"A Sustainable Future for Transport: Towards an Integrated, technology-led and user friendly system"

Summary of UK Public Consultation

Introduction

The Department for Transport ran a public consultation in order to gather views on the European Commission Communication "A Sustainable Future for Transport: Towards an integrated, technology-led and user friendly system". This document is intended to serve as a summary of the views the Department received.

The Communication was published on 17 June 2009 and is a consultation document inviting all interested parties to provide views, by 30 September 2009, on the future of transport and on possible policy options. The intention is that the ideas put forward in the Communication will stimulate debate and encourage policy options to be identified, that will ultimately lead to the formulation of concrete proposals for the next European Commission Transport White Paper, expected towards the end of 2010.

The Department's consultation form asked for views in the form of 13 questions. The consultation was launched on 13 July 2009, with a closing date for responses on 7 September 2009.

This report summarises the responses to the specific questions asked in the consultation document. Where responses did not correspond directly with the questions posed, but took a more general approach, these comments have been considered under the most appropriate questions or will be taken into consideration as we develop our thinking over the coming months. The report does not attempt to summarise all of the comments made by respondents. However, all comments were considered, whether or not they appear in this report

34 responses were received in total. Respondents are listed at Annex A. Individual responses can be made available on request (except where the respondent has asked that their response not be disclosed and this request has been granted).

1. **What do you consider to be the most significant challenge facing transport policy over the next ten years?**

All of the respondents agreed, at least in part, with the challenges identified by the Commission. Many highlighted, as did the Commission, the challenges of an ageing population, increased migration and growing urbanisation. Many respondents proposed similar challenges and only a very small minority were able to identify a single challenge as being the most significant. The following are the additional major challenges identified as most significant by respondents.

A number of respondents identified the most significant challenge as establishment of the level of transport growth needed to sustain the economy and future economic growth, while limiting environmental impact. They emphasised the delicate nature of this challenge, highlighting the need for balance. The level of this balance varied

between respondents with some prioritising economic growth and others environmental impact.

A significant number of respondents believed that decarbonising transport was the key challenge. They referenced the need to meet existing targets, as well as any future targets that may emerge, for example for the Copenhagen Climate Summit. The pace and process by which decarbonisation is achieved, once again differed between respondents but there was a near consensus that it would need to be achieved.

Linked to this, a number of respondents identified the primary challenge as the need to shift away from fossil fuels. This argument was founded both on the carbon emitting nature of fossil fuels and on their growing scarcity and increasing cost.

The need to provide extra capacity on a sustainable basis, in order to maintain mobility, was identified by a group of respondents as their most significant challenge. They viewed this as essential to addressing congestion, which they argued would become worse without at least some additional capacity.

Connected to this, was the challenge of long term planning. Some respondents felt that without this no other objectives could be achieved, and as such they placed it as their priority.

Achieving modal shift was the most significant challenge for some respondents. They argued that by shifting travel to less damaging and more sustainable modes of transport, other challenges would be easier to tackle.

Others presented liberalisation as the most significant challenge. They argued that free and open markets were the most successful way of achieving an efficient transport system and were essential to economic growth.

One respondent highlighted the most significant challenge as dealing with potential significant cuts in public expenditure, as it would necessitate difficult prioritisation and decision-making.

A number of respondents believed that shifting transport energy sources was the major challenge. They identified a need for further electrification and increased use of biofuel as fundamental to this.

Lastly a number of respondents identified the challenges laid out in the UK DfT document "Delivering a Sustainable Transport System" as the challenges they believed most significant.

2. **What policy options do you believe that the Commission should consider in the development of the White Paper?**

Many policy options were presented in response to this question.

The option most widely proposed was internalisation of external costs. This option was based on both the principle that the polluter should pay the full cost of pollution, and also the idea that pricing signals are the most effective way to drive behaviour change. The option would lessen the price difference between public and private transport. It

would also allow the public to make informed choices based on the true cost of their travel modes to society and the environment.

A major policy option for a number of respondents was focused on reducing demand for travel. This reduced demand would lessen the need for new infrastructure and reduce the overall impact on the environment. It was argued that this reduction in demand could be achieved through decreasing need to travel through planning. This planning would focus on land use and reduction of the need for lengthy commutes to work. Remote working and other innovations were also highlighted as possible methods to reduce demand. Reducing unnecessary leisure travel was also mentioned as a way to reduce travel demand. However, other respondents were opposed to reducing travel demand, as they felt it would endanger the economy.

Another key policy option was transport energy demand reduction. This would be achieved by newer, more efficient vehicles and would allow for expansion without increased environmental impact. Linked to this was the option of more efficient use of existing infrastructure. This would focus on intelligent road systems, car sharing, high occupancy lanes, and public transport access prioritisation.

