

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

Name	Elizabeth Box
Address	89-91 Pall Mall, London.
Postcode	SW1Y 5HS
email	ebox@racfoundation.co.uk
Company Name or Organisation (if applicable)	Royal Automobile Club Foundation
Please tick one box from the list below that best describes you /your company or organisation.	
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<p>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:</p> <p>The Royal Automobile Club Foundation is a small, independently funded research group. This response has been put together using staff expertise on behalf of the Foundation. The staff respond to and seek advice from the Foundation's Board of Trustees and Public Policy Committee.</p>	
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PART 2 - Your Comments

General

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

Transport policy will face a number of inter-related challenges over the next ten years. The most central of which will be how to maintain mobility in the face of mounting pressures and challenges, principally climate change.

Rising population, increased wealth and a greater desire for travel, as identified in RAC Foundation research (RAC Foundation (2007) "Roads and Reality" and RAC Foundation (2009) "The Car in British Society") are likely to continue into the future and there will be difficult political decisions to make about how to meet these competing demands. Car ownership and use has grown exponentially over the past fifty years, and its use has become embedded across all sections of society. Population increases will put increased pressure on road infrastructure, which needs to be planned for and managed. Congestion is a principle concern today, and this will get significantly worse without appropriate planning and policy developments.

Keeping countries mobile and prosperous in a way reconciled with environment concerns is essential, but road safety also remains an important challenge. Although significant improvements have been made towards reducing death and injury on the roads over the past two to three decades, road deaths are still a significant killer, particularly for young men, and therefore continued efforts will be needed in this regard.

The Foundation is pleased to see that the EU Commission has identified the ageing population as an important influence on future policy. This is a factual demographic trend which must not be ignored. The RAC Foundation would urge the Department and the Commission to read both of the RAC Foundation's publications mentioned above for more detailed information about past trends and future challenges. These can be viewed on the RAC Foundation website at:

<http://www.racfoundation.org/files/Main%20document.pdf> and

[http://www.racfoundation.org/files/The%20Car%20in%20British%20Society%20\(Full%20report\).pdf](http://www.racfoundation.org/files/The%20Car%20in%20British%20Society%20(Full%20report).pdf).

We will also be publishing new material on older drivers in the near future which will be available to download at www.racfoundation.org.

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

Answered in questions 10, 11 and 12

3. What should the Commission's role be?

Answered in questions 10, 11 and 12

Section III- Trends and Challenges – page 6**4. Are the trends and challenges identified in this section the right ones?**

The six trends and challenges identified will no doubt have an influence on future transport policy. The list could usefully include an indication of what influence the prevailing and changing economic climate will have on achieving outcomes, such as green infrastructure developments. Improved road safety should also be identified as a challenge for the future and the increased mobility afforded by the private automobile should be more explicitly mentioned (See: RAC Foundation – The Car in British Society). Keeping the population mobile and able to access key services in light of environmental challenges needs to be confronted by future policy. The car is the main mode of transport used by most people, most the time. This reality needs to be more strongly reflected in the trends identified.

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

Stated in question 4 above.

Section IV- Policy objectives- page 9-12

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

The RAC Foundation agrees that a future transport environment should be safe, secure, good quality and maintained to a high standard. An integrated network is an ideal to which we should aspire, but the limitations of public transport and other modes for meeting the needs of those currently using cars needs to be recognised and addressed. Only 7% of all trips in the UK are currently made by rail, and with capacity limitations, the proportion of the public using rail rather than road based transport is unlikely to change significantly. A realistic projection of what can be achieved needs to be set out.

The RAC Foundation is sceptical about the development of High Speed Rail as an adequate answer to the UK's transport capacity and environmental problems, especially in relation to the costs involved. A much more considered debate about how the finances available could best be used to produce a high quality, safe and sustainable transport system is needed.

Technology developments, whether new vehicle technologies or intelligent transport system applications will play an increasing role in helping resolve both environmental and infrastructure capacity concerns. These approaches need to be pioneered and promoted at the highest level. Creating a competitive European Economy is undoubtedly important going forwards, and the role that the use of transport systems plays in meeting this end should not be disregarded. EU policy should therefore go beyond supporting transport companies and workers. The intricate relationship between transport and the economy needs to be recognised and taken into account. The Eddington Transport Study (2006) provides a good background in this area.

The Commission are correct to suggest that it is important that 'smart prices and traffic signals' are got right. The Foundation believes that existing pricing signals are not appropriate or effective. In the UK motorists are highly taxed, contributing some £45 billion to the Treasury every year, when only £9 billion is reinvested back into the road network.

Costs to road users, either through Fuel duty, VED or VAT are collected to compensate for environmental and other externalities, but they are also used for general revenue raising purposes. With an increasing number of initiatives embracing emissions based charging, motorists are often charged many times over for the carbon they use (See: RAC Foundation and SMMT (2009) Carbon Prices: The right charge for motorists?

<http://www.racfoundation.org/files/Carbon%20Prices%20-%20The%20right%20charge%20for%20motorists.pdf>). Charges need to be transparent and purposeful. If charges are for general revenue raising purposes, this should be clearly stated, in which case there is a question about whether motorists should be the ones bearing the brunt of additional taxation.

