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Symbolic Meta-Policy: (Not) Tackling Climate Change in the Transport Sector

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This paper seeks to understand how the UK government's headline climate change targets are translated into action at the local level in the transport sector drawing on the findings of research in two English regions. In doing so, these headline targets are identified as a symbolic meta-policy that results in little action on the ground and which challenges established conceptions of policy implementation. Both the 'meta' and 'symbolic' aspects of the policy offer part of the explanation for the lack of substantive action on the ground. As a meta-policy, the headline targets across government require the elaboration of other policies at other levels such as targets for government departments and local authorities, but these are largely absent, leaving the meta-policy without teeth. Over time, these headline targets have developed into a symbolic policy, serving political goals but having little practical effectiveness.

Keywords: climate change; implementation; symbolic policy; meta-governance; transport

This paper seeks to understand how the United Kingdom government's headline climate change targets are translated into action at the local level in the transport sector. In doing so, we identify these headline targets as a symbolic meta-policy that results in little action on the ground and which challenges established conceptions of policy implementation. Both the 'meta' and 'symbolic' aspects of the policy offer part of the explanation here. As a meta-policy, the headline targets across government require the elaboration of other policies at other levels such as targets for government departments and local authorities, but these are largely absent, leaving the meta-policy without teeth. Over time, these headline targets have developed into a symbolic policy, serving political goals but having little practical effectiveness.

While interest in meta-policies and the related concept of 'meta-governance' has grown significantly in recent years, there has been little attempt to link these notions explicitly to the longstanding literature on policy implementation (notable exceptions are O'Toole (2004) and Peters (2007)). Yet there is an important research agenda here. If meta-policies and meta-governance are significant empirical developments we need to develop appropriate theoretical tools for understanding how they are (or are not) translated into action. This involves an appreciation of the extra steps and potential gaps in the implementation process meta-policy necessitates, which is highlighted through discussion of top-down and bottom-up dynamics of the cases presented here. Such analysis might also include recognition of the potential for meta-policies transmuting into symbolic policies, not least in the context of internationally agreed goals that require domestic implementation. This linking of meta-policy to symbolic policy provides a novel dimension to the paper.

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Our starting point is to explain our approach to policy implementation and the concept of 'meta-policy'. Following this we turn to our case study of climate change and local transport policy, drawing on the findings of research in two English Local Transport Plan (LTP)[1] areas. After that, we analyse developments and explain how we come to understand the government's headline targets for climate change as a symbolic meta-policy. Here we put forward a revised taxonomy of meta-policy that makes a distinctive contribution to policy analysis. The article concludes by arguing that the government's approach to the implementation of its carbon reduction goals in the transport sector signals a meta-governance style that is bound to fail given the constellation of interests in local networks and prevailing economic conditions. The failure to address the situation suggests that the carbon reduction target is best understood as a symbolic meta-policy.

Policy, Policy Implementation and Meta-Policy

'Policy' and 'implementation' are commonly viewed as two sides of the same coin (Hall, 2008) in the sense that policy is not 'made' until it has been implemented. To understand this relationship it is useful to disaggregate the notion of 'policy' for a more precise understanding of the different dynamics at play in different aspects of policy. Here, the work of Peter Hall (1993) is often viewed as a starting point for challenging the conception of policy as single variable. This work distinguishes between overarching policy goals, the instruments or techniques used in seeking to attain these goals and the precise setting of the instruments (Hall, 1993, p. 278). In taking Hall's work forward, Michael Howlett and Benjamin Cashore (2009, p. 38) identify 'policy' as a 'complex regime of ends-and-means-related goals (more abstract), objectives (less abstract) and settings (least abstract)'. From this they developed a six-fold taxonomy that we adopt to finesse our understanding of carbon management policy in the transport sector (Table 1). Here we note how this policy taxonomy highlights the mutually constitutive nature of policy and implementation as the abstract goals are translated into more specific instruments that are used in the implementation process. We reflect further on the utility of this table in light of our case study.

Implementation

The field of implementation studies has moved through debates on top-down versus bottom-up conceptions to more interactive and process-based approaches that challenge this dichotomy and the idea of linearity in policy making (Dorey, 2005; Hill and Hupe, 2009). The top-down approach follows a policy decision (typically by central government) through the different stages of the policy process to see how it is translated into practice by local actors (Gunn, 1978; Hogwood and Gunn, 1984; Mazmanian and Sabatier, 1983; Pressman and Wildavsky, 1984; Van Meter and Van Horn, 1975). The bottom-up response takes local actors as the starting point to highlight the dispersed nature of control over implementation (Barrett and Fudge, 1981; Elmore, 1979; Hjern and Porter, 1981). Yet, while there have been attempts to synthesise and move beyond the top-down versus bottom-up dichotomy (Hall, 1993; Sabatier and Jenkins-Smith, 1986), no widely accepted 'implementation theory' has emerged from subsequent debate (O'Toole, 2004) and this distinction remains valuable. This is particularly so in the field of transport policy where implementation mechanisms and their effect on policy outcomes have remained relatively

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Table 1: A Taxonomy of Policy Components

		Policy content		
		High-level abstraction	*Programme-level operationalisation*	*Specific on-the-ground measures*
Policy focus	Policy ends or aims	GOALS: What general types of ideas govern policy development? E.g. controlling climate change	OBJECTIVES: What does policy formally aim to address? E.g. reduction in carbon emissions	SETTINGS: What are the specific on-the-ground requirements of policy? E.g. specific targets
	Policy means or tools	INSTRUMENT LOGIC: What general norms guide implementation preferences? E.g. limited regulation, localism	MECHANISMS: What specific types of instruments are utilised? E.g. competitive central funding for sustainable transport projects	CALIBRATIONS: What are the specific ways in which the instrument is used? E.g. promoting cycling lanes

Source: Howlett and Cashore (2009, p. 39); our examples added.

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under-theorised (with the notable exceptions of Dudley and Richardson [2000] and Marsden and May [2006]).

