

## **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)	<b>National Express Group</b>
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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: <b>N/A</b>	
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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?**

Movement of people and goods is fundamental to the economic prosperity of the EU but currently involves unsustainable levels of use of carbon. The most significant challenge is therefore to enable increased amounts of movement while limiting the environmental, especially carbon producing, consequences. This needs to be done in a manner which does not lead to inflationary pressures within the EU economies.

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

We believe the current philosophical approach of seeking to internalise external cost effects of transport is a blind alley. While economically sound (higher costs will change behaviour), in practice their introduction

a) will be politically unacceptable in a democratic environment (it will be seen just as another tax) and

b) will be unlikely to reduce travel significantly with all the additional costs being simply passed on to the end customer resulting in cost inflation in the economy

We strongly believe a carrot rather than stick approach is required. Alternative, more sustainable means of enabling movement of people and freight need to be introduced/enhanced/facilitated.

The Commission should also consider the need for both capital support to projects and on-going maintenance/operation support. Difficulties can arise where for instance a road is constructed but then no additional financial provision is made for the additional maintenance expenditure

#### **3. What should the Commission's role be?**

The Commission should:

- a) work to facilitate more sustainable forms of intra-EU transport where individual countries are not incentivised to do so
- b) work to identify and encourage best practice in sustainable transport across the EU
- c) Provide additional funding support to projects for any incremental costs identifiable to sustainability options where not fundable by member states
- d) Balance national funding support to ensure the developed members within the EU do not have their economic earning potential reduced by excessive transfer of funds to the less-developed members
- e) Promote political consensus for more sustainable policies within member states

## Section III- Trends and Challenges – page 6

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

Ageing – yes but the EU should recognise that part of this problem is that retirement ages have not kept pace with longevity. As well as issues for the cost of pensions it also increases the number of people with additional leisure time. This is in itself unsustainable. A probable response over time will be a gradual moving backwards of the retirement age which will reduce the effect being addressed here.

Migration and internal mobility – agreed although there is no reference to the internal birth rate which could work in worsen or ease this effect

Environmental challenges – greenhouse gas and particulate emissions are agreed as of concern. We do not believe noise is such a severe issue and should not be a priority. It is important to recognise that these concerns need to be taken ‘in the round’ rather than by mode. Thus an increase in rail mode pollution reflecting an increase in activity levels would be a ‘good thing’ if it was as a result of less activity in a more polluting mode.

Fossil fuels – agreed. It is a particular characteristic of the UK economy that relatively little of the rail network is electrified. This is being addressed but must be recognised within EU policies where most countries have higher electrified networks. The key challenge is to make alternative non-fossil fuel energy sources available both to replace diesel/petrol engines in road and rail vehicles and also for electricity generation which is key to reducing fossil fuel use for rail electric traction. Note also that fossil fuels have to be transported to the point of use, usually by use of more fossil fuel (road tankers) whereas electricity has no (or minimal) cost of moving to point of use.

Urbanisation – this is less clear cut as it is a consequence of spatial planning policies which could be adjusted. If the current policies continue however it is probable that places of work will gravitate to the large urban centres. Space limits probably therefore mean that people will live remote from their work place, generating travel to work activity. Some travel will be offset by e-working from home but this will be offset by the higher levels of economic activity. The additional travel most emphatically does not mean more travel by individual means such as private cars, if the right policies are adopted such as much more attractive public transport and workplace parking limitations

Global trends – agreed

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

It should be borne in mind that some existing EU policies will also have a side result of increasing the demand for transport. Thus the single market enables and therefore encourages workforce migration; inter-European procurement encourages extra-national manufacturing with additional transport requirements. None of these are necessarily bad things in total but may have an adverse effect on the amount of transport activity. Additionally, growing economic wealth will lead to a growing demand from individuals to be in control of their own means of transport (i.e. private cars). This can be offset if public transport is of a high enough quality.

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

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

Those given are qualitative objectives and are difficult to argue with. Much more effective would be to develop quantitative measures and targets for each of the areas and then provide the means to achieve them.

We do not agree with the stated (para 38) 'immediate priorities'. Firstly these are means to an end rather than the end itself and secondly we do not agree they are priorities.

Thus 'better integration' is actually addressing an objective of 'Making Travel Simpler' and easier to use. With this objective as the starting point there are higher priorities than integration between services and modes. For instance additional bus lanes, bus only lanes on motorways, fiscal policies that reduced public transport fares to the user, investment in more frequent services, investment in faster services are all likely to have a greater beneficial effect.

Similarly, the development of innovative technologies is geared to reducing the impact of current means of transport (which would not address congestion issues) whereas more priority should be given to encouraging changes in behaviour.