Pricing carbon correctly, and implementing policies which take this into account is essential for achieving more sustainable transport decisions. Aligning charges more directly with usage rather than ownership is a key way that this can be achieved, an approach which has been recognised in a recent House of Commons Transport Select Committee report on Taxes and Charges. National forms of road pricing could achieve this end, but only if there was public trust in the system and an independent regulatory body associated with the scheme, which would ensure that charges are reinvested back into the transport infrastructure. A complete RAC Foundation view on the development of pricing signals alongside road development can be viewed at: RAC Foundation (2007) Roads and Reality <http://www.racfoundation.org/files/Main%20document.pdf>.

Transport aids mobility and accessibility. Land use planning needs to take the accessibility of goods and services into account more fully. In tackling climate change it is important that accessibility is maintained, and if it is deemed that mobility itself is to be curtailed, the social and economic consequences of taking this course of action need to be fully evaluated and understood (See: RAC Foundation (2009) "The Car in British Society" for additional information about existing literature associated with costs of adjustment –

[http://www.racfoundation.org/files/The%20Car%20in%20British%20Society%20\(Full%20report\).pdf](http://www.racfoundation.org/files/The%20Car%20in%20British%20Society%20(Full%20report).pdf))

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

See answers to question 6.

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

It is not possible to comment on this, with the current level of detail provided.

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

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

See Answer to question 10.

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.

- *“Intermodal and transshipment platforms should be promoted and developed where there is a potential for consolidation and optimisation of passenger and freight flows. This will typically be in case in areas with a high activity of passengers and freight transport, i.e. urban areas, and where high volume corridors are intersecting”.*

Integration has long been a stated objective, although this has rarely been achieved in practice. Policies which try to meeting this objective need to be realistic. In this regard, focusing on heavily trafficked, urban routes is the right focus.

- *“Infrastructure needs to be carefully planned and prioritised with a view to optimising transport chains and the overall transport network”.*

Road infrastructure needs must be planned for and prioritised. Long term planning along the lines required is not currently achieved in the UK, because there are not adequate strategic planning structures in place (like the High Level Output Specification programme for rail) and there are a number of perceived and incorrect misconceptions about the impact of road development on the environment (See: RAC Foundation (2008) “Misconceptions and Exaggerations about roads” - [http://www.racfoundation.org/files/Background%20Paper%205%20-%20Misconceptions%20and%20exaggerations%20about%20roads%20\(November%2008\).pdf](http://www.racfoundation.org/files/Background%20Paper%205%20-%20Misconceptions%20and%20exaggerations%20about%20roads%20(November%2008).pdf))

- *“Common methodologies and similar assumptions should be adopted in the appraisals of infrastructure projects across modes and possibly countries. Common data and indicators are needed starting by those on traffic and congestion”.*

This is an essential development for more evidence based and comparative policy development. It will also be very helpful for comparative purposes on a country by country basis. The RAC Foundation has recently published a report on “The Rates of Return on Public Spending on Transport” which will provide some useful background in this area – http://www.racfoundation.org/index.php?option=com_content&task=view&id=677&Itemid=31

- *“Upgrading the existing infrastructure – also through intelligent transport systems – is in many cases the cheapest way to enhance the overall performance of the transport system”.*

This maybe the case in some circumstances, but the development of wholly new infrastructure, should not be dismissed. In each circumstance, an appraisal, which takes account of the costs and benefits should be implemented. Future requirements on transport networks should be fully investigated as cheaper, short term infrastructure may instead cause greater problems in the medium to long term.

- *“ICT solutions should be developed as a support for better management and integration of transport flows”.*

Managing capacity on existing networks through the implementation of ICT solutions has proved particularly successful on selected motorway and trunk route networks in the UK, through a Managed Motorway Programme. It should however be recognised that such approaches have significant running costs, that require political commitment for ongoing success. These approaches should also not be considered a substitute for additional capacity where required. Simply extending capacity on existing infrastructure by hard shoulder running or motorway widening can put additional pressure on junctions. See RAC Foundation (2008) “What Pattern of Motorway is needed” [http://www.racfoundation.org/files/Background%20Paper%206%20-%20What%20Pattern%20of%20Motorway%20Network%20is%20needed%20\(December%2008\).pdf](http://www.racfoundation.org/files/Background%20Paper%206%20-%20What%20Pattern%20of%20Motorway%20Network%20is%20needed%20(December%2008).pdf) for a more in depth analysis of the limitations of taking a purely managed network approach.

- *“The development of technology – for example on-board units and global positioning systems for tolling – will facilitate the future implementation of this strategy”.*

Technology will undoubtedly have an important role to play in facilitating the future implementation of any road user charging strategy, but the type of system that will be used (e.g. GPS) should not be prescriptive at this stage. RAC Foundation views about the problems and opportunities for funding transport developments are already set out in response to question 6.

The RAC Foundation does not necessarily agree with all other policy instruments suggested in the report, but did not see fit to make comments on their value at this stage.

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

The EU has an important facilitative and enabling role to play. Providing consistency to analysis and facilitating the sharing of best practice between members is important, alongside developing an appropriate legislative framework.

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

Views already provided in question 10 above. It is difficult to provide a more definitive answer to the policy instruments which should be included, without the high level strategy being set.

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

No further comments at this stage.

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

Significant policy work is ongoing in the UK, which the EU would benefit drawing upon to develop the policy framework at the EU level.

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
1/31 Great Minster House
76 Marsham Street
London SW1P 4DR**

The deadline for responses is: **Monday 7 September 2009.**