



Draft Transport (Wales) Bill

RSPB Cymru submission to the Welsh Affairs Select Committee and NAW Economic Development and Transport Committee

General Comments

1. RSPB Cymru regrets the absence of any reference in the draft Bill to the Assembly's Sustainable Development Duty (Government of Wales Act 1998, Section 121). We believe that sustainable development should be at the heart of Welsh transport strategy and, therefore, that the draft Bill should include mention of sustainable development as the policy driver ahead of such considerations as 'economy, efficiency and effectiveness'.
2. Transport use, especially road and air, has risen much more rapidly over the last 30 years than any other sector of energy use and carbon emission, and now constitutes 35% of final energy use. The promotion of alternatives to road transport, and encouragement to people to reduce the distances that they travel, are essential components of a sustainable transport strategy.
3. RSPB Cymru welcomes many of the detailed policy provisions contained in the draft Bill, in particular:
 - i. The requirement for the Assembly to prepare, publish and implement a Wales Transport Strategy, which will set out policies for the development of integrated transport facilities and services to, from and within Wales.
 - ii. The provision for the Assembly to consider and approve or refer back, with reference to the Strategy, local authority transport plans, prepared under the provisions of Part 2 of the Transport Act 2000.
 - iii. The provisions for the Assembly to give directions and guidance to the Strategic Rail Authority together with the giving of financial support in respect of any facilities or services.
4. RSPB Cymru does not support the provisions for Assembly financial assistance to air transport services contained in Clause 11 of the draft Bill. We believe that the proposed use of public funds to provide for air transport services or facilities that would not otherwise be provided, i.e. they would not be commercially viable, is inconsistent with the duty to promote sustainable development. Air travel is the least sustainable form of transport:
 - i. It is highly energy intensive and as it encourages people to travel more frequently and over greater distances; its use is increasing rapidly.
 - ii. Its contribution to global warming is about three times greater than is indicated by the level of carbon dioxide emissions alone – other greenhouse gases are also emitted from aircraft and are particularly destructive in the upper atmosphere.
5. RSPB Cymru believes that available public funds should be used by the Assembly to promote more sustainable forms of public transport, principally rail and bus, non-polluting forms of mobility, i.e. cycling and walking, and alternatives to travel such as public video-conferencing facilities. We believe that a similar investment in public 'ground' travel would benefit more people, particularly those with lower incomes.

Proposed amendments to the Bill

Sustainable Development

6. To provide for the draft Bill to contribute to the promotion of sustainable development, we propose the following amendments:

In Clause 1 – General transport duty:

Sub-section (1) (a), insert new text after ‘Wales’ and before ‘and’: ‘that are in compliance with the requirements of the sustainable development scheme made under section 121 of the Government of Wales Act 1998 and that minimise greenhouse gas emissions’.

The purpose of this amendment is to ensure that only policies for sustainable modes of transport are developed and promoted, with sustainability clearly understood in climate change terms.

In Clause 4 – Arrangements for discharge of transport functions:

Sub-section (3), after ‘interests of’ delete the word ‘economy’ and replace with new text ‘its duty to promote sustainable development,’.

The purpose of this amendment is to ensure that local authority transport plans have full regard to the promotion of sustainable development.

In Clause 7 – Provision of public passenger transport services:

Sub-section (2), add new ‘(a) the duty to promote sustainable development’, and renumber subsequent lines as (b), (c) and (d) respectively.

The purpose of this amendment is to ensure that the Assembly has regard to its duty to promote sustainable development in the provision of public passenger transport services.

Air Transport

7. To remove from the draft Bill proposed powers to enable the Assembly to subsidise air transport services we propose that Clause 11 (Financial assistance: air transport services) be deleted.

The purpose of this amendment is to remove from the draft Bill any provision for the Assembly to subsidise non-commercial air transport services or facilities. Air transport support is not compatible with the Assembly’s duty to promote sustainable development.

8. The Royal Commission on Environmental Pollution, in its 2002 report ‘The environmental effects of civil aircraft in flight’, stated that ‘rapid growth in air transport [is in] fundamental contradiction to the Government’s stated goal of sustainable development’. The UK Government’s 2003 Energy White Paper ‘Our energy future – creating a low carbon economy’, set a national carbon emissions reduction target of 60% by 2050 to deliver an environmentally safe maximum level of greenhouse gases. However, at least half of this target is likely to be negated if the UK Government’s predictions for the uncontrolled rate of growth in national and international air travel are realised.

9. Public funds should not be used to promote the further expansion of air travel beyond even commercially viable levels. Public travel needs within Wales can be adequately met by the improvement and expansion of rail services and facilities, at far less environmental cost.