



URBAN TRANSPORT GROUP

Consultation Response

Transport Decarbonisation Plan – call for ideas

Department for Transport

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1. Introduction

- 1.1. The Urban Transport Group represents the seven strategic transport bodies which between them serve more than twenty million people in Greater Manchester (Transport for Greater Manchester), Liverpool City Region (Merseytravel), London (Transport for London), South Yorkshire (South Yorkshire Passenger Transport Executive), Tyne and Wear (Nexus) and the West Midlands (Transport for West Midlands). The Urban Transport Group is also a wider professional network with associate members in Strathclyde, Bristol and the West of England, Tees Valley, Nottingham, Northern Ireland and Wales. This response is on behalf of our full members.
- 1.2. We welcome the Department for Transport's (DfT) "Decarbonising transport: setting the challenge" document and the Government's commitment to Net Zero. With transport now the largest source of UK carbon emissions, and with the UK hosting COP 26, the onus is on both national government and urban transport authorities to show leadership and ambition in decarbonising urban transport as soon as is practicable.
- 1.3. To this end we strongly support the focus on accelerating modal shift and for public transport and active travel to become the natural first choice.
- 1.4. The on-going COVID19 pandemic presents both challenges and opportunities. The challenge of a car-led recovery but also the opportunity to build back better from the crisis moving at a pace and scale commensurate with the necessity of a green economic recovery and with the experience of how quickly radical policies were put in place during the pandemic.
- 1.5. If the right policy choices are made now we can transition to a decarbonised urban transport provision which will support the aspirations of our city regions to become happier, healthier, greener, fairer and more prosperous places.

2. The scale of the challenge

- 2.1. The scale of the challenge of decarbonising urban transport is significant. We start from a position whereby:
 - Public transport share of trips made is low - outside of commuting into some of the larger urban centres. Bus use has also been in general year-on-year decline.
 - The COVID19 pandemic saw a dramatic reduction in demand for public transport. This has been followed by a slower return of demand compared with a more rapid resurgence of general road traffic.
 - Cycling levels remain low in general, at about 2% of trips in 2019.
 - The car continues to dominate trip share (61% of trips in 2019) with many urban geographies and local economies (outside of the largest city centres) having been redesigned in a car dependent way in recent decades.
 - Significant investment in all vehicle fleets (and the infrastructure for the supply of decarbonised electricity and other fuel sources) will be required if the urban vehicle fleet is to be decarbonised.



- The fiscal and taxation framework for transport does not always favour or promote low carbon choices.

2.2. Given this backdrop incremental changes in policy are unlikely to be sufficient.

3. The key role of local transport authorities

3.1. Properly empowered local transport authorities have a key role to play in any effective transport decarbonisation plan.

3.2. Local Transport Authorities for the city regions in England outside London are already responsible for:

- Overarching transport policies and investment programmes, including in relation to the decarbonisation of vehicle fleets and on measures that will promote modal shift in ways that reduce carbon emissions.
- Providing different forms of revenue support for public transport in order to support modal shift.

3.3. In London TfL is more fully empowered than transport authorities in England's other city regions - including having responsibility for key roads and for the provision of a fully integrated public transport network.

3.4. Fully empowered transport authorities for city regions are critical to transport decarbonisation because they are able to:

- Organise road space in a way which facilitates and encourages active travel and public transport and discourages more carbon intensive modes.
- Support, promote and invest in public transport so that it provides an effective alternative to car use.
- Invest in the decarbonisation of bus fleets.
- Work with District councils and the power sector to ensure that electricity, hydrogen and biogas is available to power low or zero emission vehicle fleets.
- Coordinate with wider economic and housing plans to ensure that existing and new developments are easily accessible on foot, by bike and by public transport. We explore this in more detail in our report [‘The place to be: How transit oriented development can support good growth in the city regions’](#).
- Coordinate with the wider local public sector – including education, local government, health and social care on the transport implications of their policies and decisions. We have produced a number of resources for the transport and health sectors to support collaborative working which can be found [here](#).
- Promote the transition to decarbonised urban transport through comms, travel demand management programme, outreach and their network of contacts with local businesses, the wider local public sector and community groups.
- Make wider connections between the decarbonisation of transport, energy and the built environment at the local level. For example, through municipal renewable energy generation or through programmes of decarbonising public sector buildings. We explore



this in more detail in our ‘Making the connections on climate’ report, which can be downloaded [here](#).

- Supporting ‘place based solutions by taking a view across conurbations of the different types of policies which will be most effective across the very different local economies and geographies that city regions contain (from the central business districts of core cities through to post-industrial towns, suburbs and edge lands).
- Coordinate decarbonisation policies with those designed to improve air quality.
- Take a view on the trade-offs between measures which reduce carbon and those which will improve the resilience of transport infrastructure to the more extreme weather conditions that are already occurring (such as through blue-green infrastructure to deal with higher temperatures and more intense rainfall).