In relation to empirical research, top-down and bottom-up perspectives offer contrasting advantages depending on the research questions. A top-down perspective is relevant where research is interested in the effect of a particular central government policy. In this case, attention should be paid to the following top-down variables (synthesised by Sabatier, 1986, pp. 23–5):

- The clarity and consistency of policy objectives
- Whether there is adequate causal theory (the adequacy of the jurisdiction and policy levers to effect social change)
- Whether the legal structure enhances compliance of implementing officials and target groups
- The commitment and skill of implementing officials
- Whether there is the support of interest groups and the legislative and executive
- The extent to which changes in socio-economic conditions undermine political support or causal theory during implementation

Alternatively, a bottom-up perspective is relevant where research is interested in the different effects of the same policy in different places or if there is no clear central government policy. In this case, attention should be focused on bottom-up variables such as:

- The goals, strategies, activities and contacts of those involved in service delivery or rather at the 'ground level'
- The amount of stakeholder involvement in the development and execution of policy action
- The amount of discretion, collaboration and cooperation between actors at the ground level

In our case, both perspectives have something to offer as we are interested in both the effect of a particular government policy *and* different effects of this policy in different places.

Beyond the top-down versus bottom-up distinction, Laurence O'Toole's (2004) work on implementation in the closely related field of sustainable development policy is particularly helpful for identifying distinctive features that appear relevant to our case. The first is that we are dealing in some respects with an 'outside-in' policy that emerges from international negotiations; and second, that our case is one of a long-term policy commitment that requires a headline target to be kept in view while more immediate actions are taken that may challenge the short-term interests of some actors. Flowing from these features are four assessments of extant research on the implementation of sustainable development that resonate with climate change policy:

- Sustainable development is dependent upon a *meta-policy*, but researchers have yet to analyse meta-policy implementation with care.
- 'Outside-in' implementation efforts, like sustainable development, have usually been ignored in conventional approaches and frameworks.

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- The predominance of cross-sectional research designs has meant a relative neglect of the longitudinal dimension, especially longer term diachronic processes, and thus a neglect of learning during implementation.
- The challenge of combining top-down and bottom-up insights from implementation research into a coherent perspective remains, and this issue is particularly salient for understanding sustainable development.

(Source: O'Toole 2004, p. 37, emphasis in original)

While all four of these assessments have some relevance for our investigations, we focus primarily on the meta-policy dimension, which has particular resonance in our case. However, we explain our position on the other three assessments before discussing meta-policy.

First, while the policy discussed here has its origins in international agreements, it is not clear that the 'outside-in' dimension is important in relation to how the policy is implemented. Although there are numerous international agreements and activities surrounding carbon emission reductions, the UK Climate Change Act 2008 was legislated for against a backdrop of 'insufficient clarity' internationally about the action required to tackle climate change, with the Kyoto Protocol due to expire in 2012 and the EU's policy package not confirmed (Worthington, 2008). Indeed, as Bryony Worthington (2008) notes: 'The Climate Change Act was designed to create both the impetus and tools for the UK to act, decisively and unilaterally, in pursuit of a low carbon economy.' In light of this, the United Kingdom is 'unique in being the only country around the world that has introduced a long-term legally binding framework to tackle the dangers of climate change' (CCC, 2012b). In short then, the United Kingdom has gone beyond what is required in international agreements, thus relegating the importance of the 'outside-in' dimension for our study.

Second, O'Toole's (2004) point that more research needs to be done to analyse the longitudinal dimension of implementation is recognised and supported here, with our data reflecting on change over time. However, the difference between this and O'Toole's analysis is that we are dealing with a specific policy intervention – the UK Climate Change Act 2008, outlining an 80 per cent cut in carbon emissions by 2050 – rather than analysing a general normative commitment to the issue (as with the case of sustainable development). Moreover, our concern is explicitly with cross-sectional analysis, seeking to tease out variation in implementation in different contexts.

Third, O'Toole's (2004) point about the need to try to combine top-down and bottom-up implementation analysis into a coherent perspective is beyond the scope of this paper. Both approaches provide useful insights and we recognise that the key to understanding implementation is to understand the relationship between top-down and bottom-up variables rather than to treat them in isolation from each other.

Carbon Reduction Targets as Meta-Policy

The shift in the focus of policy analysis from government to governance a generation ago has been succeeded in much of the literature by a shift in focus from governance to meta-governance in order to understand the process of setting the ground rules for governance (alternatively the 'governance of governance') (e.g. Jessop, 2004;

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Sørensen and Torfing, 2008). Jacob Torfing *et al.* (2012, p. 133) provide an empirical explanation for this shift that resonates with our case:

> Limited resources in terms of time and energy and fear of not being able to understand the complex relations and technical issues at stake mean that politicians often delegate the responsibility for metagoverning networks, partnerships, and quasi-markets to public managers who in the absence of clear and extensive instructions from the politicians will have to rely on intuition, institutionalized rules, norms, and values, and the anticipation of the politicians' reactions.

In this context, meta-policies are designed 'to guide the development of numerous more specific policies' (O'Toole 2004, p. 38) and it is this sense in which government's carbon reduction targets should be understood as a meta-policy, 'situated above and beyond the normal run of policies acting within the orbit of the departmental politics of Whitehall' (Greenaway *et al.* 2004, p. 507).

Yet as Guy Peters (2007, p. 13) argues, the process of meta-governance relies broadly on instruments and logics found within conventional governance processes, there has been little empirical research on the implementation of meta-policies. Rather, implementation research has tended to focus on narrow policy domains and thus provides a mismatch with the more expansive nature of commitments 'aimed at defining and achieving progress on multiple decisions' (O'Toole, 2004, p. 38). We now turn to our case study of the local level implementation of carbon management policy in the transport sector to understand the implications of this meta-policy.

