CONSULTATION RESPONSE FORM

Commission Document 279/4- A Sustainable Future for Transport: Towards an integrated, technology-led and user friendly system

PART 1 - Information about you

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Please tick one box from the list below that best describes you /your company or organisation.	

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If you are responding on behalf of an organisation or interest group how many members do you have and how did you obtain the views of your members:

In preparing this response, we have drawn together the views of the industry as a whole and we believe our comments reflect a generally held view. Nevertheless, the opinions expressed here are those of RSSB.

If you would like your response or personal details to be treated **confidentiall**y please explain why:

PART 2 - Your Comments

General

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

The central challenge will be ensuring that sustainable development is fully understood in terms of transport, and embedded in any future policy making.

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

A safe, integrated, environmentally sustainable and high-tech transport sector are welcome policy objectives for the Commission to be pursuing. However, these policies are best delivered in a transport domain that is characterised by liberalisation, equality of costs, and responsiveness to customers needs.

Against this background the policy options surrounding sustainability should become the central agenda around which other policies can be developed; social, economic and environmental. In environmental terms, this means the principle of internalisation of external costs should be pursued - so long as it is equally applied to all transport modes, effectively levelling the field of competition between road and other sectors.

In considering policy options to develop the legislative framework, the Commission has noted that the process of market opening, where more advanced "has already proved successful". The challenge cannot however be regarded as being completely met at this time. In the rail sector this means the Commission should look to reinforce the principles already adopted but not yet fully embraced by members.

While building and developing Europe's transport sectors should obviously form the basis of any policy development, inadequate reference is made towards managing the impacts of growth such as: congestion, particularly in urban areas; managing the need for investment in addressing key capacity constraints, land take and the costs of adapting all modes to meet the increasing expectations of users with changing needs and expectations.

There needs to be recognition that the expansion of any transport sector is usually in response to other objectives such as land use planning and other government policies and initiatives. Therefore, it is necessary to ensure that transport policies are not developed in isolation, and that they take into consideration wider European/Governmental objectives.

The promotion of modal shift to more sustainable transport options needs to be included in the development of future the White Paper. The aim should be to encourage modal shift to less-carbon intensive modes of transport, such as rail. This would not only cut carbon emissions but would also offer other environmental and social benefits, such as reducing congestion, less pollution, etc.

Transport policy can also play an important role in rural areas. It can enable access to services such as health and education for communities on the rural fringe, thus reducing exclusion. It can also provide wider access to the employment market through enabling commuting. This will reduce rural de-population and help to moderate urban growth.

The White Paper should also seek to integrate transport policy with other established EU policy areas such as trade and energy. Currently the policy options proposed do not include the role of transport in supporting the economic growth and global trade of the EU, or climate change. Furthermore the policy options do not consider a target for carbon reduction for transport or schemes such as electrification of railways, that could help deliver these goals.

- **What should the Commission's role be?**

The Commission's role should be as defined in European law: to propose legislation to the Parliament and Council, and implement decisions.

In delivering the first of these responsibilities, the EU should be looking to create a **long-term framework** in which European and national planners and funders can map out, with confidence, their strategies for meeting the changing needs of Europe's people and businesses. The Commission could co-ordinate these long-term frameworks for member states, such as future sustainability measures, targets for carbon reduction (the UK has set an 80% reduction target for 2050) and capacity growth targets for transport sectors. This framework should support member states in their efforts to deliver more sustainable transport outcomes.

Finally, in this role, the Commission should steer and develop future European transport policy with input from member states. It needs to be considerate of the huge variances between states and the impacts that any pending policies could have. It should take into account these variations in circumstances and the progress each has made to date on sustainable transport. The Commission's approach needs to include sufficient flexibility to allow member states the ability to adapt policies in light of their individual circumstances.

Section III- Trends and Challenges – page 6

- **Are the trends and challenges identified in this section the right ones?**

Generally, the correct trends and challenges have been established, although the challenges of capacity constraints, congestion, and cost have not been adequately addressed.

The trends and challenges identified are issues that all member states will have to face in the future. In particular,   the combination of 'increased migration and internal mobility' and 'urbanisation' alongside 'environmental challenges' and 'increasing scarcity of fossil fuels' seem to present the most pressing challenges.   In terms of 'ageing', 'migration and internal mobility' and 'urbanisation' these challenges will vary greatly between member states. While 'environmental challenges' and 'increasing scarcity of fossil fuels' are challenges which are, generally, common to all. It is therefore essential that policy decisions include a certain level of flexibility to ensure that they are adaptable within different member states.