**Quality transport that is safe and secure** – the emphasis here on safety and security is disproportionate and we suspect more driven by being suited to technological solutions (which can be 'bought' rather than on behavioural change. We fully support the need for more and higher quality *public* transport, much of which is not really subject to security concerns. The best way of reducing road accidents will be by encouraging *less* use of road by individuals which again will follow from increased use of public transport.

**Well maintained and fully integrated network** – again this is a means to an end rather than an objective - it needs to be tempered with common sense. The motorway information system around the M42 appears to have been successful in helping to keep traffic moving. However, this only makes it easier for journeys to be made by road. We suggest that this is actually counter to an objective that was based around reducing the number of private journeys by road as transfer to other modes, including road coach, would have a greater impact on sustainability

**More environmentally sustainable transport** – this section appears to have confused objectives. There is a clear need to accept that some solutions in one area will have downsides elsewhere (e.g. high speed rail lines will encourage less road traffic but will inevitably worsen some local environments). It would be more helpful for the Commission to establish some hierarchy of environmental issues so that such trade-offs were more easily accepted and some of the long implementation timescales (public enquiries etc) shortened allowing environmental improvements to commence earlier.

**Keeping the EU at the forefront** – we suggest the EU's objective should be to enable EU Member States to develop technology etc as proposed, rather than it be an EU-specific activity. We do note there are some technologies that are pan-European such as ERTMS, but these need to be seen derived from EU objectives (in this case to facilitate cross-border working and reduce component costs) rather than being an objective themselves.

**Human capital** – we feel it is important that the sensible activities documented here should recognise, and allow to continue, existing good practice in consultation etc with workers whose jobs have to change as a result of changes in transport activity. We do not agree that (para 54) there should be an EU objective to improve working conditions in isolation from other factors. It is vital to the economic success of the EU that we have highly motivated workforces (in part achieved through good employment conditions) but that these remain affordable to the end customer and competitive internationally.

**Smart prices** – please see comments above under 2. In addition, price is only one characteristic of a transport offering – service quality attributes are just as important in changing peoples' behaviours.

**Linkage to planning** – We support the need to have great linkage between spatial and activity planning and the associated transport implications but given the fundamental shift to planning philosophy that this entails is not likely to be easy to achieve. We note the comment about distribution warehouses in para 59 but would point out that their locations are often determined in order to minimise transport costs.

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

The EU should consider member state domestic transport policies and seek to spread best practice between states. These will often reflect policies in areas other than transport, but which have a transport implication. Such areas could include changes to working hours, annual holiday entitlements, development of low cost air travel.

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

There are no quantified goals. Comments against each item covered above

## **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?**

As indicated above we believe the Commission's objectives are descriptions of tactical interventions rather than strategic objectives. As a consequence there is a gap in that such strategic issues remain to be addressed. The policy instruments are therefore also lacking reference to how the strategic changes will be introduced.

### **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.**

Para 64 – it is not clear what comprises a 'green corridor'; use of technology to advise drivers of problems ahead, allowing them to 'self re-route' this reducing congestion is essentially a relatively local opportunity (within a 50 mile or so range) and does not seem to be an EU-level opportunity

Para 65 – while common appraisal methodologies are sensible, this is only applicable for common sources of funds

Para 66 – experience in UK shows that this policy, in an enlarging economy, can always only be a short-term, stop-gap measure. EU policies for major infrastructure should address the medium to long term. Making better use of current infrastructure is important but complements new infrastructure rather than replaces it.

Para 68 – although not a mode we are involved in this comment has wider application – if the policy is to be to make greater use of water modes, then there have to be policy instruments that make that mode more attractive than the alternative. The EU should not be seeking to force mode change on unwilling parties as to do so implies an inefficient use of resources.

Para 75 – the EU should note and learn from the experience with trying to introduce congestion charging in Manchester. As indicated above, increasing the attractiveness of alternatives is more effective

Para 83 – we are not convinced that transnational infrastructure managers will succeed as they would introduce immense friction with the national infrastructure managers

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

The EU should:

- facilitate the development of common standards for equipment that will be used in more than one member state (standard electric car charging points would be a good example)
- coordinate and share national research across the EU (subject to patent considerations)
- fund research into technology for which there is a market demand or for which there is an EU policy demand and which is not being progressed in one or more member states anyway
- provide funding to facilitate improvements in transport infrastructure and public transport services which would not otherwise happen
- facilitate the expansion of private sector involvement/partnership in enhanced transport provision
- sponsor research into new, more environmentally friendly, power sources for long distance transport modes (current research is not directed at such high power requirement situations).

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

The EU should be clear what strategies it is proposing, what the target objectives are for each of those strategies, and develop policies that enable those quantified targets to be delivered by other parties.

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

Covered above

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.**