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DaSTS consultation
Department for Transport
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Emailed to dastsconsultation@dft.gsi.gov.uk

Consultation on ‘Delivering a Sustainable Transport System’

We are writing in response to your consultation on ‘Delivering a Sustainable Transport System’. Environmental Protection UK has considered the consultation document and welcomes the opportunity to comment on the proposals.

1. About Environmental Protection UK

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 over 110 years experience of environmental campaigning, public information provision, producing educational resources and policy formulation.

2. Our Conclusions on ‘Delivering a Sustainable Transport System’

We are pleased to see the development of the challenge based approach, which will hopefully lead to a far wider range of factors being considered within the development of our key transport networks than those considered under the current system. We welcome the strong focus on delivering reductions in CO₂ emissions, and the recognition that the reduction of noise impact must be addressed. We do, however, have a number of comments on how the challenges, and the networks, should be developed:

- There needs to be a stronger distinction in the challenges between those relating to legal obligations and those relating to aspirational targets. Where transport has a leading role in meeting legal targets the language challenges should

specifically include 'compliance' rather than aspirational language such as 'reduce', 'improve' and 'enhance'.

- International networks and tackling climate change – this section of the matrix should be left blank if there is to be no action to restrain emissions growth in the sector. Offsetting should not count as 'action'.
- Noise impacts – there is emerging evidence that noise has a social and economic cost and affects public health as well as quality of life. This must be taken into account to ensure noise impacts are adequately considered
- The delivery of a Sustainable Transport System at national and local level will need to be joined up with the National Policy Statements being developed under the Planning Act 2008, to ensure clarity in strategy for developing transport networks at all levels.
- We believe there needs to be a balanced approach to the challenges set. For example, any measures to support economic growth should not compromise measures to tackle climate change or quality of life.

These points and other comments are set out in more detail in our answers to the specific consultation questions below.

3. Our Response to Selected Consultation Questions

Part 1 – Information about you

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Email <i>ed.dearnley@environmental-protection.org.uk</i>	
Company name or organisation (if applicable) <i>Environmental Protection UK</i>	
Please tick one box from the list below that best describes you/your company or organisation.	
Small to Medium Enterprise (up to 50 employees)	
Large company	
Representative organisation	
Trade union	
Interest group	
Local government	

Central government	
Police	
Member of the public	
Other (please describe):	NGO
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 confidentially , please explain why:	

Consultation response form part 2 – Your comments

1. Are there any additional challenges that we should add to the matrix? Or any challenges we should delete?	YES	NO
<p>Please explain your reasons and add any other topics on which you would wish to see further guidance:</p> <p>a) At present no distinction is made between transport's role in delivering against legally binding targets, and delivering aspirational, but non-legally binding, targets. Examples of legally binding targets that transport plays a key role in delivering include:</p> <ul style="list-style-type: none"> • CO₂ reduction targets set under the Climate Change Act • European air quality limit values • Reducing noise impact under the Environmental Noise Directive (END) <p>In the case of air quality, the language used in the challenges is inappropriate considering transport's status as the main source of air pollutants, and the role the sector will need to play in ensuring we become, and remain, compliant with EU air quality limits (as incorporated into the UK Air Quality Strategy). The most pressing limit values to meet are PM₁₀ (likely to be extended to 2011), NO₂ (2010 or 2015) and the PM_{2.5} exposure reduction target (2020).</p> <p>In the case of noise, the aim of the END, "preventing or reducing noise exposure and preserving environmental noise quality where good" should be fully accounted for. In view of emerging evidence on health impacts and increased risk of fatality due to noise exposure, we believe that managing transport noise should be attributed to contributing to better health.</p> <p>We would suggest that the wording used in the 'contribute to better safety, security and health' goal should be changed from 'Reduce the social and economic costs of transport to public health, including air quality and noise impacts' to:</p> <ul style="list-style-type: none"> • Reduce the social and economic costs of transport to public health • Reduce the air quality impacts of transport, and ensure compliance with Air Quality Strategy limit values and targets where the main cause of breaches are transport sources • Reduce the number of people and dwellings exposed to high levels of noise from road networks, consistent with implementation of Action Plans prepared under the Environmental Noise Directive <p>b) International Networks/ Tackle Climate Change – This box of the matrix should simply be left blank, as the forecast growth in aviation and shipping</p>		

mitigate against efforts to reduce emissions elsewhere in the economy, rather than actually 'tackling climate change'. With the demanding 80% by 2050 CO₂ reduction target set in the Climate Change Act there is no evidence that growth in the UK's share of international aviation and shipping emissions can be offset by carbon reductions elsewhere in transport or other economic sectors, which will be hard pressed to meet an 80% reduction target themselves.

