains an issue with most of the policies at this stage. What is the cost-benefit of this investment as opposed to other areas of transport policy?
12. Broadly, Local Authorities have welcomed the approach to transport set out in the document. The key questions remain as to the deliverability of some of the targets and the process to achieve them. The document quite rightly sets out some key aspirations but does so in broad language that makes assessing the deliverability of the targets difficult. The expectation is that the *Wales Transport Strategy* will deliver the specific detail on how these aspirations will be delivered.
13. It is also important to note that the declaration of the climate emergency in Wales happened after the publication of this document. A number of local authorities have followed suit in declaring an emergency. The climate science has been well articulated in the past at the Climate Change Commission so the range of impacts on Wales is understood. What is critical is the wider public

discourse and engagement on this issue so that public agencies have a greater mandate to take the range of radical action now needed to make a difference. There can be no doubt that difficult and controversial decisions will need to be taken as evidenced by the M4 relief road debate.

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

14. The document makes sobering reading about the progress Wales is making towards its climate change targets. Clearly there needs to be a step change to get back on track with some of the necessary trajectories. It is *not yet* clear from this document whether the range of actions alone will deliver that step change. Transport serves a purpose and is not an end in itself and what really needs greater thought is how to reduce the demand for movement and enable the societal change that is required. Whilst encouraging broadband is one aspect of this it does not solve the issue and sometimes outcomes such as homeworking and home shopping may exacerbate them.
15. The list of transport actions are wide ranging and challenging. However, most are expressed in aspirational language with little detail on how they will be delivered and, in some cases, how they could be delivered. As stated, it is expected that far more evidenced detail will be presented in the Wales Transport Strategy on the scale of impact that is expected and how it will deliver the necessary carbon reduction. There also needs to be greater clarity about the expectations on all sectors to deliver this and an understanding of the potential opportunity costs.
16. There is a clear need for collaborative working and a strategic approach to decarbonisation, however the individual economic and geographic differences between Local Authorities must be considered, ensuring a 'one size fits all' approach is not proposed.
17. Rural authorities have queried how the policy aimed at zero emissions for bus and private hire vehicles could be met within the timescale. As work in North and Mid Wales is illustrating, the infrastructure goes beyond the charging points and onto the national grid. The issue here is also that a range of technologies for different uses will need to be promoted; hydrogen for example is often talked about in terms of heavy goods vehicles. Again, this needs government investment in infrastructure and support for struggling bus companies to make this a reality. Also, using gases from AD facilities has been suggested as an option. This illustrates the issue where there are a number of potential options, but detailed work required on the practicality, when and where to use, infrastructure (e.g. grid, depots, mechanics/skills) and investment to make it a reality.
18. Expertise, knowledge and guidance will also be critical. Twenty-two local authorities do not currently have this, and collective action will be important.

19. Another comment has been that the approach to achieving low carbon outcomes should do more to get communities to take responsibility for their emissions. This mirrors debates across many service areas where consultation and engagement are moving into involvement, in line with the Well-being Act. Clearly this would need to be handled carefully but a more informed local debate on these issues is needed, alongside co-production of solutions. Public Service Boards will have a role learning from the work in Cardiff and the Vale considering how as major employers can drive this debate. A number of LA's have progressed the digital delivery of aspects of services but perhaps we need a more radical debate about community-based delivery.
20. The role of the recently published National Development Framework should be helpful on aspects of this, setting out strategic development priorities in a spatial way. Therefore, the part played by land-use planning and the location of public services is important. The current patterns of employment growth are concentrated on very small footprints which leads to tidal movement of employees, stressing our transport networks. Trains are often overcrowded (in one direction only), buses are trapped in congestion and private car becomes the default choice for the vast majority.
21. For example, in Cardiff it is often cited that 100,000 commuters cross their boundary every morning, 80,000 by car.
22. Whilst in this case the Metro will offer a major expansion of rail along the A470 corridor circa 2022, even doubling rail use may only equate to a few years' car growth – continuing to follow this approach is not sustainable into the medium term without massive expansion and investment in new public transport corridors.
23. More effective land-use planning offers a way forward and collectively government control the levers on public sector (re-)location; locating TfW in Pontypridd is a prime example of the change in strategy that is needed. Other regional towns have the potential for a similar approach, creating shorter journeys and 2-way flows on rail, and reducing the journey times on bus, making bus a viable option for commuters.
24. Being realistic, the main growth will still be in the cities and require investment in mass transit from the wider region but we can balance some of this by being smarter with public sector investment – this will act as a catalyst for elements of the private sector to co-locate.

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

25. Welsh Government should continue to strive to provide the necessary economic and business support to allow innovative technologies to develop in Wales. Whilst the public sector may have a role in encouraging new technologies through procurement and infrastructure the scale of the

investment and potential market failure means that it is not prudent to invest significant public money in emerging technology too early. The reality is that LA's are having to reduce current services such as bus subsidy therefore it is difficult to see how this can be achieved. The joint initiatives with TfW to look at demand responsive bus services are attempting to do this by shifting resources rather than additional budgets. This is a model that will need to be used elsewhere.

