

## 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)	
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 checked="" type="checkbox"/>	Member of the public
<input type="checkbox"/>	Other (please describe):
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:	
If you would like your response or personal details to be treated <b>confidentially</b> 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?

Please no “technology-led” title to the White Paper

It would be useful to know what was achieved with the last set of policies under each of the challenges and how much this was attributable to EU action.

It is curious that the car industry is not mentioned in the draft – it cannot be ignored.

Freight is also comparatively lightly treated by comparison with personal mobility.

Otherwise, the list of challenges presented in the document is broadly in line with what we would consider the main challenges facing transport

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

Again the White Paper covers many useful areas, however there are some missing aspects:

- There should be a greater focus on urban challenges as these are the areas where transport issues are most pressing and focussed policy is most required.
- It would be good to see some specific carbon and energy efficiency targets. Also more specific suggestions for more efficient use of existing resources.
- There should be more focus on equity and social inclusion issues, perhaps as part of sections 4.5 or 4.7. Section 4.5 in particular needs further development.
- Infrastructure and planning systems which embeds low carbon environmentally sustainable transport, in particular walking and cycling.

### 3. What should the Commission’s role be?

The document needs to separate more clearly what the Commission feel they should deliver directly and what they will facilitate.

The document underplays the Commission’s role as a broker of change – more information on, for example, how the Commission will coordinate targets would be good.

Needs more on evaluation – how will the Commission determine if its actions have made a difference? What kinds of metrics will be used to measure success?

## Section III- Trends and Challenges – page 6

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

The trends identified are clearly very strong pressures on the system.

Ageing is seen in quite a negative light – it could also be seen that positive transport interventions can help to maintain independent living for longer away from the care and health systems – thus reducing the net burdens on the public purse.

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

As a trend/challenge it is important to provide a perspective on economic growth and the differential growth across the EU. There will clearly be a different emergent set of pressures according to start-points and growth rates.

The lack of analysis of major flows and major constraints was a weakness (although clearly it is not the role of the document to specify the solution).

Global security issues might also be considered – particularly given the strong potential role of the EU in this arena.

## Section IV- Policy objectives- page 9-12

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

This section would be clearer if it were to be organised around top-level policy objectives (Safety, Security, Improved Environment, Accessibility) and then there were some second tier or “supporting objectives” which underpinned the principles by which these top level objectives would be achieved.

So, for example, at the moment “Prices” are at the same level as “Tackling Climate Change”. In reality prices are but one means by which you might approach tackling climate change (and other challenges).

It would therefore be clearer to have something along the lines of:

- Transport that is safe and secure
- An improved environment
- Supporting the economy
- Improving accessibility and equity

This would be supported by policies which support:

- Developing a well maintained and integrated multi-modal network
- Setting prices to encourage choices which minimise externalities
- Exploiting technological expertise and excellence where appropriate
- Protecting the rights and working conditions of transport workers

(4.1) The section on safety and security is muddled. It brings together ageing, access to goods, passenger rights and remote region accessibility. The coverage of disability rights seemed to be in the wrong place – better to cover this under an objective of equity or a separate supporting policy of “equality of access”.

(4.2) There probably is no prospect of network “optimisation” so perhaps a different term would be helpful.

(4.3) Adopts the narrow environmental definition of sustainability but claims to include “all elements”

(4.6) It is wrong to suggest that there are no incentives to use safer and more environmentally friendly modes of transport – they may not always be present but in many circumstances they are.

There is also a strange mix of policies and objectives within the sections – e.g. para 61 is all about solutions – worked through to an odd level of detail if this is a top level objective

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

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

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**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?**

It should be recognised that there needs to be a step-change in the provision of infrastructure to supply and operate Electric Vehicles. Electric Utilities need to be established as Sustainable Transport sector stakeholders.

Fiscal policies and support should be put in place to speed up the development of Electric Vehicle technology and production at an International level.

This needs to be developed in partnership with establishing Intelligent electric grids and Electric Vehicle charging points. Intelligent electric grids charging Electric Vehicle offers considerable potential to provide and store energy with a small CO<sub>2</sub> emission penalty.

Although Intelligent Transport Systems, in their many guises can provide modest gains in network efficiency and operation, the up-take of Electric Vehicles offers the greatest potential in making the transport sector sustainable.

Motor manufacturers have to balance fuel efficiency savings with engine management strategies and exhaust after-treatment technologies to control the emissions of pollutants known to have an impact at the local level, which often have a CO<sub>2</sub> emission penalty (e.g.

particle traps). Greater dialogue with motor manufacturers, would help identify where CO<sub>2</sub> emission savings could be made in the short-term.

It is debateable whether the policy of 'identifying green corridors in order to reduce congestion and environmental pollution' will be effective. It is likely traffic demand and older vehicles would re-route to other corridors, simply moving the environmental pollution burden to other areas.

To-date, most of the available transport sector emission assessment has tended to focus on road traffic. There is therefore an obvious bias in the range and sophistication of methods for this sector in comparison to rail, aviation and water-way and sea vessels. It is recognised that International frameworks are however developing the evidence base for these other sectors.