Case Study: Background

Climate change is a major global environmental challenge and the United Kingdom government has taken a leading role, notably in the development of the Kyoto Protocol (UN, 1998) and subsequently through introducing a 'legally binding' target of at least an 80 per cent cut in greenhouse gas emissions by 2050 (relative to 1990 levels). It tracks progress towards this target, and an interim emission reduction target of 34 per cent by 2020, with rolling five-year budgets (CCC, 2008). The Climate Change Act 2008 also established an independent Committee on Climate Change to advise government and to report annually to Parliament on progress.

To achieve its 80 per cent reduction target in carbon throughout the United Kingdom explicitly requires action across all sectors. With emissions from transport representing one fifth of the UK total for domestic greenhouse gas emissions it plays a significant role in moves towards a low carbon economy (DfT, 2009). The adoption of an 80 per cent target requires an almost complete decarbonisation of road transport before 2050, while the interim targets also require transport to play a role en route to 2050. Precisely what the latter means for transport is unclear as there are no interim targets for the sector. Nevertheless, emission reduction pathways have been mapped out for transport and focus predominantly on technological change including more efficient conventional engine vehicles up to the early 2020s followed by the mass market roll-out of ultra-low emissions vehicles (DECC, 2011). Measures to promote behaviour change are also being introduced (CCC, 2012a). In the earlier years the balance between the contributions expected from

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technological improvement and behavioural adaptation is unclear, though by 2040 most reductions are expected to have been achieved through technology.

The Climate Change Act 2008 acknowledged that the United Kingdom's carbon management framework would have a 'complex interplay of reserved and devolved responsibilities' (DEFRA, 2008, p. 12). This complexity is illustrated by the introduction of the Climate Change (Scotland) Act 2009 and the Scottish (and Welsh) governments' responsibility for transport. As such, the methodological approach of our project was to select two case study areas in England and two study areas in Scotland and compare the impact of devolution. For the purposes of this paper we focus on the two English cases: the West Yorkshire and Greater Manchester LTP areas. This is partly due to space constraints, but also so as not to overcomplicate the empirical dimension. Moreover, our findings on Scotland do not show particularly significant variation at the local level from the English cases, despite the Scottish government setting a more ambitious interim target (Flinders *et al.*, forthcoming; Marsden *et al.*, forthcoming).

In the literature there are numerous studies of sustainable transport policy in the United Kingdom. The focus of studies on transport governance tends to be on the success or failure of specific policies in different contexts (e.g. Stead *et al.*, 2008; Wang, 2010) or on the role that different institutional arrangements might have on the implementation environment (Docherty and Shaw, 2008; Mackinnon *et al.*, 2008; Marsden and May, 2006). The latter group of papers has been informed more generally by theories of policy transfer and comparative analysis than the implementation base which we draw on here. Geoffrey Dudley and Jeremy Richardson (2000) provide the most in-depth study of policy implementation in their analysis of the rise and fall of the roads sector, rail privatisation and the Beeching rail reforms of the 1960s. While rich in its discussion of implementation, it provides a *post hoc* reflection of outcomes and on issues which are highly siloed in the transport sector. Recent approaches have extended to the study of climate change policy in transport (Marsden and Rye, 2010, Anderton, 2010; Niemeier *et al.*, 2011) but again these studies are silent on implementation theory, with comparatively little nuance about which parts of policy implementation have been impacted. There is, therefore, a clear need for enhanced theoretical tools to provide direction or challenge to the calls for institutional reform that have emerged.

Case Study Areas and Methodology

West Yorkshire has a population of 2,226,058 covering 155,153 hectares (ONS, 2012). The five local transport authorities within West Yorkshire (Bradford, Leeds, Calderdale, Kirklees and Wakefield) work together through the West Yorkshire Integrated Transport Authority, supported by the West Yorkshire Passenger Transport Executive, in order to create a joint LTP for the whole of West Yorkshire. In keeping with Department for Transport guidance, the current (third) West Yorkshire LTP includes low carbon among its objectives. However, transport governance in this locality has become increasingly complicated. In 2012 the Leeds City Region partnership, which incorporates all the West Yorkshire local authorities, plus Craven, Harrogate, York and Barnsley, gained some limited powers over transport through involvement in the West Yorkshire Plus Transport Fund (Leeds City Council, 2012a). The City Region has a private-sector-led

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Green Economy Panel which has produced an agenda for actions towards a low carbon economy.

Greater Manchester has a population of 2,682,528, covering 127,603 hectares (ONS, 2012). Having previously had a similar governance structure to the West Yorkshire LTP area, in April 2011 Manchester City Region formed a Combined Authority of its local authorities[2] and the Greater Manchester Passenger Transport Executive, to pool resources into a body called 'Transport for Greater Manchester'. Relative to West Yorkshire, this combined authority has greater control over transport policy within its territory.

This paper draws on the findings of a comprehensive literature review and 32 semi-structured elite interviews conducted in the case study regions and with actors at the UK and EU levels.[3] In addition, towards the end of the research, workshops were held in Leeds, Manchester and London where findings were discussed with those interviewed alongside a broader range of stakeholders in order to triangulate our findings.

Implementing the Climate Change Act 2008

Responsibilities and Accountabilities

The responsibilities and accountabilities within the process of implementing the Climate Change Act appear substantial. There are short-term targets and 'legally binding' longer term targets. There is a need to report annually to Parliament and there is an independent expert body (the Committee on Climate Change) to advise on targets and policies and monitor progress. For the United Kingdom government the processes of accountability are summarised in the Carbon Plan[4] in a section called 'Managing Our Performance', which notes that there is a 'robust framework to track progress and flag when issues or policy changes mean that we risk going off track' (DECC, 2011, p. 118). Within this framework, the Committee on Climate Change

> publishes an annual report in which it scrutinises the government's progress in meeting carbon budgets. The government has to lay a response to the points raised by the CCC before Parliament by 15 October each year. The statutory requirement to produce a report on policies after a new budget has been set also forms part of the accountability regime under the Climate Change Act (DECC, 2011, p. 118).

