

DEFRA response by e-mail 22 December 2006

Andrew

I've read through the consultation and I think the general message from Defra is that it's a really positive step forward. Plans to collect more data, so environmental performance can be accurately measured, is particularly welcome as is an acknowledgement that although the rail industry is environmentally friendly compared to road/aviation - more can be done to improve environmental performance - especially on addressing worsening energy efficiency and rolling stock weight. One area not really covered as far as I can tell is the role of train leasing companies - is there any way of identifying ways to influence the type of rolling stock the companies buy and lease - the age old problem of incentivising companies on relatively short-term franchises to improve environmental standards will no doubt continue and some way of targeting leasing companies would be welcome.

It was interesting to see comments from the workshop identifying trade-offs between CO2 and local air quality emissions (i.e. old rolling stock more energy efficient but diesel engines produce more NOx and particulates). We're keen that this isn't used by the industry as a way of blocking the introduction of environmental standards. There is no reason why incentives can't be introduced to improve both CO2 and local air quality.

We agree with comments from the industry that it's important to ensure environmental standards don't result in an unsustainable rise in ticket prices and it's important to maintain the increases in punctuality and robustness of the network ensuring rail is a viable alternative to car usage. However, I think there needs to be some new incentive for the industry to improve environmental performance - be they KPI's or environmental charges. We haven't had time to address the various suggestions on environmental criteria / controls (such as metering - increasing electricity charges etc) but we aim to work with DfT in the development of the HLOS and accompanying paper due out next summer and probably best if we aim to feed our main concerns / suggestions into those workstreams.

I think we would be interested in attending future Sustainable development steering group meetings or the Rail Sustainable Development Group - grateful if you could send details through for these (although could get this from DfT if it's a problem).

I did get in touch with the Environmental Noise people and they asked if ORR could ensure that the action plans from the Environmental Noise Directive are taken into account in the emerging sustainable development policy statement and any possible ORR specific plan. I'd be grateful if you could copy me in to any similar consultations in the future as well as the general Sustainable development email address.

Many thanks,

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