Other respondents made the case that the Commission needed to be more urgent in its approach to environment action when drafting a White Paper. They argued that the Communication at present did not give it a significant focus or attempt to enforce a timescale. They wanted to see these in any future White Paper. These respondents and others believed that explicit emission reduction regulations should be at the heart of any White Paper.

A group of respondents who wanted to achieve full market liberalisation highlighted that the Commission should focus on enforcing existing legislation on the matter, as well as removing the remaining barriers to a free pan-European transport market.

Many respondents believed that policy options that sought to create transport equality should be inserted. They highlighted that public transport can mitigate social isolation and deprivation and as such the Commission should focus on it. Policies that achieve intermodal integration were deemed to be vital by a wide group of respondents. Integration would allow for more door to door public transport journeys as well as improving the efficacy and quality of service.

A small group of respondents want to see common standards and guidelines for regulatory frameworks established. This would allow for easier cross border operations.

Lastly a large number of respondents felt that more analysis and cost benefit analysis was needed before specific policy options could be recommended.

3. What should the Commission's role be?

Most answers identified the sharing of knowledge and best practice as a key role for the Commission. A majority supported the principle of subsidiarity and expressed a need for the Commission to factor in regional and national differences when reaching its decisions. From a planning perspective, a sizeable group of respondents expressed a view that the Commission should be providing a long-term strategic planning role,

around which the Member States can base their short and medium term planning. However, the majority also expressed a desire to ensure that no increase in the regulatory burden occurred.

4. Are the trends and challenges identified in this section the right ones?

Broadly, most respondents agreed with the challenges identified. However, most highlighted a lack of detail and policy specifics. The lack of prioritisation and timescales was also sighted as a concern. This reflects its nature as a high level Communication, but many respondents highlighted that it made the trends and challenges difficult to engage with. A large number of the respondents also highlighted the challenge of urbanisation and ageing. Many argued that this would create new challenges and would have a bigger impact than the Commission alluded to. This lack of prioritisation means many respondents offered other trends and challenges; these however were covered in questions one, two and five.

5. Are there any other trends and challenges that need to be included here and require European action?

Many respondents used this section to promote their field of interest. A common challenge identified was continued increased demand for private cars as a result of European, but in particular global, long-term economic growth and increased prosperity. Linked to this was increased general demand for mobility, both internally and external to the EU. Broadly, two views on how this should be met were presented. One stressed the need to manage the demand and attempt to reduce the need for such growth. While the other view focused on meeting the increased demand, and attempting to mitigate its environmental impact. One major trend and challenge that a number of respondents felt should be included was planning. They highlighted the increasing amount of time it takes to plan and implement transport projects and the increasing scarcity of land. As such they stressed the need for long term planning, to provide for future needs and ensure that adequate land is available to meet this demand through sustainable methods. Many respondents also expressed the view that the lack of data backing up the challenges made it hard to identify what was the main challenge.

6. Do you believe that the Commission has identified the right policy objectives?

The majority of respondents did believe that the Commission had identified the right policy areas and objectives. Once again lack of prioritisation was highlighted as a drawback in evaluating the proposal. Also many felt that some of the goals needed refining.

On **quality transport that is safe and secure,** all respondents agreed that safety and security was a key policy objective. Some pointed out that public transport is already safe and increasingly secure. Others highlighted the progress in road safety, and welcomed a continuing commitment to it from the Commission. In addition a case was presented that negative safety and security perceptions can prevent uptake of public transport in some cases. Therefore countering this will help drive modal shift.

On **a well maintained and fully integrated network,** again respondents broadly welcomed and agreed with it. A few concerns were raised. First was integration's impact on competition and its place within the UK's regulatory framework. It was pointed out that this would need to be factored in and some balance found. There was also a view that public transport should not be subject to more onerous requirements, if these damaged its competiveness.

More environmentally sustainable transport. This was universally welcomed and accepted as a key policy objective. Indeed, as mentioned before, some respondents did not feel it was prioritised enough. The focus on sustainability rather than a simple focus on narrow metrics in carbon emissions was welcomed. Some suggested including business travel and commuting in companies' emission targets. In addition it was once again pointed out that the most sustainable form of transport would be a system that removed unnecessary travel.

Smart prices had majority support. However some respondents had caveats. A key caveat raised was the fact that some respondents felt that state support would still remain necessary for some public transport infrastructure programmes, notably rail. In addition concern was raised that, due to capacity limitations in certain areas, it may not be possible to achieve modal shift through smart pricing unless additional capacity is available to meet this shift. Some concern was expressed that a lack transparency could result in a loss of public trust. As such, a number of respondents suggested ring-fencing the funds or at least making it clear to the public where the money was being spent. On the related matter of cost internalisation, which was once again broadly welcomed, the issue of how to price/evaluate social good in a market pricing system was raised as an area that needs to be addressed.