However, analysis independent of the government suggests that the accountability process is not as strong as it might appear (Client Earth, 2009) and this resonates with our findings. Despite the hard language of 'legally binding' commitments, Client Earth (2009) note that the Act does not include an enforcement mechanism and suggests that the opportunities for enforcing legislation through the courts via judicial review in the United Kingdom are very weak and that recent cases indicate that any challenge to the government in court would have little chance of success. In relation to accountability the report concludes that:

> the core philosophy of the Act is that this series of built-in duties, actions and reporting requirements, combined with the monitoring function of the CCC, and the scrutiny role of parliament, will create transparency, accountability and political pressure to ensure that governments will comply. Compliance with the legislation is therefore institutional and political (Client Earth, 2009, p. 30).

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Given the apparently conflicting forces of the unprecedented nature of the problem, the necessity of a huge reduction in emissions and the novelty of the Climate Change Act, it is difficult to say just how effective these 'institutional and political' forces will be. Our research suggests that in relation to local transport policy the answer, for the time being at least, is 'not very'.

Local Authority Areas and Local Transport Policy

In England and Wales there is no statutory requirement on local authorities to achieve carbon reductions, and certainly there are no specific carbon targets or budgets. In 2008–09 the Labour government was developing a Local Area Agreements system, which would have included some form of agreement on the contributions expected of each local authority. However, the coalition government scrapped these plans under the Localism Act 2011, leaving no clear framework that bridges local and national government. The Committee on Climate Change notes that local authority priorities in relation to carbon emissions have been reduced and they suggest that local authorities introduce carbon plans though not local carbon budgets and targets (CCC, 2012a). In relation to local transport, no specific emission reduction requirements come from national transport policy as there are no transport reduction targets.

This does not mean that there are no emissions reduction targets in local authority areas or in local transport policy. In its climate change strategy the Greater Manchester Combined Authority has announced a target of 48 per cent reduction in aggregate emissions (on 1990 levels) by 2020 (Greater Manchester Combined Authority, 2011). However, the Authority has not yet given more practical and meaningful targets. For example, it does not say what the 48 per cent target means in terms of reductions from now (2013) to 2020. Leeds City Council (2012b, p. 11) also has a climate change strategy in which it states it is committed to reducing total carbon emissions by 80 per cent between 2005 and 2050, 'broadly in line with the UK Climate Change Act'. In turn, it has an interim target of a 40 per cent reduction in carbon emissions between 2005 and 2020 (Leeds City Council, 2012b, p. 11). However, neither West Yorkshire Integrated Transport Authority nor the Leeds City Region appears to have aggregated carbon targets. The main point here though is that the extent to which these targets exist and are meaningful is decided locally: there is no national framework requiring, incentivising or monitoring such targets.

In key cases of local transport policy carbon reduction is one of a small number of core policy objectives set out by national government to guide the development of local plans. Thus, in Greater Manchester's LTP3 published in 2011, it dutifully states that one of its five objectives is 'to ensure that carbon emissions from transport are reduced in line with UK Government targets in order to minimise the impact of climate change' (TfGM, 2011, p. 19). In West Yorkshire, the second of three key objectives in the LTP3 is low carbon: 'To make substantial progress towards a low carbon, sustainable transport system for West Yorkshire, while recognising transport's contribution to national carbon reduction plans' (WYLTPP, 2011b, p. 27).

The third LTPs acknowledge in quantitative terms the scale of the emissions reduction task but do not include specific reduction targets for transport. Thus in the Greater Manchester LTP3 it is noted that current total emissions of 15.8 million tonnes per annum

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'need to be reduced to below 10 million tonnes by 2020 and to below four million tonnes by 2050'. Carbon emissions from transport 'account for over 30% of total emissions, and future growth projections suggest that radical change will be required if we are to achieve the more ambitious low carbon targets' (TfGM, 2011, p. 16). In a section on indicators and targets CO_2 emissions from road transport are mentioned as an indicator but no numbers are given as targets (TfGM, 2011, p. 185). In the West Yorkshire LTP3 the national aggregate reduction targets identify road transport 'as one of three key areas where change is most critical in meeting the targets' (WYLTPP, 2011b, p. 32). However, following this statement the objectives and policies are then only described in qualitative terms. In a section on 'targets and monitoring performance' a number of indicators are given, some related to carbon, but they do not include carbon itself (WYLTPP, 2011b, p. 99).

Subsequent to the publication of the LTPs, more specifics on carbon targets for transport have been developed. In Greater Manchester an internal report of the Greater Manchester Environment Commission in July 2012 stated that it had 'agreed an interim target for transport of a 19% reduction in CO2 emissions between 2005 and 2020. ... This target will be replaced once more detailed and comprehensive work on carbon metrics for transport has been completed' (GMEC, 2012, p. 2.2).[5] In West Yorkshire, a 2012 document on key targets and indicators associated with the LTP3 was published and included a target for CO_2 emissions from transport. The figures are to achieve a reduction of 30 per cent from the baseline year of 1990 by 2026, specifically 1.828 $KtCO_2$ in 2026 from 2.611 $KtCO_2$ in the baseline year (WYLTPP, 2011a). The target is for annual road traffic emissions of CO_2 across the West Yorkshire local highway network (excluding motorways); this target was chosen as it is data said by the Department of Energy and Climate Change to be within the scope of influence of local authorities.

Processes of performance management and accountability are described in the LTPs. In Greater Manchester a series of indicators and targets are given in the plan (though not including numbers for carbon) (TfGM, 2011, pp. 182–6). They state that a 'more mature approach to judging performance against targets' will be adopted:

> Performance information will first be considered by officer working groups. Agreed actions will then be authorised by the Transport for Greater Manchester Committee. Members will receive a full summary of performance at least annually, with arrangements for reporting against headline indicators (TfGM, 2011, p. 186).

In the West Yorkshire LTP it is stated that:

> there has been much more flexibility ... to develop indicators which are of the greatest local relevance to the LTP partners and stakeholders. There are no DfT imposed targets and DfT requirements for assessment are reduced. The emphasis within this LTP is for benchmarking and communication of performance for greater responsiveness to delivery issues (WYLTPP, 2011b, p. 97).