26. Therefore, technologies in this case are focused on information and communication rather than hard infrastructure.
27. As the document makes clear, the short-term priority is to achieve modal shift to public transport and active travel to achieve the targets. This also has wider potential benefits around physical and mental well-being, connectivity of communities and air quality. Therefore, a careful cost benefit needs to be undertaken to determine if limited resources are better invested in the short term in promoting and delivering modal shift rather than significant investment in hard infrastructure technology which may prove redundant or actually exacerbate the issues. There is a risk that the glamour and excitement of new technology leads to national and local investments in the wrong areas, leading to smaller reductions in CO2 emissions. At all levels, the emphasis should be the best return on investment. If LA's are given a clear signal that the current upsurge in Active Travel funding is a long-term programme of investment, then they can continue to grow the expertise necessary. If LA's have five-year indicative capital funding allocations, they can programme the works far more efficiently than a situation where often a few months into the year in which they have to spend the budget they get confirmation after a resource intensive bidding process.
28. The use of autonomous vehicles has been raised by some LA's as a good example of where Welsh Government action is required with the UK government to ensure that full advantage is taken. Technology has also been cited as a means of reducing the need to travel, remote outpatient clinics using other public sector buildings based in communities quoted as an example. Again, the Public Service Boards need to drive this type of agenda.
29. It is also essential to get a clear national strategy specifying outcomes (not solutions) at the outset. The roll out of EV charging is a good example. If each local area does its own thing there is a risk of inconsistency and/or drivers having to belong to multiple networks when travelling across Wales. Clear national expectations can give a steer to the private sector who have the resources necessary to make change at scale.
30. The emphasis on EV also must consider the potential for 'leapfrogging' existing technology. Significant research and investment in to hydrogen and other alternative fuels, means there is potential for electric vehicles to become redundant over the medium-term. This is particularly poignant in Wales, where topography and dispersed communities make investing in the electrical infrastructure required for charging EVs more costly and challenging than other parts of the UK. A careful cost-benefit analysis should be done to

consider this, and it again emphasises the need for a carefully considered strategy for EV charging.

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

31. Each action requires detail on delivery mechanisms, roles and responsibilities and an assessment of the cost benefit expected for the level of investment required. This should be co-produced between WG, LG and partners, with delivery roles for the new regional structures integrated into this thinking.
32. The Welsh Government Budget should then reflect this in terms of the investment priorities that it sets out across all budget areas. For example, investment in large and efficient medical centres of excellence may improve health outcomes for those patients, but require many more journeys, the stress of remote treatment away from community support, greater travel from staff, balanced against more energy efficient buildings etc... The same is true for investment in education. More needs to be done in understanding the wider impacts of such programmes in light of the Well Being Act.
33. It is important to know the cost implications of these actions for local government at a time when the budget/settlement is being developed and not simply assume the resources can be found. The decline in bus use and LA subsidy for services is a case in point. The resources are simply not there anymore to continue to deliver services in this way. The transport white paper sets out some interesting ideas on approaches such as franchising but without the resources to deliver this it is problematic. The pilot work on Integrated Responsive Transport systems across 3 LA areas may point to a more demand responsive public transport system that is more flexible and able to meet changing needs. This co-production of solutions between Welsh Government, communities and Local Government is the only sensible way forward given the huge restrictions on resources and the ever-increasing policy demands on local government.
34. The private sector will undoubtedly play an important role in achieving the targets, particularly when considering the investment in technology and infrastructure required. This relationship must be carefully managed however, and WG and Local Authorities need to ensure they are maximising the return on their investment. One example of this is in the proposed investment in EV charging infrastructure, where Local Authorities have the potential to receive an income from contracts with private companies, or directly by charging users. The imperative to derive income should not lead to solutions which do not provide the most benefit. Again, the opportunity to utilise economies of scale should be considered, and collaborative working between Local Authorities, partners and Welsh Government will be important in this regard. Engagement with universities and research will also be crucial, not only through the advancement of technology, but also through research in to behaviour change.

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

35. The WTS must make a very clear statement that the climate change emergency and carbon reduction are fundamental considerations that have shaped the strategy and will inform all activity that results. The strategy is developed in light of the WFG Act and the Environment Act decarbonisation goals/SMNR.
36. Each action requires detail on delivery mechanisms, roles and responsibilities and an assessment of the cost benefit expected for the level of investment required. This should be set out in the Transport Strategy but also needs to be reflected across a range of portfolio areas. Every policy area should be required to demonstrate how budget decisions have reflected the need to minimise travel and movement, other than through active travel. No investments should be undertaken which have a negative net carbon whole system impact on Wales unless it can be shown to have benefit across the range of Well Being goals. Assembly Members should be given  
  
the necessary information to review the spending plans of Ministers as part of the budget setting process and to monitor progress over time. This information should be  
provided in the context of ensuring that spending is focused on the areas that will deliver the largest carbon reductions based on available evidence.
37. Any aspect of policy that requires movement of people or goods should consider the transport and carbon implications of any policy change and seek to maximise the reduction.
38. More thought is needed to determine how Community Involvement, via local government and others, can help co-produce the range of solutions needed in different circumstances across Wales. Regional Transport Authorities should be given a remit to drive this, alongside the likely roll out of 20mph defaults, greater investment and use of active travel and initiatives such as pavement parking bans. More fundamentally, how we plan, develop and grow as a nation must give our citizens the real option of low carbon movement rather than having to rely on the current unsustainable patterns of travel. It is clear that a change in travel behaviour is required in order to meet Wales' ambitious decarbonisation commitments, and that simply reducing the carbon footprint of existing methods of transport will not honour these.