Keeping EU at forefront of transport services and technology was welcomed. On the technology side there was a view that any focus should be on specification, demonstration models and minimum mandatory standards as opposed to specific solutions. ITS was welcomed and put forward as a tool to keep Europe at the forefront. A number of respondents argued that the key consideration in any technology solutions was that they focused on the user.

Planning, a number of respondents felt that more focus on planning was needed. They highlighted the increasing length of time it takes to implement new transport projects. Some felt that the Commission should make planning privileged towards public transport users and should set land aside for this. However other respondents opposed this idea. In addition the long life-spans of certain public transport modes, principally rail and maritime, means that planning needs to be done long in advance. In addition although Europe's R&D focus was welcomed by some, others felt it should focus more public transport modes.

Human capital. While welcome in principle by a number of respondents others felt that improving workers rights should not be a goal in itself.

7. **Should the EU pay attention to other policy objectives? And if so which one(s)?**

A number of different policy objectives were put forward by respondents. Some are extensions of what the Commission has proposed.

A number of respondents argued for a larger focus on urban transport. The argument was based on the fact that, by the Commission's own figures, the urbanised population will move from 72% to 84% of Europe's population. On this basis they argued that the Commission should go further in its endorsement of urban public transport.

A group of respondents argued that the Commission's policy objectives should more explicitly focus on reducing transport's impact on human health. This argument extended beyond emissions and pointed out the benefits of cycling and walking, as well the impact of noise, congestion and social isolation that transport can cause.

Another objective that a large number of respondents identified was the use of quality improvements in public transport to drive and achieve desired modal shift. This view pointed out that public transport should compete not just on price but also on quality.

Another objective that was heavily argued for by some respondents, but deeply opposed by others, was the goal of reducing the amount of travel that occurs. Those in favour argued that even with more sustainable types of transport, it would still be beneficial to reduce the demand for travel. Those opposed argued that travel was essential for economic growth, and would see continued increases in demand due to globalisation and increased prosperity.

A small number of respondents believed it would be of value for the Commission to indentify a hierarchy of environmental need. This would make it easier for compromises to be reached. An example provided was where the balance between noise and carbon pollution should fall.

Other respondents called for greater cross border enforcement, both of existing EU rules but also of issues such as speeding fines.

Other respondents believed the EU should investigate the sustainability implications of the continued growth of low-cost airlines.

Finally a number of respondents felt that the Commission needed to address the role and nature of state aid, within the transport system. However there were mixed messages on this with some respondents wanted it expanded and other seeking its further restriction.

8. **Where specific operational goals have been identified in this section do you consider them to be deliverable?**

The vast majority of respondents felt unable to answer this question. They highlighted a lack of defined operation goals in the Communication. Where goals had been outlined, respondents felt that the level of detail was too thin for their deliverability to be assessed. However a few respondents did raise a number of points. Firstly it was argued that the varying standards of safety from one Member State to another across

the EU made a set standard ineffective. They argued that the Commission should focus on spreading best practice and settling an EU-wide minimum standard. Another issue raised was the weakness of cross-border enforcement. This, it was argued, would make enforcement of safety and road regulations difficult and hard to deliver. Lastly a lack of political will was identified by a respondent as a factor that would undermine deliverability.

9. **Where the Commission has identified specific policy instruments do you believe that these are correct**

Most respondents had in effect already answered this section in their previous responses. However a few additional arguments emerged. First, one respondent argued that there were too many policies options. It argued that the high number of policy options had the potential to result in polices that would be fragmented, disjointed and possibly not mutually sustainable.

Secondly, while other respondents agreed with many of the policy instruments outlined, they did not think that the EU was the right level to pursue some of them. They believed some policies would be better implemented at a local level. Overall the Majority of the responses broadly agreed with the Commission's future trend and challenges. However most consultees argued that the paper lacked clarity and questioned how this may translate onto specific policies.

10. **If you have a view on a specific policy instrument identified by the Commission (as described in the breakdown of Section 5 in "The proposal") please identify the policy instrument and set out your view.**

The majority of the respondents rejected the Commission's suggestion to set up transnational infrastructure managers. As a general principle, the UK expects the White Paper proposals to be guided by the principle of subsidiarity. The UK has already accepted the value of EC coordination to improve the delivery of major European project. Therefore if agreed, those infrastructure managers should be set up within the principle of subsidiarity

11. **What do you think the EU's role should be?**

When answering this question most respondents answered in a similar manner to question 3. Principally that it should spread best practice, set a minimum standard and use its collective bargaining power to influence global transport issues. However a number of responses were received along the lines of the following. Where local transport frameworks and solutions are already well developed, added value from any forthcoming EU transport proposal would be better achieved by supporting the development of existing structures. This is inline with both the majority of respondents and the UK support for the principle of subsidiarity.

