

Rt Hon Grant Shapps MP
Secretary of State for Transport
Department for Transport
Great Minster House
London, SW1P 4DR

28th August 2020

Also sent via email to the Transport Decarbonisation plan team at: TDP@dft.gov.uk

Dear Secretary of State,

Decarbonising Transport Setting the Challenge

We thank you for the opportunity to respond to the above consultation and your Department's most invitation (08th July) of a call for ideas: [Creating a plan to decarbonise transport](#).

The Thames Valley Chamber of Commerce is the only accredited Chamber cover the Thames Valley (Berkshire, Buckinghamshire and Oxfordshire) and Swindon areas with 4000+ businesses in membership. Our membership includes the full range of companies from start-ups and high growth innovators to large corporates and multi-national organisations. We have several businesses operating across many aspects of transportation (including operators and service providers, users, consultants, technology-driven and manufacturing) with whom we have consulted in helping shape our response below and in our supporting 'annex' of comments.

The Chamber have been very active in supporting Her Majesty's Government efforts to support the UK economy during the current COVID-19 pandemic. Our own "*Restart, Rebuild, Renew*" initiative and programme of activities is evidential proof that a business-led approach to "Building Back Better" does have impact and will sustain the UK and Thames Valley's economic recovery moving forward. Delivering innovative solutions, and initiatives that have – perhaps – been somewhat slower in progressing pre-COVID-19, is wholeheartedly encouraged

General Comments

1. We welcome the outline of the scale of the challenge and the many ideas and initiatives throughout.
2. We both commend and welcome the ambition (expressed in Chapter 1) and the six objectives/key points (in Chapter 5) but have concerns as to how these ambitions, yet unsupported by evidence of comprehensive routes to delivery, can be achieved.
3. Welcome the recognition of the need for a more comprehensive and cross-modal approach. We look forward to being consulted on and receiving a comprehensive Strategy for delivery which we hope will include detail showing how the ambition, objectives and more comprehensive, cross modal approach, this will be achieved in real terms and how progress will be measured.
4. We commend you to invest in projects and initiatives that will deliver aims and ambition. Quick project wins would include delivering a Western Rail Link to London Heathrow (we reference you to our earlier correspondence on this matter); Innovative ideas and approaches might focus on aviation – which underpins

the UK economy, supports over 230,000 jobs directly and more than one million jobs indirectly, generating over £22 billion for the UK economy (see: “a vision for aviation – flying without carbon” within the annex).

5. We commend the support and incentives to business to develop and deliver de-carbonisation solutions. However, we do question whether the funds allocated will be enough or yet, pending the Strategy, whether they are sufficiently targeted. We also ask that the Strategy gives enough balance to addressing market failure to ensure that an equitable and comprehensive nationwide approach can be delivered.
6. Reflecting on a post COVID-19 environment, we would like to see housing standards being reviewed to enable home working, including small scale, clean business activities and facilities for a no-carbon age, e.g. charging points, digital infrastructure, etc.
7. We have concerns over the lack of evidence of integration with many other national (and regional) strategies. Further, we consider the scope of the ‘Challenge document’ is narrow and would suggest some areas which require further cover within the De-carbonising Transport Strategy (or require explicit links to and from other national strategies) – see annex below.
8. We have concerns over the lack of evidence of an understanding of the scale of the challenge and constraints on delivery, e.g. outside major conurbations.

The above submission is made in conjunction with our completing the online questionnaire.

Finally, we thank you, once again, for the opportunity to contribute and look forward to having the opportunity to actively be a part in developing the strategy and delivering a forward programme that can help secure the UK’s and Thames Valley’s future economic well-being and prosperity through a decarbonising transport programme.

PLEASE NOTE: Your online survey questionnaire crashed three times during our attempts to load additional comments. The reload process took us back to square one! Sadly, we have had to ‘give-up’ completing this survey and providing the fullest comments on the consultation. If you would like to receive these please do let me know.

Yours sincerely



Paul Britton
Chief Executive

Decarbonising Transport Setting the Challenge Annex of Comments

The steps we should take to reduce emissions from transport – an example

A “vision for aviation – flying without carbon”

We are sure the Her Majesty’s Government are and will be speaking with all sectors in developing its Strategy and delivering the challenge. By way of an example, we comment a “vision for aviation – flying without carbon” presented to us by our membership.