The communication of performance would be to senior managers and politicians and ultimately to transport users. The LTP, however, gives little detail on this process, although it suggests that more detail will be developed, such as firming up targets and reporting processes.

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The National Level

Interviews at the national (UK) government level confirmed the views found at local level. Civil servants (interviews 2011 and 2012) acknowledged that there was no carbon budget for the sector and that, while projected emissions reductions have been stated for individual policy initiatives (DECC, 2011, p. 197), this did not amount to a sectoral target. It was stated by government officials that the local area targets being developed by the previous government were rejected for 'unknown methodological reasons'. Instead, the Department for Communities and Local Government had developed local carbon frameworks, which consisted of nine pilot studies to help develop templates for action across all local authorities.[6] Because of uncertain future technological and economic developments government officials stressed that flexibility – i.e. no sectoral targets – was the best way to reduce emissions efficiently.

Local government and transport authority actors were not strongly critical of the government's flexible approach but, in developing their own local plans, felt they had little that was substantive or consistent to work with and some noted the weak national framework and lack of a clear push from central government:

> [T]he first thing we've done is try and work out what a carbon budget for West Yorkshire would be, looking at national guidance, the Climate Change Act, a number of reports ... to identify what are the national targets and indeed what are the local targets. And where we got to very quickly on that is there are a few national targets ... in terms of what that means at a local level there's very little information and how you take a local transport plan and relate that back to national policy agendas and limit that to a carbon budget which is appropriate for West Yorkshire (West Yorkshire Passenger Transport Executive official, interview 2011).

> [E]verybody's tried to grapple with, and probably just needs much clearer frameworks around ... the whole issue of carbon metrics ... whilst it's very good that we've got some politicians that make very bold statements around very big numbers, we can all find it quite difficult to break those numbers down into edible chunks and into chunks that you can compare across housing and transport and economic development ... there's more needed from the likes of DECC to try and help in that regard (Transport for Greater Manchester official, interview 2011).

Other organisations and actors operating at the local or sectoral level were much less convinced by the government's flexible approach to targets. To some – notably non-governmental organisations (NGOs) operating at national and local levels – it suggested a lack of conviction from central government

> [T]he lack of interest in setting targets or indicators, sort of does downplay the importance of this agenda. And it seems to me that if we've got national carbon budgets, then they're [local targets] actually kind of making it meaningful, for what local authorities should be doing (NGO representative 1, interview 2011).

> [I]t goes back to that localism discussion earlier ... I think that something as big and as fundamentally important as tackling climate change, you cannot leave that to the localism. [It is not good enough to say] we'll let the local authorities do it, whilst we, central government, say 'that climate change is terribly important but we will leave to you to decide whether you

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> think it is important for you at the local level'. That is a recipe for it not to happen (NGO representative 2, interview 2011).

Some NGOs stressed that the national framework had weakened under the coalition government, not least because of its localism agenda, the reduced framework for delivering sustainable transport and funding cuts:

> [W]e definitely have some sort of idea that it's [the central government policy framework] been reduced or new difficulties have emerged since the new government (NGO representative 3, interview 2011).

> So really the whole national framework for applying carbon reduction to transport has been weakened, and I don't think there is any understanding at the regional, sub-regional or local level of what we should be doing. Because we've lost the various indicators as well, haven't we? (NGO representative 4, interview 2012).

Within local government strong opinions on the flexible national approach were less evident. Nevertheless, local government actors noted the weak national framework and lack of a clear push from central government:

> I suppose if there is more thrust nationally towards low carbon I think it works its way down through local authorities and other organisations perhaps more by influencing people. And I don't think there's ever been that much of a sustained push nationally ... it comes and goes a bit (Local authority transport planner, interview 2011).

> [T]here has tended to be an approach that sets a big number at a year that's some distance away it's very easy to lose track of your path to get there. One of the things that we've been trying to do again with the Greater Manchester Climate Change Strategy is to say so if we've got a big number that sits at the end of the decade, actually what we need to focus our efforts on right now is so what we do between now and 2015 (Transport for Greater Manchester official, interview 2011).

A number of interviewees suggested that a clearer framework – perhaps through negotiated targets – would be an improvement. For those seeking to advance the carbon reduction agenda, such targets would provide political leverage. Here there appeared to be an issue in some councils of officers not having sufficient justification to persuade councillors to take the issue seriously when faced with more immediate political demands.

The argument against disaggregated targets because of future uncertainty and the need for flexibility was not evident at the local level and in some cases was strongly rebutted:

> That's just a complete cop-out, though, isn't it? Because you can set a target and then you can review that target on an annual basis to reflect the circumstance that you're operating (Greater Manchester business organisation representative, interview 2012).

> [T]hey are flexible because there are uncertainties about the future transport world. However, overall the Government must meet its carbon targets so they've got to do something in the transport sector to work towards that. In a sense, by not having targets in place now you're completely inflexible because no one knows what they are aiming for (Rail operator official, interview 2012).

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As noted above, where a clear local area target was set, this was the result of local pressure – not national. On the source of the pressure for moving towards the 48 per cent reduction target by 2020 in Greater Manchester it was said:

> It comes from ... that idea that ... there is first-mover advantage here. So if we want to have that first-mover advantage, both in terms of indigenous businesses, and from inward investment, that's probably where we need to be heading towards in that time scale ... it's not central government in any way (Greater Manchester business organisation representative, interview 2012).

The Primacy of Economic Policy

The coalition government's hands-off approach to implementation could be seen as a reaction to the perceived failings of the previous government's enthusiasm for targets and audits – for some interviewees an over-reaction wrapped in the ideological cloak of *new localism*. However, the key point widely reported was that carbon reduction had been pushed further down the political agenda in favour of the economy. This was a strong signal coming from central government and interviewees reported how the government's main funding instrument for sustainable travel – the Local Sustainable Transport Fund – had prioritised bids with an economic growth focus. However, the growth and jobs agenda was signally important for local actors too – local politicians in particular. The consequence was that policy impacts on carbon reductions were often incidental:

> [T]he clear policy driver is economic growth ... a consequence of whatever we do to increase public transport patronage will have an effect on reducing carbon. But it's step by step ... it's more consequential than an intention (West Yorkshire Integrated Transport Authority Committee Member, interview 2012).