**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.**

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

Developing a framework of minimum acceptable standards

Promoting agreement on the direction of change and ambitions for change (e.g. safety, carbon targets)

Explaining how its own investment and regulatory decisions help to achieve the goals (e.g. how does TEN investment really promote more sustainable travel patterns)

Supporting the exchange of knowledge between urban governments (even though it does not have a direct role in managing urban travel).

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

We would suggest restraining the number of policy instruments to just those that the EU wishes to prescribe/fund or which they believe they have EU agreement on – the process should be about individual countries selecting the right solutions for themselves given the overarching aims/framework.

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

**developing?**

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](mailto: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.**

## Code of Practice on Consultation

The Government has adopted a Code of Practice on consultations. The Code sets out the approach Government will take to running a formal, written public consultation exercise. While most UK Departments and Agencies have adopted the Code, it does not have legal force, and cannot prevail over statutory or other mandatory external requirements (e.g. under European Community Law).

The Code contains seven criteria. They should be reproduced in all consultation documents. Deviation from the code will at times be unavoidable, but the Government aims to explain the reasons for deviations and what measures will be used to make the exercise as effective as possible in the circumstances.

## The Seven Consultation Criteria

1. **When to consult:** Formal consultation should take place at a stage when there is scope to influence the policy outcome.
2. **Duration of consultation exercises:** Consultations should normally last for at least 12 weeks with consideration given to longer timescales where feasible and sensible.
3. **Clarity of scope and impact:** Consultation documents should be clear about the consultation process, what is being proposed, the scope to influence and the expected costs and benefits of the proposals.
4. **Accessibility of consultation exercises:** Consultation exercises should be designed to be accessible to, and clearly targeted at, those people the exercise is intended to reach.
5. **The burden of consultation:** Keeping the burden of consultation to a minimum is essential if consultations are to be effective and if consultees' buy-in to the process is to be obtained.
6. **Responsiveness of consultation exercises:** Consultation responses should be analysed carefully and clear feedback should be provided to participants following the consultation.
7. **Capacity to consult:** Officials running consultations should seek guidance in how to run an effective consultation exercise and share what they have learned from the experience.

A full version of the code of practice is available on the Better Regulation Executive web-site at: <http://www.berr.gov.uk/files/file47158.pdf>. If you consider that this consultation does not comply with the criteria or have comments about the **consultation process** please contact:

Lec Napal  
Consultation Co-ordinator  
Department for Transport  
Zone 1/33 Great Minster House  
76 Marsham Street  
London, SW1P 4DR  
*email:* [consultation@dft.gsi.gov.uk](mailto:consultation@dft.gsi.gov.uk)

### List of those consulted

#### A

ACPO

Advantage West Midlands

Age Concern

Air Transport Users Council

Airport Operator Association

Airports Council International – Europe

Albertis

Alliance Boots

APB Connect

Arriva Plc

Arthritis Care

Associated British Ports

Association for Commuter Transport

Association of British Insurers

Association of Transport Coordinating Officers

Atkins Global

ATOC

Automobile Association

Aviation Environment Federation (AEF)

#### B

BAA Heathrow

BAA plc

Bicycle Association of Great Britain

Biffa Waste

Big 5 Bus Group

Bill Wylie, chairman of the Transport Planning Society

Birmingham International Airport

BMI

Board of Airline Representatives

BRAKE

Bristol Port

British Air Transport Association

British Airline Pilots' association

British Airways

British Business and General Aviation

British Chambers of Commerce

British International Freight Association

British Motorcyclist Federation

British Parking Association

British Ports Association

British Transport Police

British Waterways

Bulmers

#### C

Campaign for Better Transport

Campaign to Protect Rural England

CAP Trust

Carbon Trust

CBI

Chamber of Shipping

Charter Airline Group of the UK

Child Accident Prevention Trust  
Civil Aviation Authority  
Clydeport Operations Ltd  
CMA-CGM  
Commission for Climate Change  
Commission for Integrated Transport  
Community Transport Association UK  
Confederation of Passenger Transport  
Conservative Party  
Council for National Parks  
County Surveyors ' Society  
Cross-London Rail Links Ltd

CTC

Cycling England

## **D**

Dairy UK

Denby Transport

Department for Business, Innovation  
and Skills

Department for Children, Schools and  
Families

Department for Communities and  
Local Government

Department of Energy and Climate  
Change

Department for Environment, Food  
and Rural Affairs (DEFRA)

Department of Health

Derek Holden Consultancy

Deutsche Bahn Regio AG

DHL

Direct Rail Services Ltd

Disabled Persons Transport Advisory  
Committee

Dover Harbour Board

DP World

Drax Power

Driving Instructors' Group

## **E**

East Midlands Regional Assembly

East Midlands Regional Development  
Agency

East of England Regional Assembly

East of England Regional  
Development Agency

Easyjet

Eddie Stobart Ltd

Edinburgh Chamber of Commerce

Energy Saving Trust

English Heritage

English Welsh & Scottish Railway

Enterprise Privacy Group

Environment Agency

Environmental Protection UK

Eon

Eurocontrol

European Low Fares Airline  
Association

Eurostar

Eurotunnel PLC

## **F**

Federation of Small Businesses

Felixstowe

Ferrovial  
First Group Plc  
Fleet Safety Association  
Ford Motor Company  
Fortec Pallet Distribution Network  
Forum for the Future  
Freight Transport Association  
Freightliner Group Limited  
Friends of the Earth