Earlier this year the UK aviation sector became the first in the world to commit to net zero by 2050 (and has published a detailed roadmap to get there) including proposals for taking carbon out of flying through more efficient aircraft and airport operations, and; putting carbon back in the ground through robust carbon removal measures (prior to zero carbon flight becomes reality). There is a real opportunity for the UK, that could be developed/articulated into any future Strategy, to ensure we remain ahead of our international competitors (already establishing a lead) and avoid losing five years or more from Sustainable Aviation Fuel (SAF) development.

- Only 5% of planned global renewable fuel plants are in the UK with our first plant opening only in 2025. A SAF revolution led from the UK offers huge economic opportunities:
- We can build a UK lead in a globally competitive sunrise sector, with real technology export potential. The total value of the global aviation fuel market is forecast to rise to \$450bn by 2026. SAF will represent growing percentage of that.
- We can create jobs: by 2035, even on a conservative estimate UK SAF production sufficient to supply around 8% of UK jet fuel needs could generate up to £2.7bn and support 18,800 jobs³.
- We can level up: building plants in the next few years offers investment stimulus in areas across the UK and builds on existing skills and infrastructure.

To send a clear mid-term signal that will support SAF to develop at scale, measures are needed to stimulate supply and incentivise demand. We would support proposals, made by [Sustainable Aviation](#), calling for an immediate step of £500 million of match-funding or loan guarantees – to induce match-funding by the private sector to kickstart building the first two to three commercial SAF plants within two years for them to start producing within five years.

Creating a plan to ensure the UK transport is net zero in emissions by 2050

In our letter we outlined the need for the De-carbonising Transport Strategy to consider/cover other areas (because it is too narrow) to ensure an integrated approach *and* to help ensure UK transport is indeed net zero by 2050. We therefore outline the need to address in the strategy:

Scope: total carbon and energy implications

The document appears to:

- Explicitly exclude consideration of the “GHG emissions associated with power generation and distribution for transport, or the construction of transport infrastructure...”;
- To fail to fully address the energy requirements of de-carbonisation solutions.

- Not fully consider how different technical solutions, e.g. for rail, will place different demands on the absolute and peak capacity of the UK's energy infrastructure and on the specification for and network of infrastructure. (noting Network Rail are considering the options for decarbonisation of rail – see media report [HERE](#)).
- Not indicate how the carbon, energy or other implications of the generation of alternative sources of vehicle fuel will be considered.

We do not expect that all relevant matters should be incorporated into the De-Carbonisation of Transport Strategy but we do not consider that “noting their consideration” is sufficient, acknowledging all the relevant links and clarity on how transport and energy strategies will be reconciled whether by the process, criteria or parameters for a judgement and timescale. This will avoid failure to consider all the dimensions of de-carbonisation which may result in the selection of a less effective strategic choice and/or limited de-carbonisation or transport outcomes.

Scope: International travel

The document is explicit that only domestic travel is included within the evidence base and targets and it is not clear whether international road travel by UK residents and companies is included. We acknowledge that the impacts of international aviation and maritime are difficult to measure and allocate and that a collaborative response should be sought. There is a danger that the impact of international travel is postponed whilst seeking that response. We would urge that best estimate measures are identified, and that the Strategy is developed to tackle the carbon emissions as a basis for moving forward independently or with willing collaborators at the earliest opportunity.

Scope: Strategic spatial planning and integrating other public service strategies

The Challenge document focuses heavily on reducing emissions from transport and on modal shift to low or no carbon forms of transport. It does not significantly address the opportunities for reducing some of the need to travel. The Strategy should consider the opportunities in new developments of reducing the need to travel (ensuring these are not crude stealth tax proposals) as well as providing no carbon solutions and public and collective transport as a matter of course.

By way of examples such an approach may require (i) the provision of schools within accessible walking or cycling distance to more pupils – and effective enforcement to remove ‘associated school traffic’ off the roads at peak hours (rather than shifting the problem); (ii) the provision of health, including hospital-based, services to be distributed more locally or for dedicated transport to be provided; (iii) although shopping patterns are still changing, consideration should be given to relocating retail close to residential areas and to public transport/nodes.

