

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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Company Name or Organisation (if applicable)	Environmental Protection UK
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
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<input type="checkbox"/>	Police
<input type="checkbox"/>	Member of the public
<input type="checkbox"/>	Other (please describe): Non Governmental Organisation
<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>Environmental Protection UK brings together organisations from across the public, private and voluntary sectors to promote a balanced and innovative approach to understanding and solving environmental problems, through policy development and education. We are a registered charity with 110 years experience of environmental campaigning, public information provision, producing educational resources and policy formulation.</p> <p>Environmental Protection UK's air quality policy committee has been involved in the development of this response. The committee bring together policy makers, regulators and practitioners from local authorities, consultants, developers, academics, industry, interested NGOs as well as</p>	

members from Environmental Protection UK's regional divisions.

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?

In the next 10 years we consider the greatest challenge facing transport will be to improve its environmental performance. Immediate challenges include the need to meet air quality limit values and noise obligations. It is worth noting that whilst the statement in paragraph 26 ('PM₁₀, of which transport is the second most important source') of the EU communication is technically correct for total emissions, in terms of human exposure transport is by far the most important source of PM₁₀, as, unlike emissions from most large point sources, emissions from vehicles take place in the urban environments where most of us live and work. Going forward, de-carbonising transport will also present a huge challenge that we need to start addressing now. However, we also need to ensure that action to reduce carbon emissions does not negatively effect other areas of the environment, instead prioritising win/ win measures that deliver benefits for both climate change and other environmental areas such as air quality and noise.

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

In addition to those policy options proposed in the EU Communication, we believe that more needs to be done to decouple transport growth from GDP, and link transport in with wider policy agendas. The EU Communication states that transport accounts for 7% of EU GDP, however it is important to acknowledge that for the vast majority of users transport is a mechanism rather than the end goal in itself. In general then, transport is an enabler of economic growth, rather than the source of growth in itself. With this in mind transport needs to be put into an appropriate context, and the focus needs to be placed on facilitating the process rather than simply continuing with current mechanisms. For example what is the scope for improved telecommunications to displace passenger journeys to business meetings?

This is important, as whilst technical measures exist, or are being developed, that can help address the environmental impact of individual vehicles, increases in the total demand for transport may simply erode these savings. The EU communication acknowledges this in paragraph 16, where decoupling GDP and transport growth is discussed. However, beyond this no mention is made of mechanisms to achieve this goal.

3. What should the Commission's role be?

The Commission has a key role in co-ordinating European level action, ensuring a level playing field across Europe (via standard setting and legislation) and facilitating trans-European transport links via planning and funding mechanisms.

Section III- Trends and Challenges – page 6

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

Yes

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

Whilst the communication makes strong considerations of 'traditional' trends that impact transport, it does not look at wider technological and social trends that may impact on the transport sector on a 50-year timescale. It is important that that the White Paper takes these wider issues into account to ensure that transport is not placed in a 'policy bubble'.

Whilst making predictions of future trends is fraught with uncertainty, we can seek to extrapolate some current trends, for example:

- The fast pace of improvement in teleconferencing/ telepresence systems is very likely to continue, and make some inroads into the business travel market.
- Continued migration between European member states is likely to increase demand for long distance passenger transport due to an increasing number of long distance social relationships (i.e. visits to family and friends in other member states)

A greater depth of research into social and economic trends such as these could help to inform the longer term planning within the White Paper.

Section IV- Policy objectives- page 9-12

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

Yes. It is encouraging to see the Commission acknowledge the need to take into account a broad view of sustainability (paragraph 49), rather than simply focus down on narrow metrics such as CO₂ emissions.

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

There are no policy objectives to achieve modal shift to more sustainable forms of transport, or to reduce the need to travel. In the latter case the White Paper should make strong links with spatial planning and information technology policy. In the former case more attention is needed as to how trans European passenger journeys can be shifted from air to more sustainable modes such as high speed rail, which would bring considerable CO₂, air quality and noise benefits. An example of where this has been achieved is the cross channel Eurostar service, which in 2007 achieved a market share of 71% of the London-Paris route and 65% for London-Brussels, displacing a very large number of journeys by air. In addition to passenger journeys, more attention is also needed on shifting long distance freight transportation from road to rail.

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

Yes

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?

Yes

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 note that we refer to the paragraph numbers of the EU communication below:

65 – Common assessment methodologies – we strongly welcome common assessment methodologies for transport infrastructure projects. Where environmental impacts are assessed it is essential that a broad range of impacts are taken into account (e.g. air quality noise, biodiversity, climate change, etc) rather than narrow metrics only, such as CO₂ emissions. Assessment should also examine the resilience of the proposed infrastructure to a changing climate, as some degree of climate change is now inevitable.

68 – Maritime Sector – It is essential that the air quality impacts of a large expansion in European shipping are understood and managed. Shipping is currently a major source of PM₁₀, SO_x and NO_x (as well as CO₂) and emissions from trans-national shipping have, until recently, been largely unmanaged. Following the agreement reached by the Marine Environment Protection Committee (MEPC) of the International Maritime Organization (IMO) last year the Commission should move as soon as possible to ensure Emission Control Areas are extended to all relevant European sea areas.

84 – Education, Information and Awareness – Public awareness campaigns need to include information/ advise on modal shifts and reducing the need for travel. Whilst much of this kind of information realistically needs to be delivered at a national or local level, the EU can help facilitate the spread of best practise, and work at the trans-national level on issues such as modal shift between aviation and high-speed rail.

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

The EU has a strong role in co-ordinating action, setting standards to ensure a level playing field between member states, provision of guidance, and provision of funding for trans-European routes and research & development.

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

N/a

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

N/a

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

For reference in future consultations, the consultation document provided here (by DfT) feels a little rushed. As the actual EU communication is quite short it may have been better to simply preface the EU document rather than have summarised it.

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.**