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Dear

Response to ORR consultation on the Sustainable Development and Environmental Opportunities

This letter forms an EERA Officer submission in response to the above consultation.

The focus of this submission relates to the broad principles of what is proposed by the ORR. Although it is welcome for the ORR to seek environmental improvements within the rail industry it is felt that an approach which involves increasing costs to the rail industry without a commensurate unit cost to other modes could be counter productive in terms of overall environmental and social benefits, as well as impact on the regional and national economy. Assisting the rail industry to improve its performance is however supported.

An important aspect to managing all transport networks is the attractiveness to use by consumers. Price is also a critical aspect of choice by consumers in the market led system in the UK. The ORR identifies the rail industry as a single industry, however it should be considered as two industries: passenger transport; and freight transport. Within each of these industries there are air, ship and road alternatives that need to be considered and investment in one potentially increases its attractiveness to consumers while increasing costs may reduce attractiveness of a particular mode. Currently rail freight and rail passenger transport compete for limited capacity within the network and while environmental performance in the rail industry should be encouraged it is important that increases in costs do not shift demand to road networks, similarly constrained, but having a less clear absolute limit to capacity. Road networks are able to accommodate increased use, but with subsequent reduced performance, potentially more accidents and other costs to the national and regional economy.

In terms of reducing transport related carbon emissions overall and the potential contribution of rail is considered in the VIBAT Study, accessible via the Bartlett School of Planning website. This study identifies the increased role of rail in reducing transport emissions and the relative performance of rail. Whether these potential contributions are achievable on a congested rail network is quite another thing.

The operation of the rail network is very important to the East of England, in relation to passenger transport and for the transport of freight from East of England ports. The East of England is accommodating significant areas of housing growth, containing as it does accommodate three out of four of the Government Growth Areas, as well as significant growth adjacent to London. This growth will put strain on existing rail networks. Ports in the East of England are due to expand significantly and as such investment in improved capacity to accommodate increased freight movements is required. The rail network requires investment to both meet social and environmental objectives and assist the economy. The Freight Scoping Study for the East of England (Stage 2, June 2006) assessed the environmental costs from increased HGV movements related to port development in the East of England, and based on the available freight paths being constrained to 2005 levels, identified a potential £31 Million in Sensitive Lorry Miles (SLM) as the potential price of not investing in rail to meet the growth in freight traffic.

Taking forward the seven principles of the EU Sustainable Development Policy will need to be applied at the National / DfT level and should determine the relative modal investment in networks at the national level and take account of issues raised by Eddington in relation to the economy. Once mechanisms are put in place at the national level to enable more sustainable transport movements, then charging regimes could be reasonably applied within this wider national pricing framework. At present no clear pricing framework exists at the national level.

To close, although assisting the rail industry to deliver improved environmental performance is welcomed, investment in rail capacity will be critical to rail contributing to more sustainable travel movements within the East of England. The opportunities for investment to improve rail passenger transport services in the East of England, as well as rail networks to meet the demands of freight which serve wider UK market needs can contribute significantly to more sustainable transport movements and reductions in carbon emissions.

I hope that the above comments are of assistance.

Yours faithfully

A handwritten signature in black ink, appearing to read 'S. C. Lamont', followed by a vertical line.

Sheena Lamont

Regional Planning and Transport Officer