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Dear EC Consultation team

Department for Transport Consultation on "A Sustainable Future for Transport: Towards an Integrated, Technology-led and User Friendly System"

Please find attached Natural England's response to this consultation.

If you would like to discuss our response in more detail, please contact Rebecca Smith (Specialist, Transport Policy) at rebecca.l.smith@naturalengland.org.uk.

Yours faithfully

Caroline Cotterell
Acting Director Policy

cc. European Commission tren-future-of-transport@ec.europa.eu

Natural England's response to the Department for Transport's Consultation on "A Sustainable Future for Transport: Towards an Integrated, Technology-led and User Friendly System", September 2009

Introduction

1. Natural England has been charged with the responsibility to ensure that England's unique natural environment, including its flora and fauna, land and seascapes, geology and soils are protected and improved. Natural England's purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.
2. We want to see an environmentally sustainable transport system – one that protects and enhances the natural environment, as well as delivering economic and social benefits. Transport affects the natural environment, and people's experience of it, in three key areas:
 - **Biodiversity, landscape, geodiversity** – through direct and indirect impacts from land take and traffic;
 - **Climate change and energy** – through greenhouse gas emissions and the environmental challenges posed by biofuels; and
 - **Quality of life** – through people's access to and experience of the natural environment, and through links between walking, cycling, health and well-being.
3. Natural England seeks more positive outcomes for these three areas, with the aim of securing the future of England's natural environment in a society that faces a fundamental challenge - to 'square' our desire for greater mobility with the urgent need to reduce our carbon emissions. Natural England advocates the protection and enhancement of the natural environment in transport planning and policy-making and in decisions about the way our lifestyles and economy are developed.

Summary of Natural England's comments

4. Natural England welcomes the opportunity to respond to the Department's consultation, and therefore help inform the UK position, on the European Commission's (EC) Transport Communication.
5. We welcome the Communication acknowledging that there is currently limited progress against the transport goals in the European Union (EU) Sustainable Development Strategy and that the environment is the area of European transport policy that needs the most improvement. European transport policy should aim to deliver net environmental gains and, in so doing, ensure that the delivery of economic and societal benefits is not at the expense of the natural environment. It should protect and enhance the natural environment and ensure the highest levels of protection for its protected landscapes, habitats, sites and species.
6. We challenge the view that European transport policy should aim to ensure that mobility available to people and businesses can be sustained in the future. We believe that a fundamental cultural shift in the way society views mobility is urgently needed, in order to address the challenge of climate change, protect the natural environment from further damage, and build sustainable communities. The Commission needs to find ways to achieve the economic and social benefits that good accessibility delivers without ever-increasing levels of mobility.
7. We broadly agree with the range of challenges and trends and welcome recognition of the growing '*urgency for the transport sector to mitigate its negative impact on the environment*', although the aim should be to avoid not just minimise impacts. There are only brief references to climate change, greenhouse gas emissions, biodiversity and landscape – we wish to see more consideration of these issues.
8. We broadly support the policy objectives outlined in the Communication. In order to achieve these objectives a combination of measures is required including fiscal incentives, regulation, 'soft'

measures, spatial planning and technology. Our more detailed comments on the objectives are outlined in paragraphs 14-20. However, we:

- support the UK government's concern that the Communication does not indicate any real priority or direction at this stage; and believe that
- a key objective in the development of European transport policy should be a move to an environmentally sustainable, low carbon transport system, one that encourages the use of more carbon-efficient and active modes of travel. Policies and investment need to focus on managing demand and prioritising environmentally sustainable, low carbon modes and technologies.

9. Our more detailed comments are set out below.

Detailed Comments

10. Natural England welcomes the Commission acknowledging that:

- there is currently limited progress against the transport goals in the EU Sustainable Development Strategy; and
- that the environment is the main area of EU transport policy that needs the most improvement and that it is identified as one of six themes that will be critical in shaping future EU transport policy.

European transport trends show continued growth in demand for both freight and passenger transport, with considerable increase in demand for road and air transport. The Commission forecasts that these trends will continue. We believe that these trends cannot be sustained without damaging the natural environment and people's quality of life, as they contribute to rising greenhouse gas emissions, poorer physical health, and a more fragmented and polluted natural environment. Future European transport policy needs to aim to deliver net environmental gains and, in so doing, ensure that the delivery of economic and societal benefits is not at the expense of the natural environment.

11. Natural England challenges the Commission's view that transport policy should aim to ensure that mobility available to people and businesses can be sustained in the future. The transport trends highlighted above cannot be sustained if we are to meet carbon reduction targets and deliver sustainable development. A new paradigm is required, both for transport planning and provision and for sustainable economic growth. This requires an urgent and fundamental cultural shift in the way society views mobility. To address the challenge of climate change, protect the natural environment from further damage, and build sustainable communities, the Commission needs to find ways to achieve the economic and social benefits that good accessibility delivers without ever-increasing levels of mobility. Managing personal and business transport demands will need to be part of this approach.

Challenges and trends

12. Natural England broadly agrees with the range of challenges and trends outlined in the Communication. We welcome recognition of the growing '*urgency for the transport sector to mitigate its negative impact on the environment*', although the aim should be to avoid (not just minimise) impacts on the environment, through full and proper appraisal and careful design, for example.
13. The Communication only makes brief reference to climate change, greenhouse gas emissions, biodiversity and landscape. We wish to see more consideration of these issues, as future European transport policy needs to be developed on the basis of clear evidence and data (e.g. on impacts, good practice etc.), including environmental. The use of evidence should lead to better informed decisions and a more sustainable transport strategy.