12. **What additional policy instruments would you wish to be included?**

Almost all respondents had covered this and the following question in their previous answers. However a few specific points which had not been mentioned elsewhere were raised. A number of respondents wanted the Commission to produce a defined Climate change transport adaption strategy that could be applied to all areas of transport policy. Some respondents felt that it would be of more use if the Commission

measured its success in decarbonising by a fuel per person measures as this was the most accurate reflection. In this light they also believed that this should be the focus of fuel efficiency work. Finally a respondent called for a policy instrument that seeks to encourage and establish the desired behaviour change the Commission wishes to bring about.

13. **Rather than policy instruments what specific policy options should the EU be developing?**

As explained above there were few comments on this section. A respondent felt that the Commission should seek to establish long term policy and vision objectives to meet the global challenges relating to transport, beyond the length of the present 10 years. Another group of respondents called for the creation of a general EU urban transport fund during the coming review of the EU budget.

Conclusion

No strong objections were raised about any of the contents of the Commission's Communication. In broad terms most respondents were supportive of the general direction of the communication. The UK Government has taken into account respondents' views and agrees with the main themes identified by the majority of the respondents. As such the UK response would expect that any future White Paper proposals to be guided by the following principles:

➢ **Leading the World in the rapid transition to a low carbon economy and transport system** by implementing policies like Aviation emissions trading and an ambitious but achievable target on New Van CO_2.
➢ **Delivering significant EU projects, such as SESAR and Galileo, through to implementation on time and budget,** making full use of programme and project management techniques and ensuring Value for Money.
➢ **Creating a regulatory environment that will allow the EU's business to prosper and the EU's citizens to move freely and efficiently throughout Europe** using truly liberalised and competitive transport operations across all modes including realising the vision of a single rail market.
➢ **Acknowledging the vital role that transport plays in wider environment, energy, trade, regional, and other EU policy** ensuring that the Directorate Generals are joined-up in discussions and policy-making, and by making best use of impact assessments to meet the challenge of balancing competing objectives.
➢ **Driving innovation through R&D and setting standards that are technology neutral, create investor certainty and deliver clearly defined and rigorous goals**. Within each mode, move the EU as fast as it is economically, socially and technologically viable to lower carbon options. Providing information and raising awareness about the benefits of behaviour change.
➢ **Recognising the potential economies of scale and weight of influence that EU level action can deliver whilst respecting subsidiarity** and the differences between Member States and between transport modes.

In addition to this summary of the consultation the UK submitted a high-level response to the Commission Communication which is also published on the DfT website. This response was informed by the results of the consultation.

The UK Government notes that some respondents do not place great weight on the benefits of public transport, feeling the best way to maintain mobility is ensuring people can use their cars. We recognise the important role played by the private car, but want to ensure that sustainable public transport is able to play its full role in tackling congestion and ensuring a low-carbon economy.

On the polluter pays principle, there were views expressed in favour of road pricing as a fair way to tax motorists. In June 2009 the Secretary of State ruled out national road pricing for the whole of the next Parliament. The Government is giving priority to measures that can be undertaken in the shorter term to relieve pressure on the most overcrowded routes, to give road users greater choice over the journeys they take, and to recognise the premium they put on the reliability and predictability of journey times. This remains the position as set out in the Command Paper, "Low Carbon Transport: A Greener Future" published on 15 July 2009.

One respondent commented that tackling climate change should be the UK priority and therefore take paramount over the economic growth. The UK Government considers both tackling climate change _and_ promoting economic growth as being equally important. The UK Government believes that those two objectives can be achieved together

The Department for Transport would like to thank all respondents who took the time to provide a response to this consultation exercise.

Next steps

The Commission consultation closed on 30 September. The UK consultees who responded to the consultation have all been encouraged to also submit their response directly to the Commission. The UK expects the Commission to issue the next White Paper with proposals towards the end of next year.

Useful links

- *For more information on the Future of Transport proposal can be found at www.dft.gov.uk/consultations/closed/eucommunication/*
- *The Government's portal, containing information and links on the Future of Transport can be found at www.dft.gov.uk/*

Air Transport Users Council
British Business and General Aviation Association
British Ports Association
Convention of Scottish Local Authorities
Chartered Institute for Logistics and Transport
East of England Regional Assembly
English Heritage
Environmental Protection UK
European Committee of the Transport and Health Study Group
Federation of British Historic Vehicle Clubs Ltd
Highlands and Islands Enterprise
Liftshare.com
LCP Consulting Ltd
Merseytravel
Merseyside Transport Partnership Response
Mouchel
National Express
Natural England
National Air Traffic Services
Network Rail
PA Consulting Group
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RAC Foundation
Rail Freight Group
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