Particular importance needs to be given to existing commitments on energy & CO2 (EU 20/20/20 commitment and UK 80% by 2050 CO2 target). Taken together, the combination of the projected increase in migration and urbanisation alongside the need to reduce CO2 emissions in line with targets suggests that the overriding challenge is how to deliver increased mobility at a significantly reduced carbon impact.

This implies à more rail/public transport provision, increased infrastructure capacity and encouragement of mode shift to less carbon-intensive modes i.e. rail.

Sustainable Futures for the Rail Industry

In 2008, the Sustainable Rail Programme completed a Foresight Studies in Sustainable Development. This was a scenarios-based exercise through which industry stakeholders explored the future landscape in which the rail industry will operate.

Undertaking the futures work helped to identify the contexts which would significantly influence the future of the rail industry. They were:

- Increasing concern about external costs and impacts, such as carbon emissions, noise and air pollution.
- Increasing resource costs, including energy costs.
- Falling costs of technology.
- Increasingly informed, and active, customers and service users.
- Increased international links with Europe.

In terms of this consultation, the Sustainable Futures for the Rail Industry study offers an insight into the why people travel and the policy response needed to ensure that in future transport does not continue down an unsustainable path of predict and provide. It shifts away from linear decision making and considers the wider context and the multiple options that we face in terms of the future.

This study was developed for the GB rail industry, so the trends and challenges will be different when considering European transport policy. However, it is related in terms of the identifying the need to adapt policy and/or the market to influence future travel needs. This will ensure that decisions made on the future strategy for transport take into account the longer-term issues.

For more information see
http://www.rssb.co.uk/Proj_popup.asp?TNumber=713&Parent=884&Ord=

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

The trends and challenges seem to lead to a similar conclusion, that in the future there could be an increase in travel. This is particular the issue for 'Migration and internal mobility' and 'Urbanisation'.   This overall acceptance of a trend for unconstrained growth needs to be considered against the sustainable costs and benefits of each mode.

Therefore, clarity is needed in the White Paper as to the extent to which the policies proposed may have an impact on the wider framework of sustainable targets, and steps that need to be taken to understand these. Growth to the transport network needs to be managed sustainably.

Trends and challenges to be included

The following are further challenges for consideration:

We agree that the other challenges identified by the Commission in its communication are ones that are both those facing Europe as a whole and those shared by the UK transport sector and its railways. These are; an ageing population, migration, environmental challenges, scarcity of fossil fuels, and urbanisation. There are a number of additional overarching issues that have not been drawn out in the Commission's paper which we believe are also important.

A key challenge for many of Europe's networks is capacity: a strategic, long-term approach needs to ensure the European transport network can accommodate the changes identified in a sustainable manner. In a number of sectors and/or specific locations, including much of the railway in the UK, this will result in capacity constraints and will require significant investment to grow the necessary infrastructure.

A second related issue is that the development time for infrastructure projects means that long-term planning to make the necessary investment needs to begin now in order to create the transport capacity for the next 30-40 years.

A further challenge for any transport sector over this period will be meeting the rising expectations of passengers and freight consigners. While the Commission's communication rightly identifies quality transport as a policy objective, its role as a driver of modal shift is not highlighted as a challenge to achieve policy maker's longer-term environmental and social objectives.

Balancing the need to tackle climate change/CO2 and the need to maintain economic competitiveness. This is a particular issue in the transport sector where emissions have continued to rise as a result of economic growth and where significant CO2 reductions are likely to be costly.

Understanding the impact of multiple interventions, in terms of the application of a number of policy instruments and the effect they have on each other is important. It is essential that solutions are not developed in isolation to ensure that policy does not go in different directions, resulting in working at cross purposes.

Recognition of the impact of transport policy on people's life choices and understanding the extent to which policy implementation induces change, of a positive or negative nature is necessary. There needs to be assurance that choice is not further compounded through the development of policy and that people have options rather than restrictions when making decisions relating to transport. It should be recognised that transport can enable choice and having the correct policies in place can increase/improve these choices.

Managing simultaneously the interaction between the development of policy and the resulting technological challenges is fundamental. Particularly understanding how policy and technology can interact to ensure that growth in transport is managed and controlled effectively.

There is a need to recognise the cause and effect of congestion within the transport network. Focusing on finding solutions to reduce congestion and the impacts that it has on society is fundamental to the sustainable development of the transport sector.