Policy objectives and measures

14. Natural England broadly agrees with the headline policy objectives outlined in the Communication.

Our views on what each policy objective should seek to achieve are outlined below. In order to achieve these policy objectives a combination of measures is required, including fiscal incentives, regulation, 'soft' measures, spatial planning and technology:

15. **'Quality transport that is safe and secure'** – emphasis should be on improving the quality rather than the quantity of our transport networks, so that travel by environmentally sustainable modes (such as public transport, walking and cycling) is convenient, affordable and enjoyable.
16. **'A well maintained and fully integrated network'** – we believe that the focus should be on better management and integration of the existing network and the need to ensure high quality public transport services, rather than on expansion.
17. **'More environmentally sustainable transport'** – Natural England strongly supports this objective. There is a need to move towards an environmentally sustainable transport system that operates without causing further damage to the natural environment. This will require changes to the way transport, development and the economy interact. For example, improving the environmental sustainability of freight. Environmentally sustainable freight initiatives include smaller ports enabling a coastal "ring-road" that makes best use of carbon-efficient transport, more freight moved by rail and by sail powered shipping, and a move away from 'just in time' delivery to a more fuel efficient logistics system. However:
 - the Communication only mentions climate change in passing. Compared to 1990 levels, in no other sector has the growth rate of European greenhouse gas emissions been as high as in transport. This increase has occurred even though there have been general improvements in the energy efficiency of fleets and therefore reflects increased transport volume (European Environment Agency, 2009¹). If transport is to reduce its carbon emissions these trends need to change. We therefore support the UK government view that a key objective in the development of EU transport policy should be a move to an environmentally sustainable, low carbon transport system. Policies and investment need to focus on managing demand and prioritising environmentally sustainable, low carbon modes and technologies to encourage a shift to slower, more carbon-efficient and active modes of travel. Natural England recognises that a mix of approaches to decarbonising transport is required, but advocates that priority should be given to those that can be shown to deliver the best carbon savings and have a positive or neutral impact on the natural environment.

In addition, there is a need for an integrated approach to climate change, which addresses both mitigation and adaptation. There is a need for policies that reduce carbon emissions but also policies that address adaptation and recognise the opportunities the transport network has to assist the natural environment in adapting to climate change. Sound design principles for new transport infrastructure and innovative management of the existing transport network could achieve multiple benefits both for the natural environment and network resilience.
 - the Communication only mentions biodiversity and landscape in passing. The Commission needs to consider addressing these issues, and geodiversity and soils, in more detail. Further expansion of our current transport network will inevitably damage our natural environment through land-take, habitat loss and severance, and the impacts caused by traffic. We need to move to an environmentally sustainable transport system that can operate without causing further damage to the natural environment. Future European transport policy needs to protect and enhance the natural environment and ensure the highest levels of protection for its protected landscapes, habitats, sites and species.
18. **'Keeping EU at forefront of transport services and technology'** - the Communication places significant emphasis on the use of technology. Whilst we generally support the use of technology (as part of a package of measures), technological solutions cannot deliver significant reductions in carbon dioxide from transport if we continue to travel further and by more energy intensive modes –

¹ European Environment Agency 2009 Transport at a crossroads, TERM 2008: indicators tracking transport and environment in the European Union.

behaviour change is also required. Measures that manage demand, facilitate behavioural change and modal shift are therefore also essential if we are to significantly reduce carbon emissions.

- whilst the Commission recognises that fuel scarcity is a key challenge there is no reference to how they might deal with this. The Commission needs to consider how it might address this challenge. It needs to link to the work already undertaken in the Fuel Quality and Renewable Energy Directives to reduce emissions (although Natural England does not support a 10% target for renewable fuels due to uncertainty surrounding the sustainability of biofuels). The Commission also needs to encourage the development of alternative low carbon transport fuels (such as biogas, syngas and electricity).

19. **'Smart prices as traffic signals'** – Natural England supports the pricing of externalities to encourage transport users to make the 'right choice'. We believe that all types of transport should cover the full costs of the damage they incur on the natural environment and of their emissions. It is important that the 'polluter pays' principle is used effectively to ensure that the environmental 'externalities' of the transport sector are 'internalised'. This will ensure that transport pays the full costs of the damage it causes to the natural environment, and rewards modal shift to more environmentally sustainable modes. The revenue raised should be used for the provision of more sustainable transport alternatives, to ensure that transport becomes more environmentally sustainable.
20. **'Improved accessibility through integration of spatial planning and transport'** – Natural England supports a move towards more effective integration of spatial planning and transport. The planning system needs to take full account of the potential consequences of development for transport so that new settlements and developments enable low car dependency and reduce the need to travel. The new settlement of Vauban in Frieberg, Germany, for example, has been designed to provide residents with good access to services without them needing to drive, 40% of the households do not own a car. Improved accessibility by environmentally sustainable, active modes (such as walking, cycling and public transport) can deliver a range of benefits for people, the environment and economy, and contribute to the development of sustainable communities.

It is also important to recognise that other policy sectors can have an important influence on the development of the transport sector. The EC needs to consider how it can ensure that the policy frameworks of these sectors reflect their impact on transport and the natural environment.