Similarly, an official from the West Yorkshire Passenger Transport Executive stated:

> There is an understanding that economic growth relies on increased jobs that infers that more people will be travelling, so there is clearly carbon consequences of supporting economic growth (West Yorkshire Passenger Transport Executive official, interview 2011).

It was noted that the creation of Transport for Greater Manchester provided an opportunity to work more coherently and effectively on the environmental challenge. However, while aspects of the carbon agenda may have been more advanced in Manchester than West Yorkshire, there had not been major differences in overall impact. In Greater Manchester too there was also the familiar contradiction between economic growth and carbon reduction and the emphasis on the former by the government:

> I think we've been through an initial period where, certainly if you take the likes of the Local Transport White Paper, it talks very much carbon first, and then I think we found ourselves at the end of the year with a Cabinet that's very concerned about the immediate here and now economic problems and it's potentially having to think about how it trades off its priorities in the short term. And I'm not saying it's done it explicitly, and I'm not saying either that I think there's some sort of sub-plot somewhere, I think there's a genuine problem that government has ... that it can't quite fully articulate, yet, in terms of how it balances the two off (Transport for Greater Manchester official, interview 2011).

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While local actors were often dissatisfied with the implementation framework and the lack of substantive policy action, this had not led to particularly strong calls for new frameworks or instruments. The main sense from the research was general acceptance that this was a period in which progress would be slow and piecemeal at best – the economic pressures were as pressing at local level as at national, with service cuts and redundancies facing many organisations and the dominant discourse around growth and jobs. Carbon reduction remained one objective among a number that guided local authorities in developing policies, but was not monitored and there were no incentives and sanctions in place to promote it.

Generally, the local-level instruments that reduced carbon emissions – whether promoted by local authorities, bus companies or others – were a limited number of initiatives that generally served other goals first and the effects on carbon reduction tended to be incidental and small in scale. Moreover, while there was some variation in governance structures, local targets and local policies, the net impact on carbon reduction was negligible in the context of other factors. These included the interests of key local actors including politicians and travel operators who had more at stake in the jobs and growth agenda than carbon reduction: a tension – real or perceived – that was nonetheless omnipresent.

Analysis

In the opening section we described how Howlett and Cashore's (2009) policy taxonomy highlights the mutually constitutive nature of policy and implementation, as abstract goals are translated into more specific instruments that are used in the implementation process. However, while ontologically policy and implementation are understood as mutually constitutive, analytically a temporal sequencing is necessary to investigate empirically the relationship between 'policy' and 'action' and the nature and location of any implementation 'gaps' or 'deficits' that exist. In our case, we observe a breakdown in carbon control policy at the point where policy objectives are (not) translated into specific measures on the ground ('settings'). In terms of temporal sequencing, this is conventionally the point of intersection between national and local actors. However, in relation to the Climate Change Act we identify the need for an intervening stage between 'objectives' and 'settings' that addresses the idea of a meta-policy and the additional link in the implementation chain this creates as policy moves from the meta-governance to governance arena (see Table 2). In this case, this stage would involve a translation of meta-policy targets into specific targets for government departments who would then be better equipped to steer the sectoral implementation networks in which they (and not the architects of meta-policy) are a part. The discussion of top-down and bottom-up dynamics illustrates further the need for analysis that incorporates understanding of the meta-policy dimension.

Top-Down and Bottom-Up Dynamics

The study above illustrates the role of both top-down and bottom-up variables within the implementation networks and of the relationship between them as the key to understanding implementation. This complex relationship is made even more complex when examining meta-policy. We deal with each of these dimensions in turn, beginning with *top-down* factors.

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Table 2: A Taxonomy of Meta-Policy Components

			Meta Policy Content		
		High-level abstraction	*Meta-policy-level operationalisation*	*Operationalisation in the governance arena*	*Specific on-the-ground measures*
Policy Focus	*Policy ends or aims*	GOALS What general types of ideas govern policy development? • Control over climate change	META-POLICY OBJECTIVES What does the meta-policy formally aim to address? • Reduction in carbon emissions, specifically 80 per cent reduction in CO_2 emissions by 2050 across all sectors • Interim UK target of 34 per cent reduction in CO_2 emissions by 2020 across all sectors, on 1990 levels	POLICY OBJECTIVES What does policy formally aim to address? • *GAP*: might be filled by Department-level carbon emissions targets (e.g. Transport X per cent by 2020)	SETTINGS What are the specific on-the-ground requirements of policy? • *GAP*: Might be filled by specific requirements (negotiated targets) for local/regional actors
	Policy means or tools	INSTRUMENT LOGIC What general norms guide implementation preferences? • Protection of individual freedoms • Limited regulation • Localism • Primacy of economic growth goal • Behaviour change	META-POLICY MECHANISMS What specific types of instruments are utilised? • *GAP*: might be filled with devolution of targets to government departments and linked monitoring and evaluation of departments	MECHANISMS What specific types of instruments are utilised? • Active travel • Business plans/local efficiency targets • Competitive central funding (Local Sustainable Transport Fund) • *GAP*: national monitoring and evaluation of (negotiated) local targets	CALIBRATIONS What are the specific ways in which the instrument is used? • Marketing public transport, improvements in information on transport availability, timetabling, reliability, ticketing; car sharing • Promoting cycle lanes, cycle safety training • Green Bus Fund, adherence to EU fuel efficiency standards • Councils, transport providers, efficient driving methods, travel to work plans

Source: Developed from Howlett and Cashore (2009, p. 39).

