



Arbenigwyr mewn Busnes
Experts in Business

FSB Wales response to Cardiff Council

Transport and Clean Air Green Paper

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About FSB Wales

FSB Wales is the authoritative voice of businesses in Wales, with around 10,000 members. It campaigns for a better social, political and economic environment in which to work and do business. With a strong grassroots structure, a Wales Policy Unit and dedicated Welsh staff to deal with Welsh institutions, media and politicians, FSB Wales makes its members' voices heard at the heart of the decision-making process.

Introduction

- 1.1. FSB Wales welcomes the opportunity to comment on Cardiff Council's Transport and Clean Air Green Paper. Both issues are vitally important to the city and its economy. FSB has written extensively on these issues in both England (in relation to Clean Air Zones) and Scotland (in relation to their Low Emission Zones). As such, we hope to draw on experiences from elsewhere in our submission to inform Cardiff Council's approach.
- 1.2. There is no doubt that poor air quality is harmful to our health and in many urban areas, including Cardiff, improvements to air quality will lead to better living standards. It is also important to recognise that the city's economy in its current configuration is driver of poor air quality.
- 1.3. Making improvements to air quality in Cardiff will be a complex issue and will require the local authority and business to work closely together to encourage positive behaviour, in a fair and transparent way. We believe small businesses are ready to play their part in tackling air pollution but it will require the local authority to set out pathways towards this that are affordable, achievable and proportionate.
- 1.4. In order to inform this response, we held an informal Doopoll on the local authority's proposals and also a focus group, at which Cllr Wild presented the authority's 18 policy proposals. The feedback from the group was constructive and positive and reiterated the willingness small firms have in making Cardiff a better place to live and work.

The Future of Buses and the Metro

- 2.1. FSB Wales has long supported the introduction of the Metro. We believe it provides a great opportunity to redefine transport in South East Wales, to ease congestion and to introduce things like integrated ticketing that have long been on our members' wish list. For that reason, we are supportive of the authority's ideas in this area.
- 2.2. In our focus group, members were keen to see the Council explore ways in which to make buses more affordable. In particular for young people and new graduates.



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Members also raised the issue of making bus routes serve the needs of business to a greater extent.

Clean Air City

- 3.1. In relation to the proposed Clean Air Zone, FSB Wales has the following observations and suggestions:
- 3.2. **A phased approach** – Many businesses invested in diesel cars previously as a result of assurances by government that this was the environmentally friendly approach. Whilst policy-makers have increasingly become aware that this is not the case, small businesses should not be punished for following the advice of government. Furthermore, many smaller firms either outright own older vehicles, or use vehicles purchased on a lease or hire-purchase basis which means they will have little opportunity to respond by having a greener fleet in the short term. As such, and in line with other European zones, we would suggest the local authority should have a phased approach to introduction with a clear timeframe to help inform decision around vehicle fleets among small firms.
- 3.3. **A National Framework and Charging Scheme** – It is crucial that any proposed Cardiff Clean Air Zone is properly situated in a national framework. We are aware of Welsh Government's current consultation on air quality that begins to address the issue of a national framework for zones. There are 10 local authority areas within the Cardiff Capital Region with business crossing authority boundaries every day. If all authorities independently operated a zone and charging process then the cost of compliance would be prohibitive. We therefore believe Cardiff Council should work with Welsh Government to create a National Charging Scheme for Wales that would allow policy flexibility but within a national framework if the decision is taken to pursue a charging zone.
- 3.4. **Economic Impact** – Before introducing a clean air zone, Cardiff Council should carry out a thorough economic impact assessment. This would need to properly assess the impact on residents and businesses affected by the zone and would highlight any potential areas of concern for reflection in the policy development.
- 3.5. **Exemptions** – The local authority should make short-term hardship exemptions available for certain firms where it can be demonstrated that the cost of upgrading vehicles is prohibitive or would lead to the business closing.
- 3.6. **Communication** – it is vital that in implementing any zone, the local authority communicates effectively with those likely to be impacted. This should include clear timescales at every phase of implementation as well as sign-posting to relevant support and advice such as Business Wales.



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- 3.7. For active travel targets to be successful, the local authority should collaborate with local businesses to encourage them to consider new ways of travelling. This be part of a conversation with local firms, with clear support mechanisms in place for those who wish to shift towards active travel.
- 3.8. FSB Wales would caution against a workplace parking levy without further research and understanding of the potential impacts.

Active Healthy City

- 4.1. Cardiff Council has a clearly defined agenda around active travel including initiatives such as Nextbike, the roll out of dedicated cycle lanes and other interventions to support active travel. In broad terms, we are supportive of this agenda however we believe more could be done to support local small firms to consider active travel options for their staff and their business needs. This means going beyond installing infrastructure and should include a thorough engagement exercise with firms.
- 4.2. In relation to Active Travel Zones, there is an inevitable tension between pedestrianisation and car parking availability that has a varied impact on firms – with some benefiting and others losing out. For that reason, we believe active travel zones if implemented should as a minimum include thorough engagement with local business to ascertain impact and should be introduced only when viable alternatives are available to ensure the continued operation of local businesses. For instance, working with firms to design delivery hours for certain areas to ensure they can get products in and out of their business.
- 4.3. In our Doopoll survey, respondents suggested that a 20mph city wide scheme was less of a priority. This suggests more targeted speed limits would be more appropriate.

Business, Work and Culture

- 5.1. FSB Wales is supportive of the ambitions of the local authority in relation to the Business, Work and Culture sections of the consultation. In particular, we believe increased park and ride options at both rail interchanges (such as has taken place in Radyr) and on the M4 would provide an alternative to drivers on currently congested routes.

The Future of Cars

- 6.1. With the UK Government's ambition to move towards no new petrol and diesel vehicles by 2040, it is important that Cardiff sets out a clear ambition to be at the front of the transition to electric vehicles. We therefore support the ambition to



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deliver increased electric vehicle usage and the installation of a comprehensive network of charging points. As a minimum, charging points should be situated at key interchanges (such as park and ride facilities) and at key areas of employment (such as business parks).

Smart City

- 7.1. FSB Wales welcomes moves to increase the use of digital technology to improve the way services are delivered in Cardiff. For instance, we note that Cardiff Council has installed sensors in all its parking to inform those travelling into the city where they can park. We would like to see this taken further, possibly including private parking provision if possible and linking up more directly to other transport services such as Nextbike locations, bus timetables and live traffic reporting. It is also vital that the authority raises awareness of existing services such as the parking app.

Conclusion

- 8.1. Transport plays a crucial role in the economic and environmental fabric of Cardiff as a city. We welcome this consultation and hope that the authority is able to further the discussion with SMEs in taking forward its proposals in a way that is proportionate and encourages buy-in. We hope to work with the authority to develop these proposals further to ensure that Cardiff can become a city with a thriving SME sector.