Spatial planning strategies should plan for transport itself whether by designing transport networks for no carbon vehicles, public and SMART transport, major and last mile distribution hubs, integrated public transport hubs et al; and should plan for new patterns of development which reduce the need to travel. This requires a more articulated, researched approach to the simple, and rather crude, approaches of looking to price cars off roads at peak hours or restricting car-travel into town centres.

Housing standards should be reviewed to enable home working including small scale, clean business activities and facilities for a no-carbon age, e.g. charging points, digital infrastructure.

The Transport Strategy should show clear links to national spatial planning strategy. Whilst locally led solutions should deliver the most effective results, Government should define minimum standards (plus) to be met or exceeded except in the most exceptional cases. Carbon emissions should be considered in any new development and in any decisions on the provision or reorganisation of services.

Finally, we would encourage advocating that all national public service strategies should be 'De-carbon proofed' to ensure that initiatives to, for example achieve greater efficiency in delivery, do not concentrate services in a way which demands personal transport or frustrates access.

Scope: digital infrastructure speed and capacity

The Challenge document identifies digital solutions to deliver improved transport solutions. It is silent on the 5G Strategy, the opportunity for enabling greater working from home and supporting business use which will also reduce emissions and how – effectively implemented – 5G technology can be used to 'knit-together' a broad range of strategy aims and objectives – a technology driven recovery and decarbonisation strategy.

Scope: skills

There is only one passing reference to the need to and opportunity of developing skills in the disciplines and sectors supportive of delivery of the Strategy and the Science Plan to enable this intended for publication in Spring 2020. The development of a skills pipeline is crucial to delivery and to support R&D and businesses in the relevant technology sectors and in transport itself. We urge you to prioritise development and delivery of a related Skills Strategy.

Covid-19

The document was prepared before the potential impact of Covid-19 could be understood. We would urge that the impacts on travel, public attitudes and behaviour and particularly the risks and opportunities are considered, including but not limited to a full range of issues, including changes in travel to work/home working/education patterns; shopping practices; national/international travel patterns and an appetite to travel; perceptions to and use of public transport.

Other Areas of consideration

Not detailed here but we would encourage a more detailed consideration around (i) Understanding the challenges of rurality and sparsity (e.g. is it feasible for public transport to be available as the natural first choice in rural areas?); the constraints on the elderly, disadvantaged groups and people with mobility issues (who all may struggle with public transport and expectations of walking, distant access to rail stations and public services).

Levelling up

The document makes only one reference to levelling up, in the context of the opportunity of aviation expansion to deliver this. The Strategy must offer solutions which enable opportunity, and which do not exacerbate present transport inequalities. Whilst we support providing incentives to business development of technology, this should be time or otherwise limited and priority should then be given to prioritising provision where the market will not provide.

Cultural shift

The document refers to the need for behavioural change, but that learning is still required. The document implies a series of incentives, service improvements, regulation and penalties.

There is little evidence, to date, of an understanding of the need to change hearts and minds in addition to measures of facilitation and improvement and some reference to technical information. The Strategy should include a programme to change:

- the relative perceptions of public and private transport.
- the perceived status of the unnecessarily powerful vehicle or multiple vehicles (a body image problem?)
- the value to current and future generations of smaller no emission vehicles.

- the value to self of healthier forms of transport.

And should work with business to deliver on this through, e.g. provision of attractive products and services, marketing strategies, internal company transport arrangements and incentives.

Incentives and penalties

The Challenge document rightly highlights the need for facilitation, incentives and corresponding regulation and penalties. The Strategy should:

- adequately balance and time these so that regulation and penalties do not precede the opportunity for business or individual users to adopt a low carbon alternative.
- be clear, robust and challenging about deadlines and timescales.
- understand what is easy in one location is too costly or impossible in another.
- tailor regulation and penalties at a relevant local or sector level so that those without access to an alternative are not unfairly penalised.
- ensure that the approach enables levelling up and does not exacerbate inequalities.