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The Clarity and Consistency of Policy Objectives. There was a clear 'headline' target of 80 per cent reduction in CO_2 emissions by 2050 across all sectors in the UK Climate Change Act 2008. However, there is a lack of 'consistency' in the sense that there are no transport-sector-specific targets for CO_2 emission reduction – the meta-policy is not operationalised effectively through other policies. This translates to there being no clarity at the local level as to what the headline target means for them and thus by the time this meta-policy 'hits the ground' it has little meaning.

Whether There is Adequate Causal Theory (the Adequacy of the Jurisdiction and Policy Levers to Effect Social Change). There is no adequate 'causal theory' built into the meta-policy in the sense that no 'settings' are articulated to accompany the meta-policy and therefore no direction given as to what 'instruments' may be the best to tackle CO_2 emissions. In essence, there are no set policy levers provided by central government. There is also uncertainty at the local level as to what policy levers/settings/instruments would be most appropriate to tackle carbon emission levels. No financial or other such resources are devolved to the local level in order to promote or support the carbon reduction target.

Whether the Legal Structure Enhances Compliance of Implementing Officials and Target Groups. At meta-policy level, the legal structure appears to 'bind' the United Kingdom government to a particular target, but the absence of policy at the operational level allows localities to work towards the headline target as they deem appropriate, with no apparent sanctions if progress is not made.

The Commitment and Skill of Implementing Officials. Interviewees appeared generally committed to the carbon reduction agenda, as long as economic goals took priority. Our research did not suggest that the skill of implementing officials was a key factor in implementation here, although there was some dispute over whether local authorities could competently 'measure' or 'account' for carbon reduction. This was not seen as an important barrier to implementation of carbon reduction measures though, as the lack of precise measures in other spheres did not prevent policies being implemented. Rather, the main issues here related to lack of incentives, sanctions and resources required to implement effective carbon reduction policies.

Whether There is the Support of Interest Groups and the Legislative and Executive. There is obviously support for carbon reduction from environmental interest groups, although the main focus of their activity is at the setting of broad goals rather than being involved in the detail of implementation in this case. This may be primarily an issue of resources being thinly spread and there being more impact to be had at the policy formulation stage. However, our research also revealed that some environmental interest groups felt excluded from formal decision-making arenas in one of our case study areas and felt largely ignored in the other. The issue of executive support is crucial here in the sense that support for carbon reduction appears to be weak or symbolic (see below). The political rhetoric remains consistently 'green', but the policy action does not reflect the rhetoric.

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The Extent to which Changes in Socioeconomic Conditions Undermine Political Support or Causal Theory during Implementation. The absence of causal theory was arguably inherent in the policy from its inception. However, the economic crisis undoubtedly meant that the policy agenda was dominated by economic growth considerations, with carbon reduction slipping down the agenda. The consequences of recession were by no means one way: there was also an appreciation that carbon levels were falling as a result of the economic downturn and this further reduced the urgency for local action.

We turn now to *bottom up* factors.

The Goals, Strategies, Activities and Contacts of Those Involved in Service Delivery or Rather at the 'Ground Level'. The primary goal of local actors in our case study localities was economic growth, with all other priorities, including carbon reduction, coming much further down the agenda. All strategies and activities relating to policy initiatives were framed around economic growth priorities. However, some individuals were keen to promote the environment and were more progressive in trying to tackle this agenda, but this did not lead to significant variations in carbon reduction policies across the case studies.

The Amount of Stakeholder Involvement in the Development and Execution of Policy Action. The case study areas revealed rather closed policy communities. Although there was consultation in these areas, the stakeholders who most closely worked with key policy officers were those for whom economic growth and business are the top priority, thus limiting the voice for the carbon reduction agenda. To slightly different degrees between our cases, environmental groups felt like outsiders in the policy implementation networks.

The Amount of Discretion, Collaboration and Cooperation between Actors at the Ground Level. There is extensive room for discretion on local carbon reduction policies, there being no legal or funding disincentives attached to not working towards the government's target. Local collaboration and cooperation is focused around economic growth and its promotion with the result that most carbon reduction is an incidental product of policies aimed primarily at other goals.

In terms of the *relational dimension,* the importance of understanding the relationship between top-down and bottom-up variables is evident here in a number of respects. The absence of top-down conditions for successful implementation discussed above allowed for extensive local policy discretion and generally limited action in this sphere. Moreover, overriding economic circumstances linked to political-electoral realities were central to the absence of specific on-the-ground requirements and subsequent local inertia. These findings raise the question of whether, in this context, this meta-policy should be understood as symbolic rather than substantive.

A Symbolic Meta-Policy

Symbolic policies are seen as having low practical effectiveness but a high 'politico-strategic' effectiveness and are often observed in the field of environment policy. For example, Sander Happaerts' (2012, p. 14) comparative study of sustainable development policies concludes that 'the policies have a very cosmetic character and can count on

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declaratory commitment, thus having a high politico-strategic effectiveness, but that they are not aimed at solving societal problems and thus have a low impact effectiveness'. This outcome is seen largely as the lack of political will to act effectively while recognising the need to do (or to be seen to do) something about the issue. Clearly, this description resonates here, as does the 'mix of generally cautious, noncommittal and non-binding instruments' with 'virtually no stringent evaluation instruments' in place (Happaerts, 2012, p. 7).

The point at which this case study departs from the tenets of symbolic policy notion is around the argument that symbolic policies are deliberately intended to fail to meet their declared objectives (Happaerts, 2012, p. 3; Newig, 2007, p. 278) and as such can be seen as a form of public deception. We do not believe this is a particularly helpful characterisation of the case here: the political reality is far more complex. The UK's carbon targets were developed to put flesh on the bones of ambiguous commitments arising from EU and global arenas. There is no reason to deduce from the evidence here that those involved in setting these targets were motivated by attempts to deceive. Rather, the shortcomings in moving the transport sector in the direction of these targets comes from the complexities and imperfections of the policy process in which economic and political contingencies matter enormously.

