

sustainable development commission

SDC Submission to

**Wales Transport Strategy
a Consultation**

February 2007

1 The Sustainable Development Commission

- 1.1 The SDC is the Government's independent watchdog on sustainable development and reports to the Prime Minister and the First Ministers of Scotland and Wales. Transport is a sector which impacts on many sustainable development issues including climate change, social inclusion, and health. We therefore welcome this opportunity to respond to Wales Transport Strategy – a consultation.

2 Introduction

- 2.1 The SDC saw many positive elements to the strategy including:

- Maintenance of the free travel system for over 60s and disabled people
- Consideration of how concessionary travel can be extended
- The review of freight grants to help encourage the shift of freight from road to rail and coastal shipping
- Support for new long distance bus services
- The re-opening of the Vale of Glamorgan rail line

However, we also have concerns. The overarching one is the limited reference to the UK's shared framework for sustainable development, and the goals of Living within Environmental Limits and Ensuring a Strong, Healthy and Just Society. For reference, we provide the framework and the goals at the end of this document.

This meant that the strategy, while showing a good understanding of the environmental, social and economic aspects of sustainable development and transport, and how these could be addressed, failed to set these within an appropriate framework. For example economic benefits and environmental impacts were seen in isolation. Furthermore, limited consideration was given to the sustainable development principles of good governance and using sound science responsibly. As a result, it is not clear whether the strategy will result in a sustainable transport system for Wales.

In the remainder of this note we consider three key issues. The first is whether the strategy contributes to Living within Environmental Limits, notably its contribution to climate change reduction. This illustrates our concerns over the need to consider economic benefits and environmental impacts within a wider sustainable development framework. The second is biofuels and the need for all sustainable development impacts, not just carbon reduction to be taken account in policy decisions. Finally, we briefly consider road pricing and the need for any scheme to reduce emissions.

3 Living within Environmental Limits

- 3.1 The SDC is pleased that a key strategy outcome will be the reduction of greenhouse gas emissions from the transport sector. However, we seek reassurance that this reduction includes emissions from aviation (domestic and international) as well as land based transport.

Within this context we also have concerns about the impacts of the M4 and the introduction of the intra-Wales air link on the potential achievement of this outcome and set these out below.

Increased capacity on the M4 in South Wales

The SDC is concerned that the increased capacity on the M4 will result in 1) increased traffic and greenhouse gas emissions, and this concern is echoed in the Strategic Environmental Assessment¹ and 2) increased, unsustainable, particularly in transport access terms, development at junctions.

Intra-Wales air link

3.2 The SDC, take this opportunity to, again, express our concern over the introduction of the Cardiff – Anglesey air link. There are two main reasons:

1) The potential for induced traffic

While the Cardiff – Anglesey air link is intended to be a small scale operation (less than 20,000 journeys annually and two return flights a day) and the SDC is concerned that the new air service would, as a result of time savings offered, stimulate new travel demand and patterns, and result in greater carbon and other climate change impacts than perhaps initially anticipated.

2) The policy disjunct

The SDC also suggests that there is a potential disjunct between a new air route opening at a time when large scale emission reductions from current levels, to avoid the worst effects of climate change, are necessary.

We also note the recommendations set out in the Strategic Environmental Assessment :

“The WTS should require that increased air services are considered only where evidence can be provided that more sustainable solutions are not available, and where net increases in GHG emissions can be off-set by a reduction in GHG emissions from other areas of the transport sector or from other sectors in Wales”

have not been met.

4 Biofuels

4.1 The strategy also highlights that the use of biofuels to address greenhouse gas emissions provides an important means of reducing greenhouse gas emissions, and suggests that they will make a minimal contribution to carbon emissions. However, the SDC² analysis suggests a wide range of potential carbon reductions from biofuels and a number of sustainable development implications.

4.2 We, therefore, ask the Welsh Assembly Government to consider biofuels in a sustainable development context. The SDC supports the need to increase the proportion of biofuels in the UK fuel mix in line with the current proposals for the Renewable Transport Fuels Obligation

¹ The SEA highlights that “the building of new roads to tackle specific significant issues is likely to result in major adverse effects on climatic factors as road building can be expected to be accompanied by increases in overall traffic levels, which will lead to increased greenhouse gas emissions”.

² Sustainable Development Commission (2006) Sustainable Development Commission Response to the Department for Transport on Biofuels and the Renewable Transport Fuels Obligation http://www.sd-commission.org.uk/publications/downloads/Biofuels_SDC.pdf

(RTFO), and other mechanisms, provided three main safeguards are in place:

1. The verification procedures, which accompany the mandatory reporting and proposed standards associated with the RTFO, must be rigorous
 2. They must cover complex issues such as the potential for deforestation and societal impacts
 3. The RTFO should be designed with graduated incentives for lower carbon fuels from the outset to provide an incentive for maximum carbon savings. Waste products such as vegetable oils, forest residues and animal wastes could all play an important role.
- 4.3 Without these safeguards there is a risk that the increased use of biofuels for transport could result in limited or even increased emissions of greenhouse gases compared with the use of fossil fuel equivalents as well as unacceptable social and other environmental impacts.

5 Road Pricing

- 5.1 The SDC are pleased that road pricing is seen as having a key part to play in the Assembly Government's future transport policies. And recognise, like the Assembly Government the importance of any particular social group being treated on an equal basis. However, while we understand their emphasis on congestion reduction it is also essential that road pricing also helps reduce emissions. Therefore, we recommend that any road pricing scheme must also consider distance travelled and vehicle efficiencies.

Annex

One future - different paths - The UK's shared framework for sustainable development

The New Framework Goal for Sustainable Development

The goal of sustainable development is to enable all people throughout the world to satisfy their basic needs and enjoy a better quality of life without compromising the quality of life of future generations. For the UK Government and the Devolved Administrations, that goal will be pursued in an integrated way through a sustainable, innovative and productive economy that delivers high levels of employment, and a just society that promotes social inclusion, sustainable communities and personal well-being. This will be done in ways that protect and enhance the physical and natural environment, and use resources and energy as efficiently as possible. Government must promote a clear understanding of, and commitment to, sustainable development so that all people can contribute to the overall goal through their individual decisions. Similar objectives will inform all our international endeavours, with the UK actively promoting multilateral and sustainable solutions to today's most pressing environmental, economic and social problems. There is a clear obligation on more prosperous nations both to put their own house in order and to support other countries in the transition towards a more equitable and sustainable world.

Sustainable Development – Five principles