Commission should try to ensure that, where it legislates or gives policy direction, there are no unintended or perverse outcomes for particular sectors. This is particularly the case where objectives on e.g. noise, pollution and CO2 need to be traded-off – for example requiring rail to spend £millions on expensive noise abatement would raise our cost base and make rail less competitive versus other less sustainable modes.

There is a need for the Commission to consider whether future changes in circumstances at global, European or national levels will ultimately lead to a travel-less world. Gaining a greater understanding of the impact of a travel less world will enable the Commission to effectively develop policy which can adapt to the possible change in situation.

Section IV- Policy objectives- page 9-12

- **Do you believe that the Commission has identified the right policy objectives?**

At present it is not clear how the specific objectives set will lead to and deliver a sustainable transport system. Many of the attributes included in the objectives do go towards creating a sustainable transport system, however there are various areas missing which are fundamental to its delivery.

The Sustainable Rail Programme's Rail Industry Sustainable Development Principles clearly outline the core values of the rail industry that are fundamental in delivering a sustainable railway. Although these were specifically developed for GB rail, the values can be attributed to any transport mode and possibly to other sectors. More information on the Sustainable Rail Programme's Rail Industry Sustainable Development Principles can be found here http://www.rssb.co.uk/national_programmes/sustainable_rail/sd_industry_strategy.asp

The following are the areas that currently the objectives set out in the Communication seems to not fully address:

Carbon

The Communication does not seem to have an objective that relates specifically to carbon. Reducing carbon emissions alone is of the upmost importance in terms of sustainable transport systems. This in itself is a stand alone objective and it is recommended that this is readdressed and be included in the Communication.

The recent DfT 'Delivering a Sustainable Transport System' consultation identified that one of the biggest challenge that the UK transport network faced is tackling climate change and growth together. The document specifically included the following goal to ensure that the issues were addressed.

> *To reduce transport's emissions of carbon dioxide and other greenhouse gases, with the desired outcome of **tackling climate change.***

We support the UK Government's proposals to include in their response to the Communication reference to the carbon reduction strategy for transport.

Energy

Similarly to carbon, there is little mention in the objectives of energy. Efficient use of energy, renewables and other alternative sources are all integral to the sustainable future of transport. The trends and challenges discuss the increasing scarcity of fossil fuels, but this does not seem to be included as part of the objectives.

Consideration should also be given to the impact of energy choice on future policy flexibility; clearly further electrification has the potential to make the point of use of energy independent (to a large degree) of the fuel source.

Transport and the economy

Transports role in improving the economy is important in terms of stimulating economic growth through increasing productivity and competitiveness. Transport can also aid agglomeration and trigger economic regeneration in areas of need.

The objective *protecting and developing human capital* does include the positive impact on the labour market that transport can have, which is welcomed. However, it doesn't go far enough

to include the economy on the whole.

SPECIFIC OBJECTIVES IN THE CONSULTATION

Quality transport that is safe and secure

The detail of the objective places a strong emphasis on the importance of access and what this offers in terms of benefits to society. This should be reflected in the title of the objective as it currently does not actually match the content.

The role of improving the quality of transport in order to generate modal shift should be recognised – particularly in encouraging people to leave the perceived comfort of their cars. The requisite investment in public transport modes should be recognised.

In addition the policy should also include more on the health aspects that relate to transport.

A well maintained and fully integrated network

Better integration will contribute significantly to the sustainability of the transport network. However, the policy objective could be strengthened to consider the social and economic benefits of better integration and link these back to the challenges posed such as 'migration and internal mobility' and 'urbanisation'.

The integration of high-speed rail and international air transport is identified as a priority, but it should be recognised that the modes are competitive rather than complementary at a domestic scale. Furthermore, policy should seek to encourage integration between modes.

In addition to improving quality of transport to generate mode shift, there also needs to be consideration for necessary investment in sustainable infrastructure. Future investment in rail and other public transport modes is needed to ensure sufficient capacity and to promote modal shift.

Smart prices as traffic signals

Price signals, such as those suggested, should only be adopted if they are done so through a balanced approach which takes into consideration all transport modes. It should also be considered that there is a relative inelasticity of supply in certain modes such as rail and air, where infrastructure investment is often needed to accommodate large shifts in usage. The result is that pricing signals such as congestion charging for road traffic can be ineffective without the necessary advanced investment in public transport options.