3.5. In order to more fully empower local transport authorities to drive forward the decarbonisation of urban transport there is a need for:

- Stable long-term capital and revenue funding for transport authorities – along the lines of the long term funding packages that are in place for national rail and road. We explore this in more detail in our [‘local transport lottery’](#) report
- Widening and deepening the benefits that have already been brought about by greater devolution of powers over local and regional rail networks. We explore this in more detail in our [‘rail devolution works’](#) report
- Further streamlining existing legislation on buses to provide a faster route for transport authorities to have a greater say over local bus networks – up to and including franchising and direct provision of networks of bus services.

3.6. On the funding point it’s important to stress that given the relatively low market share of public transport (now exacerbated by the impact of the COVID19 pandemic) and levels of active travel in much of the city regions, there will need to be consistently higher levels of revenue and capital support in order to provide modern, attractive and affordable public transport provision alongside safe and attractive provision for active travel.

4. Decarbonisation of urban vehicle fleets

4.1. As set out above transport authorities (working with District Councils) have a key role to play on the decarbonisation of urban vehicle fleets. Indeed, there is a danger that at present this role is being neglected in favour of a more fragmented and top-down, mode-by-mode approach. So, for example, at present there appears to be very little read across between:

- The approach being taken on cars and buses. Yet for each city region these vehicles will need access to adequate power and an effective recharging network. Some of this recharging network will also be integral to the streets which District Councils manage and control.
- Transport and local authorities lack adequate leverage or status in relation to DNCs which is leading to higher costs and delays in the transport electrification initiatives which transport and local authorities want to bring forward.
- There is too little recognition of the innovative role that transport and local authorities have already been playing in making connections between transport, energy and the built



environment and the potential for them to do more. We explore this in our [Making the Connections on Climate](#) report

- 4.2. The decarbonisation of urban vehicle fleets is not only essential for wider decarbonisation goals but it also represents a major opportunity to create good jobs and to benefit local economies. However for this opportunity to be fully realised transport and local authorities need to be at the top table as part of a joined up plan which looks at all the different types of vehicle fleets (and the power supply they will need) in a holistic way.
- 4.3. In addition to this there needs to be a review of current end points for manufacture of petrol and diesel vehicles (including cars, buses, light vans, HGVs, taxis) alongside the wider taxation and fiscal regime for road vehicles (including scrappage schemes). The aim of the review should be to accelerate the availability, diversity of supply and reduction in cost (both in absolute and relative terms) of zero emission vehicles in order to more rapidly incentivise their take up.

Transition of cars to zero emission

- 4.4. Additional specific measures the Government should take include:
 - **Financial and fiscal incentives** are required to address cost barriers and incentivise consumers to switch to zero emission vehicles.
 - **Sustained infrastructure funding is needed in rapid charging.**
 - A **Dynamic National Charge Point Registry is needed** with an obligation on operators to provide data on charge points.
 - **Standards for plug-in hybrids** which set minimum performance and standard requirements including on zero emission ranges and geofencing capability.
 - **Adequate regulations to ensure charge points are compatible with all vehicles** alongside universal payment methods and reliability standards.
 - **Futureproofing charging technology.** Further R&D is required for smart charging and vehicle to grid technology. This will alleviate impacts of electrification on the grid and help future planning of charge points to ensure that infrastructure which is delivered is resilient to changes in mobility and can serve different fleets.

Electrification of the rail network

- 4.5. The UK needs a rolling programme of rail electrification which should include the vast majority of urban rail networks. Most counterpart European countries did this decades ago because of the clear advantages that electrification brings in terms of cost, reliability, journey times, environmental benefits and efficiency. As the grid decarbonises the carbon imperative further strengthens the case. A rolling programme would also bring about cost efficiencies in implementing the programme as well as allow for better long-term planning of rolling stock.

E-bikes

- 4.6. E-bikes have major potential to bring about modal shift for certain demographics, journey types and geographies where a transition to public transport or conventional bicycle would be difficult or unrealistic to achieve. For example, for the less mobile and older people and within



lower density suburbs and neighbourhoods. There is a case for national and local government working together to bring down the costs of access to e-bikes and to further promote their take up.

Electric buses

- 4.7. Local transport authorities should play a key role in the implementation of the Government's plans for a major investment in electric buses as part of the £3bn additional funding for buses which the Government has promised. If this does not occur then there could be state aid issues around investing in the assets of incumbent monopoly operators as well as the risk of cementing both those monopolies in place and/or the current format for bus provision in a way which makes it more difficult for those areas which may want to move to franchising in particular. As well as the buses there is also the supporting charging infrastructure to consider where local government will have a role to play on-street and potentially in relation to wider developments around existing or new bus depots.

