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Russell George AM
Chair
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National Assembly for Wales
Ty Hywel
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20 February 2020

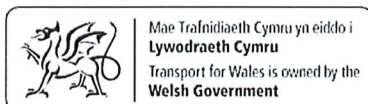
Dear Mr George

In response to your recent query regarding the RABA Modal Comparison Carbon Footprint (MCCF). Unfortunately MCCF contains very little information or calculation that can assist us in making any valuable comments. Our view is that is very difficult to make comparisons between the different modes of transport given the assumptions made in the report, for example:

The Model states that it has based the journey by rail from Cardiff to Manchester on a TfW train from Cardiff to Crewe at 35% load, there are many unexplained issues here – The calculation for load factor is not explained, TfW are operating limited available trains at high capacity and have been doing so since the start of the franchise. We also assume that a large number of passengers getting on an off on short journeys in between Cardiff and Crewe are not being accounted for in the carbon emitted per passenger per kilometre calculation.

The average duration of a journey from Cardiff Central to Crewe is 3 hours and 4 minutes not 4 hours and 40 minutes as reported in the tool. The journey from Crewe to Manchester has not been detailed – we are unaware of how this journey is assumed – even adding this addition time from Crewe to Manchester by train is only an additional 35 minutes.

A journey by plane direct from Cardiff to Manchester does not currently exist, the journey is either via Jersey, Dublin or Belfast – there is no explanation of how the 82% load factor has been calculated (assumed) for this journey.



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The journey time by plane from Cardiff to Manchester has been assumed as this journey does not currently exist, current journey times to Manchester from Cardiff by plane are over 4.5 hours.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'James Price', followed by a comma.

James Price
Prif Weithredwr / Chief Executive