2. Are there ways in which we could make any of the challenges clearer and easier to understand or measure?

YES

NO

Please explain your reasons and add any other comments you wish to make:

a) As with our answer to question 1, we feel that greater distinction should be drawn between legally binding and aspirational targets in the text.

b) The reference to the emerging national noise strategy is welcome, although the strategy is long overdue and has not been published yet. It therefore would be useful to reference published data on the link between noise and health impacts, for example the recent GLA commissioned study on noise and physical health risk in London.

3. Which of the challenges do you consider as most important?

While we accept there will necessarily be prioritisation of goals, we believe a balanced approach should be taken so, for example, measures to support economic growth do not compromise measures to tackle climate change or compromise quality of life.

Please explain your reasons and add any comments you wish to make:

Again, distinction should be made between legally binding and aspirational targets, as the latter have already been agreed as important via EU or UK legislation. Beyond this it is important that a holistic approach is pursued to ensure that action on one challenge does not adversely affect another.

4. Do you agree central government should lead on the development of solutions for the national network and international networks and that regional and local government should lead for the city and regional networks?	YES	NO
<p>Please explain your reasons and add any other comments you wish to make:</p> <p>a) We agree with this approach, with the caveat that appropriate powers, guidance and resources are provided to regional and local government, and that a suitable performance framework is put in place. These are all needed to ensure that local action plays a full part in meeting the national challenges – local priorities and political concerns need to be balanced against the national interest.</p> <p>b) There is likely to be an impact on regional/local solutions from the new Planning Act, which could remove local involvement in infrastructure development via the centralised planning structure for National Infrastructure Projects (NIPs). This should be clarified in the DfT's plans, and local authorities should be actively engaged in the drafting of National Policy Statements and in the decision making process of the Infrastructure Planning Commission (IPC).</p>		
5. Are there any strategic corridors that should be added to the national network? Or any corridors that should be removed from it?	YES	NO
<p>Please explain your reasons and add any other comments you wish to make:</p> <p>Environmental Protection UK has no views on this question.</p>		
6. Do you have any suggestions on how best to ensure that solutions for the national network and international networks and for the city and regional networks are developed in a joined-up way?	YES	NO

Please explain your reasons and add any other comments you wish to make:

Environmental Protection UK has no views on this question.

7. Do you have any other comments on the approach, set out in this section, to taking forward the proposals contained in Towards a Sustainable Transport System ?	YES	NO
<p>Please explain your reasons and add any other comments you wish to make:</p> <p>In line with our answers above, we believe that where legal targets are involved a focus needs to be on cost effective compliance, rather than deciding measures on a cost beneficial basis. The transport sector must play it's full part in meeting targets in areas such as CO₂ reduction and air quality, and shouldn't be allowed to transfer it's responsibilities onto other sectors unless cast iron guarantees are obtained that these other sectors will make the desired cuts. The mitigation of noise impacts must also be at the heart of transport planning.</p>		
8. Would you like to see any significant changes (additions or deletions) to these Strategic National Corridors?	YES	NO
<p>Please give the supporting evidence for any suggested changes.</p> <p>Environmental Protection UK has no views on this question.</p>		
9. Are there changes (additions or deletions) you would like to see to the strategic road infrastructure list?	YES	NO
<p>Please give the supporting evidence for any suggested changes.</p> <p>Environmental Protection UK has no views on this question.</p>		
10. Are there changes (additions or deletions) you would like to see to the passenger rail service list?	YES	NO
<p>Please give the supporting evidence for any suggested changes.</p> <p>Lines heavily used by commuters should also be included in the list, particularly those serving London. These are currently not included in the list as they connect widely distributed locations to strategic centres, rather the connecting 'centre to centre'. Whilst we understand the logic of this approach it ignores the huge role that commuter lines have in creating deep labour markets, as acknowledged in the Eddington report - 'public transport is fundamental to the success of the central London economy, by providing a uniquely deep labour market. 89 per cent of travellers to central London in the peak (1 million each day) arrive by public transport; and only 8 per cent by car'¹. A preeminent focus on centre-to-centre links may starve commuter</p>		

¹ Para 1.62, The case for action: Sir Rod Eddington's advice to Government

lines of investment.

11. Are there changes (additions or deletions) you would like to see to the rail freight service list?

YES

NO

Please give the supporting evidence for any suggested changes.

Environmental Protection UK has no views on this question.

12. Are there changes (additions or deletions) you would like to see to the air service list?

YES

NO

Please give the supporting evidence for any suggested changes.

Environmental Protection UK has no views on this question.

4. Contact Us

If you would like to engage with us further to develop any of the suggestions we have raised in this response, or require any further information on the views expressed, please contact:

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