The downturn starting from the financial crisis in 2008 is an obvious economic change, while the election of the coalition government in 2010 saw an acceleration of the shift away from the audit culture that Labour began to unpick towards the end of its period in office. In this context, where the economy is strongly prioritised and the government takes a hands-off approach to implementation, the government's targets on carbon reduction have evolved into symbolic policy: they serve the political goal of reassuring the public that there is a policy in place while not being accompanied by substantial practical action. While this may to some extent be characterised by a lack of political will, this explanation has more strength if placed in the context of prevailing economic and political circumstances and the nature and timeframe of the policy challenge. In particular, more immediate political-electoral concerns in the context of economic crisis frame the choices of politicians in a particular way that is not helpful to the carbon reduction agenda. However, while we note that arguments are made which suggest far less conflict between strategies for growth and the environment than is generally portrayed, we found no sustained articulation of such views within the networks researched here. In this respect, our findings resonate with O'Toole's analysis of sustainable development, which suggested that:

> [G]overnments may need to find an approach for spearheading the commitment to sustainable development in practice through a set of processes and a pattern of institutional arrangements that offer some insulation from 'politics and practice as usual' if the policy is to have any traction. This need may be particularly strong in political systems where the balance is tipped heavily toward a shorter-term political calculus (O'Toole, 2004, p. 44).

Conclusion

This paper is concerned with understanding how the government's carbon reduction targets are (or are not) translated into action locally in the transport sector: ostensibly a

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study in policy implementation. However, we found that carbon reduction targets exist at a meta-policy level and this adds a new dimension to understanding policy implementation that requires amendment to Howlett and Cashore's (2009) policy taxonomy (Table 2 above). Specifically, we observed a breakdown in carbon reduction policy at the point where policy objectives need to be translated into more specific measures on the ground, suggesting the need to identify an intervening stage between 'objectives' and 'settings' that addresses the idea of a meta-policy and the additional link in the implementation chain this creates as policy moves from the meta-governance to governance arena. This is a distinctive contribution to policy analysis.

In a second stage to our argument we suggest that the meta-policy studied – the UK Climate Change Act 2008 – has developed as more symbolic than substantive but is not intentionally ineffective; the case is more about complex and contingent policy processes in the context of exogenous economic and political pressures. Of course, not all meta-policies without well-crafted instruments necessarily develop as symbolic; in other cases the instruments may be revised or the policy abandoned. The point here is that the original policy declaration continues to serve a purpose politically and, despite the lack of commitment to the policy, it would also be politically unacceptable to abandon it. The manner in which this state of affairs has been allowed to drift, with government making no attempt to sharpen its meta-policy instruments, suggests that, for now at least, carbon reduction targets are best understood as a symbolic meta-policy. However, explanations that point simply to a lack of political will for this situation fail to acknowledge complex contingencies connected to economic, political and policy cycles.

In relation to the case studies, the bottom-up analysis showed some variation in governance structures and other local differences, but there was no significant policy divergence as a result. Wider contextual factors trumped the dynamics of policy networks in relation to the carbon reduction agenda.

To some extent, these findings may not be too worrying in the context of economic recession, which itself contributes to containing carbon emissions through lower levels of economic activity. However, this situation masks a longer-term challenge that the present policy infrastructure appears ill-equipped to deal with once the economy begins to recover. Thus, empirically, our conclusions echo Guy Peters (2007, p. 7) in suggesting that the major challenge that emerges from this meta-governance process is 'how to square the coordination capacity that can be present at the bottom of the governance system with the need to supply some common direction to policies'. It is a challenge that might be met through a variety of approaches and instruments and may, as Laurence O'Toole suggests, require finding a way of removing the challenge of climate change away from the 'politics and practice as usual'. There would almost certainly be benefits if those setting meta-policy had greater understanding of and engagement with the implementation process and if those most involved in implementation were to have influence over the implementation framework. In the case of carbon reduction in the transport sector, neither condition is present and nor is there a clear sense of who is responsible for what and who is accountable to whom.

In short, the government's semi-detached approach to the implementation of its carbon reduction goals in the transport sector signals a meta-governance style that is bound to fail given the constellation of interests in local networks and prevailing economic conditions.

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The failure to address the situation suggests that the carbon reduction target is best understood as a symbolic meta-policy.

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Notes

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1 LTPs are statutory documents that are required for each local transport authority area. They provide an outline of the strategic direction and proposed policy interventions for local transport in each area.

2 The ten local authorities that make up the Combined Authority are Bolton, Bury, Manchester City, Oldham, Rochdale, Salford, Stockport, Tameside, Trafford and Wigan.

3 In West Yorkshire, interviews were conducted with three individuals from the Passenger Transport Executive, one councillor from the Integrated Transport Authority, two officers from Leeds City Council and one environmental campaigner. In Greater Manchester, interviews were conducted with two officers from Transport for Greater Manchester, one councillor from the TfGM committee, two officers from Manchester City Council, four officers from Stockport Council, one interviewee from a private transport provider, one from a business organisation and four from third-sector organisations. At national level, interviews were conducted with individuals from national government, an advisory body, organisations responsible for infrastructure, and private

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sector and non-governmental organisations, including those with an interest in sustainable transport, the environment and passenger interests. Interviews at the EU level were conducted with Commission officials.

4 'The Carbon Plan: Delivering Our Low Carbon Future' (DECC, 2011) is the Coalition government's statement of how the United Kingdom will achieve decarbonisation within the framework of its energy policy and in turn deliver on its commitment (enshrined in law in June 2011) to halving greenhouse gas emissions, on 1990 levels, by the mid-2020s. The Carbon Plan reaffirms the government's commitment to the carbon budget framework established in the Climate Change Act 2008 and sets out proposals and policies for meeting the first four carbon budgets.

5 Interviewees suggested that this 19 per cent figure was not an official one, nor was it likely to become so. It was also suggested that the means through which this target was to be met still remained under discussion, with no decision having yet been made.

6 These local carbon frameworks appear to have had little impact on the case study areas, with no interviewee mentioning them or noting them as relevant.

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