Decarbonisation of Taxis and Private Hire Vehicles (PHVs)

- 4.8. District councils already play a key role on taxi and PHV fleets through the licensing process and many areas have incentives in place to support low and ultra-low emission vehicles in the fleets. But more will be needed to see a taxi and PHV sector that is fully decarbonised. Zero emission capable (ZEC) hackney carriages are now in use, however these vehicles are significantly more expensive than conventional diesel taxi. In London TfL has run a 'delicensing' scheme to support drivers to switch to ZEC taxis, offering a payment of £10,000 to the first 1,250 applicants. In Nottingham the council has supported the shift to low emission taxis through home charge point grants and vehicle trials. Where a city region wishes to do so taxi and PHV licensing could be taken up to the city region authority level to develop a strategic approach to decarbonisation across the region, as is seen in London.
- 4.9. We explore some of these issues further in our 'Taxi! Issues and options for city region taxi and private hire vehicle policy' report which can be downloaded [here](#).

Decarbonising urban freight

- 4.10. Decarbonisation of freight needs to be a key element of the transport decarbonisation plan. In the city regions freight consolidation centres, supporting the shift to cargo bikes and increasing the amount of freight moved by rail and inland waterway can all contribute.
- 4.11. The Government's recent active travel vision announced the piloting of compulsory freight consolidation schemes in one or two small cities which is welcome. One of the reasons why we have so few such schemes in the UK at present is that they have not proved to be commercially viable. Ensuring that the taxation and fiscal regime for road haulage better reflects the environmental, safety and road maintenance costs from road freight would help address this problem – as well as making rail freight and inland waterways more competitive. National Government also has a key role to play in supporting research and development (and providing leadership) on low or zero emission formats for heavy goods vehicles and their subsequent take up.
- 4.12. There is also the need for a clear national strategy on hydrogen which could provide a way forward in the decarbonisation of HGVs and other larger vehicles.



4.13. We explore some of these issues in more depth in our 'Delivering the future' report which can be downloaded [here](#).

Decarbonising public service vehicle fleets

4.14. National and local public service vehicle fleets make up a significant proportion of road traffic – including those associated with the emergency services, waste collection, health and social care and local authority services.

4.15. Adequately funded local authorities will be better able to transition their fleets to zero emission more rapidly. Wider national vehicle taxation and grant schemes can also play a part. National Government can also play a role on vehicle fleet policies via the influence it has over the health sector in particular.

5. Overarching national policies

a) In terms of the plan itself:

- It focuses on the end goal of 2050. Short term and interim targets are required.
- A specific greenhouse gas reduction target should be set for transport.
- The plan distorts how far transport is short of meeting the UK's legally mandated fifth carbon budget which must be met by 2032. The trajectory set out in the plan should reflect the Net Zero commitment and support delivery of future carbon budgets.
- The plan should include international aviation and shipping emissions in future carbon budgets

b) There is a need for more analysis and understanding of life cycle carbon generation from transport infrastructure investment and policies. This would enable funding decisions for large transport infrastructure projects, and wider transport policy decisions. We therefore encourage Government to work towards embedding life cycle considerations in all aspects of transport decarbonisation, including in its funding decisions, and to provide guidance for transport authorities on how lifecycle impacts can be built into their own decision making processes.

c) Investment in additional road capacity via the national roads programme remains significant and difficult to justify given that the evidence suggests that new road capacity generates new traffic as well as low density, car-dependent sprawl. The Government should review the national road programme on its impact on carbon emissions but also on alternative uses of the funding which is currently being devoted to the expansion of the road network.

d) The Government should also review its wider fiscal, pricing and taxation policies on transport (including in relation to the pricing and formats for public transport) to ensure that it aligns with wider carbon reduction goals by encouraging the use of less carbon intensive modes and discouraging the use of more carbon intensive modes.

e) The system of appraisal of transport schemes should be reviewed in order to ensure that it more fully reflects the carbon impacts of the schemes it is being used to appraise.



- f) Any reform of the planning framework should be based on ensuring that new developments, or conversion from existing uses, is based on enabling easy access on foot, by bike and by public transport – as well as with any necessary charging infrastructure for electric vehicles.
- g) The public sector (including local government, the NHS, schools colleges and universities) can play a major leadership role in promoting modal shift and the decarbonisation of their own vehicle fleets as well as those vehicles used by their staff and suppliers. This requires better joint working between these sectors, their home Whitehall Departments and local transport authorities.
- h) A transport decarbonisation plan also requires behavioural change which will also require a continuous public information campaign around the availability and benefits of making the change to less carbon intensive travel choices. This is something that should also be carried out in consort with local transport authorities in relation to the local specifics.
- i) Whilst exhaust emissions are set to decline as road vehicle fleets decarbonise non-exhaust emissions (NEE) from road traffic have been slowly increasing and are becoming a much larger share of overall PM10 and PM2.5 traffic emissions. Whilst further national research is required so we can better understand the impact of NEEs and how best they can be tackled one way to reduce all NEE from road traffic is to reduce mode share away from cars.