

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	Mr John Jarvis, Transport Director, The Northern Way
Address	Yorkshire Forward Victoria House 2 Victoria Place Leeds
Postcode	LS11 5AE
email	John.Jarvis@Yorkshire-Forward.com
Company Name or Organisation (if applicable)	The Northern Way
Please tick one box from the list below that best describes you /your company or organisation.	
<input type="checkbox"/>	Small to Medium Enterprise (up to 50 employees)
<input type="checkbox"/>	Large Company
<input type="checkbox"/>	Representative Organisation
<input type="checkbox"/>	Trade Union
<input type="checkbox"/>	Interest Group
<input type="checkbox"/>	Local Government
<input type="checkbox"/>	Central Government
<input type="checkbox"/>	Police
<input type="checkbox"/>	Member of the public
x	Other (please describe): The Northern Way is a unique initiative, bringing together the cities and regions of the North of England to work together to improve the sustainable economic development of the North towards the level of more prosperous regions. Formed as a partnership between the three Regional Development Agencies (North West Development Agency, One North East and Yorkshire Forward), we also work with local authorities, universities, the private sector and other partners to secure a strong coalition in support of this goal. We aim to influence policy and delivery at a local, city region, regional and national level, to join up thinking and encourage collaboration.

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:

The views and comments expressed reflect the policy positions adopted by the Northern Way through the Northern Transport Compact and the Northern Way Steering Group and in particular the Northern Way's Strategic Direction for Transport and Short, Medium and Long Term Transport Priorities.

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

PART 2 - Your Comments

General

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

The Northern Way's transport focus is promoting economic growth while at the same time seeking to minimise the impact of transport on the North's environment. We consider tackling economic competitiveness and growth as well as climate change to be the central challenge for transport at the regional, national and EU level.

The Northern Way has also identified that the North's distinct Quality of Life is a major asset to the North and underpins its future economic prospects. Consequently, there is recognition that North's future transport networks should also protect and enhance the Quality of Life in the North.

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

The Commission has presented a comprehensive list of policy options. We do not have detailed comments on these policy options in themselves. They represent a reasonable range of the types of policy options that could be considered in support of a better transport system.

However, we believe the critical aspect missing from the EC communication is a clear articulation of what the objectives are for transport, how the identified challenges impinge on the attainment of these objectives and how the policy options overcome the identified challenges.

As we have set out in our response to Question 1, from the Northern Way's perspective the most pressing transport goal is to achieve balanced economic growth while at the same time promoting a low carbon economy. The challenges are then what impinges on attaining this goal. The broad terms policy options set out in the Commission document all look reasonable for consideration, but it is difficult to judge their relative merits without this logic chain.

3. What should the Commission's role be?

The Commission's role should be to act in such a way that supra-national activity adds value over and above what the Member States can achieve acting in isolation.

We therefore see the key role of the Commission being:

- Supporting technological innovation to support low-carbon transport, through the development of EU-wide regulatory standards and through the sponsorship and coordination of research, for example in the fields of vehicle and fuel technology.
- Supporting technological innovation to reduce transport costs, for example through developing regulatory standards and through the sponsorship and coordination of research in the Intelligent Transport Systems area.
- Working to remove technological and regulatory barriers to cross-border movement
- Extension of scope and scale of Emission Trading Schemes in the transport sector within the EU
- Promotion and promulgation of European best-practice in land-use and transport policy and planning, and in transport operation.
- Leading negotiations with other supra-national bodies and states to reduce further regulatory barriers to cross-border movement and to promote lower carbon intensive transport
- Providing Structural Funds to support infrastructure, such as the European Regional Development Fund for investment in Trans-European Transport Network (TEN-T) projects

Section III- Trends and Challenges – page 6

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

The trends and challenges are all relevant, but we believe these should be articulated in a way that enables a better understanding of the role transport can play in addressing these challenges.

For example trends towards 'ageing' and 'increased net migration' are trends that are not affected by transport, but where the resulting change in population / demography has implications for transport in terms of direct impacts on travel demand / needs and indirect impacts on public expenditure in general and by extension for transport funding. This is therefore an area that transport must plan for, but the trends themselves cannot be influenced by transport.

By contrast, the need to address the 'environmental impact of transport' and the expectation that emissions will increase significantly are challenges that should be at the heart of transport policy, and where transport can and should be pro-active in addressing and meeting this challenge.

There is also little acknowledgement of the positive linkages between transport and the trends towards 'urbanisation' and 'globalisation', where the role of transport in supporting the growth of cities and trade are key to ensuring the future growth and prosperity of Europe.

Finally, we regard the omission from the challenges of the need for transport to support economic growth, as well as support a more equitable distribution of growth between better and not so well performing regions as a very significant omission.

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

As we note in our response to question 4, we regard the omission from the challenges of the need for transport to support economic growth, as well as support a more equitable distribution of growth between better and not so well performing regions as a very significant omission.

Section IV- Policy objectives- page 9-12

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

The range of policy objectives identified by the Commission is broad and extensive so together they encompass what is probably the full range of potential policy objectives. However, we return to our central point that it is not clear from the Commission's document what the rationale for this set of policy objectives is, in particular how each policy objective will help meet the identified challenges. From the Northern Way's perspective, we would wish to see an assessment of how these policy objectives link to our goal of supporting low-carbon economic growth.

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

The Northern Way would like to see a policy objective related to our central goal of promoting the rate of economic growth and the more equitable distribution of that growth.

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

As the Commission's document gives no indication of the timescales for the delivery of the operational goals or the resources that are required it is difficult to answer this question in an informed way.

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?

The Commission has identified a broad range of policy instruments, some of which will have a direct impact on transport supply and its use, others of which will have an indirect impact. However, there is no assessment of potential effectiveness and no prioritisation, so it is difficult to answer this question directly.

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.

Please see our response to Question 9.

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

Please see our response to Question 3.

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

There are no specific additional policy instruments that we would suggest.

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

Please see our response to Question 3.

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

The Commission's document and the Department for Transport's précis of it, and the consultation questions posed by the Department would all benefit from greater clarity. All have terms used without definition. The Commission document would have benefitted from a description of the process by which its propositions were developed and their rationale.

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.**