## **G**

GB Rf  
Glasgow Chamber of Commerce  
Go-Ahead Group Plc  
Greater London Authority  
Greater Manchester Passenger  
Transport Executive  
Green Alliance  
Greenpeace UK

## **H**

Hanson Aggregates  
Helios Properties  
Help the Aged  
HM Treasury

## **I**

Infratil  
International Air Transport Association  
Institute of Chartered Shipbrokers  
Institute of Mechanical Engineers  
Institute of Transport Safety  
Institution of Civil Engineers

Institution of Highways and  
Transportation  
International Civil Aviation  
Organisation  
International Maritime Organisation

## **J**

John Laing plc  
JST Services

## **K**

Kuehne + Nagel

## **L**

Lafarge Aggregates  
Lafarge Cement  
LARSOA  
LCP Consulting Ltd  
LCR  
Liberal Democrat Party  
Living Streets  
Local Government Association  
London Brick Company  
London Councils  
London Development Agency  
London First  
London Organising Committee for the  
Olympic Games  
London Travelwatch  
London Underground Ltd  
Low Carbon Vehicle Partnerships  
Luton Airport

## **M**

Maersk line

Major Ports Group  
Manchester Airport Group  
Marks & Spencers  
Mediterranean Shipping Company UK  
Mediterranean Shipping Company  
Merseydocks  
Merseytravel Passenger Transport Executive  
Milford Haven Port Authority  
Mobilise  
Motor cycle Industry Association Ltd

## **N**

National Express Group Plc  
National Farmers Union  
National Trust  
NATS  
Natural England  
Ned Railways  
Network Rail  
Nissan Motor Manufacturing UK Ltd  
Norbert Dentressangle ( UK and Belgium)  
North East Assembly  
North East Regional Assembly  
North West Regional Assembly  
North West Regional Assembly  
Regional Transport Group  
North West Regional Development Agency  
Northern Ireland Aviation Lead  
Northern Ireland Department for Regional Development

Northern Ireland Executive  
Northern Rail Ltd  
Northern Transport Compact  
Northern Way

## **O**

Olympic Delivery Authority  
One North East  
Office of the Rail Regulator

## **P**

Parliamentary Advisory Council for Transport Safety  
Passenger Focus  
Passenger Shipping Association  
Passenger Transport Executive Group  
PD Ports - Teesport  
Peel Airports  
Police Federation of England and Wales  
Port of Dover  
Port of Tyne

## **R**

RAC Foundation  
RAC Motoring Services  
Radar  
Rail Freight Group  
Rail Freight Interchange Investment Group  
Rail Safety and Standards Board  
Railway Forum  
Railway Industry Association  
Regional Development Agency

Retail Motor Industry Federation  
Road Haulage Association  
Road Peace  
Roadsafe  
Roy Bowles Transport  
Royal Commission on Environmental  
Pollution  
Royal Society for the Protection of  
Birds  
**S**  
Sainsbury's  
Scottish Coal  
Scottish Executive  
Serco Group plc  
Shell  
Society for Motor Manufacturers and  
Traders (SMMT)  
Southampton Container Terminals  
South East Regional Assembly  
South East Regional Development  
Agency  
South West Regional Assembly  
South West Regional Development  
Agency  
South Yorkshire Passenger Transport  
Executive  
Southampton Container Terminal  
Stagecoach Holdings Plc  
Strategic Aviation Special Interest  
Group (SASIG)  
STVA  
Sustainable Development Commission  
Sustrans

SW Regional Assembly  
SW Regional Development Agency  
**T**  
Tarmac  
TfL  
The Institute of Advanced Motorists  
Motoring Trust  
The Motorists' Forum  
The Road User's Alliance  
The Royal Society for the Prevention  
of Accidents  
Town and Country Planning  
Association  
Trades Union Congress (TUC)  
TRL  
Tyne & Wear PTE (Nexus)  
**U**  
UK Chamber of Shipping  
UK Coal  
UK Permanent Representation  
UK Petroleum Association Ltd  
UK Tram  
UK Youth Parliament  
United Kingdom Major Ports Group  
University College London  
University of the West of England  
University of Westminster  
UPM Irvine  
**V**  
Virgin Atlantic Airlines  
Virgin Group

**W**

W Midlands PTE (Centro)

Waste Recycling Group

Welsh Assembly

West Midlands Regional Assembly

West Yorkshire PTE

Wincanton

Wm Morrison Supermarkets PLC

WWF

**Y**

Yorkshire & Humber Regional  
Assembly

Yorkshire Forward