Therefore, if such policies are not managed in a balanced way, an unintended consequence could include undesired shifts between modes of transport.

Planning with an eye to transport – improving accessibility

While the location of storage and distribution centres can have an effect on the transport requirements of firms, open access to such facilities is equally important in the rail sector. The development in many countries of policies to open such off-network facilities to potential users will provide greater choice and lead to be a reduction in transport needs, and an opening up of the market.

Infrastructure: maintenance, development and integration of modal networks

It is incorrect to say that optimal functioning of the transport system requires full integration and interoperability. It is likely that adopting interoperable standards will be sustainable in the long-term for many elements of Europe's transport systems: However, there will be areas where the cost of meeting interoperable specifications would reduce the business case for the provision of services. This is recognised through the existence of special cases in TSIs and should be reflected here.

We support the use of cost-benefit analysis for the prioritisation of infrastructure projects, and believe that these should also include environmental costs and other sustainability costs and benefits.

Better use of infrastructure is a short-medium term approach to meeting the capacity demands. If the Commission is serious about a paradigm changing modal-shift from domestic air and motorway to rail and sea, then a long-term strategy must include serious levels of investment in new capacity. To enable this to be done affordably, sufficient resources need to be allocated to research and develop the necessary technologies for this long term agenda.

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

DG Tren should integrate its policy objectives with those of other policy areas, particularly climate change, land planning and trade. More specific integration could be achieved with the Carbon Reduction commitments entered into by the EU, and the role Europe's transport sector could play in growing trade.

The EU should have an understanding of policy objectives from member states to ensure that outcomes are aligned.

The Department for Transport recently consulted on Delivering a Sustainable Transport System (DaSTS) which included that following goals:

- To **support** national **economic** competitiveness and **growth**, by delivering reliable and efficient transport networks
- To reduce transport's emissions of carbon dioxide and other greenhouse gases, with the desired outcome of **tackling climate change**
- To **contribute to better safety security and health** and longer life-expectancy by reducing the risk of death, injury or illness arising from transport and by promoting travel modes that are beneficial to health
- To **promote** greater **equality of opportunity** for all citizens, with the desired outcome of achieving a fairer society;
- To **improve quality of life** for transport users and non-transport users, and to promote a **healthy natural environment**

The EU policy objectives are in a number of ways similar to those devised by DfT. We would recommend that they are considered alongside to ensure that they are aligned.

For more information on DaSTS go to:
http://www.dft.gov.uk/about/strategy/transportstrategy/dasts/

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

Section V- Policy instruments for sustainable transport- page 13-18

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

Some are sensible approaches, such as upgrading of existing infrastructure – although the cost benefit analysis of the disruption caused by conducting major engineering work on in-use infrastructure may change the economics behind any investment decisions when compared to the cost of new build.

Separation of passengers and freight may be a desirable and beneficial activity in some areas with the capacity and capability to entertain separate networks, but the suggestion has limited beneficial use in highly used, mixed-use infrastructures where separation would displace users without suitable options.

The potential to make transport tickets multi-modal may improve integration between some services (mostly turn-up-and-go options such as bus, tram, metro and train) but it is difficult to see how the integration of ticketing services between air and other modes could be managed without significant additional costs to accommodate liabilities from the cost arising from air connections.

- **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.**

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

The EU should be looking to create a **long-term framework** in which European and national planners and funders can map out, with confidence, their strategies for meeting the changing needs of Europe people and businesses.

EU policy development should concentrate on both short-term processes such as the roll-out of multi-annual contracts in the rail sector, and co-ordinating long-term frameworks for member state such as sustainability measures, targets for carbon reductions (the UK has set a 80% reduction target for 2050), and capacity growth targets for transport sectors.

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

The policy instruments could include incentives for adoption of new and existing technologies that contribute to increasing the sustainability of transport. In the rail sector this could include incentives for electrification of Europe's railways.

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

Increasing sustainability (environmental, social, and economic), supporting Europe's economic competitiveness, developing an integrated end-to-end transport system and improving the reliability and efficiency of transport networks.

If you have any other general comment that you would like to make concerning this consultation, please give them here:

We would prefer to have electronic copies of your response so please email this completed form to: EUFutureofTransport @dft.gsi.gov.uk

Alternatively you can post the completed form to:

EC Consultation on "A Sustainable Future for Transport"
Department for Transport
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The deadline for responses is: **Monday 7 September 2009.**