

Consultation Response Form

PART 1 - Information about you

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Company Name or Organisation (if applicable)	Unite the Union
Please tick one box from the list below that best describes you / your company or organisation.	
<input type="checkbox"/>	Small to Medium Enterprise (up to 50 employees)
<input type="checkbox"/>	Large Company
<input type="checkbox"/>	Representative Organisation
<input checked="" type="checkbox"/>	Trade Union
<input type="checkbox"/>	Interest Group
<input type="checkbox"/>	Local Government
<input type="checkbox"/>	Central Government
<input type="checkbox"/>	Police
<input type="checkbox"/>	Member of the public
<input type="checkbox"/>	Other (please describe):
<p>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:</p> <p>Unite the Union has over 250,000 members in its main Transport Sectors: Civil Air Transport; Docks and Inland Waterways; Passenger Transport; and Road Transport Commercial, Logistics and Retail Distribution. We seek the views of our members through our lay member committees at national and regional level.</p>	
<p>If you would like your response or personal details to be treated confidentially please explain why:</p>	

PART 2 - Your Comments

1. Are there any additional challenges that we should add to the matrix? Or any challenges we should delete?	YES <input type="checkbox"/>	NO <input type="checkbox"/>
Please explain your reasons and add any additional topics on which you would wish to see further guidance :		
2. Are there ways in which we could make any of the challenges clearer and easier to understand or measure?	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>
<p>Please explain your reasons and add any additional comments you wish to make:</p> <p><i>We have concerns over the concept of a 'competitive' transport industry rather than a 'sustainable' transport industry. We believe that the concept of competitive is too restrictive. In a competitive transport industry, by definition, companies and transport modes will be in direct competition with one another. While this might bring about economic efficiency, it will not bring about sustainable transport. Economic efficiency will only be achieved by a 'race to the bottom' in terms of standards, especially vehicle and labour standards.</i></p> <p><i>In Towards a Sustainable Transport System (TaSTS) the Department identified a range of potential challenges relating to the better safety and health goal, including reducing deaths and serious injuries. By adopting a sustainable transport industry concept the Department could then legitimately include areas such as working time – transport workers work some of the longest hours of all workers in the UK. Also the increase use of shift patterns, split shifts but especially nightshifts means that many transport workers, especially professional drivers and warehouse workers, are working against their circadian rhythms, increasing their risk of an accidents to themselves or others, and in the longer term damaging their health.</i></p> <p><i>The period between 02:00 and 06:00 is particularly dangerous, especially for large goods vehicle drivers and bus and coach drivers who are driving on the road at that time.</i></p> <p><i>However, we are aware the employers are pushing for a reduction in night time lorry bans. Arguing that that this would result in a reduction of congestion. While this may be true, we believe it will result in even more drivers driving during the most dangerous period for road accidents of 02:00 to 06:00.</i></p> <p><i>Also we would question the concept of just-in-time (JIT) delivery systems. These may be economically efficient, but they are not environmentally sustainable. Especially in</i></p>		

regards to lorries being part loaded and returning empty. A major reason for the growth of JIT has been companies reducing their inventory levels. This has resulted in more and smaller deliveries. In a number of cases the lorry has effectively become a mobile warehouse.

If transport is to become sustainable then companies should increase their inventory levels, this would mean reversing the unsustainable trend of lean manufacturing and retailing.

Also we believe the document does not take up the potential of relocalisation. Relocalisation means moving away from globalisation and back towards local production and consumption. If we are to have a more sustainable transport system this will require us buying more locally manufactured goods, locally grown food and services. This would protect local freight transport and allied services, and increase local employment in the manufacturing, public transport and services sector more generally.

The trend over the last 30 years or more has been towards ever increasing globalisation, which has created both growth and jobs in the transport sectors. Retailers and manufacturers have sought ever cheaper supply chains. Food and manufactured products travel much further before they reach us. People travel longer distances to get to work, now on average two hours, as industries in many local areas are closed down, centralised, or offshored.

A classic example is the Young's prawn plant in Annan in Scotland, next to the fishing grounds. 120 jobs were lost in the plant, when the decision was taken to air freight the prawns to Thailand for processing, and then re-import them back to sell in UK shops.

Another example is what has been called the 'great food swap' where Britain imports 240,000 tonnes of pork from the Netherlands each year - and exports 195,000 tonnes back.

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

Creating a sustainable transport system rather than a 'competitive' transport industry.

Integrating transport modes

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

Creating a sustainable transport system which takes into account all the major issues, including those which affect the people working within transport.

One of the underlying problems is that transport is perceived both by manufacturers and retailers as a cost. Therefore they attempt to reduce the cost to the lowest level. This has resulted in transport companies not being paid the correct economic price for their services. This is compounded by the fact most if not all transport modes do not presently internalise its environmental cost.

So it is essential that all forms of transport pay their true environmental costs.

In regard to integrating transport modes for both goods and people, we are concerned that no direct mention of the integration of the various transport modes. This we believe is essential if we are to have a sustainable transport system.

If we are to encourage a model shift from the car to public transport then considerations has to be given to both to the price charged for public transport and the ease of use, especially in regard to through ticketing.

Currently,

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

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

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

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

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 <input type="checkbox"/>	NO <input type="checkbox"/>
Please explain your reasons and add any additional comments you wish to make:		

7. Do you have any other comments on the approach, set out in this section, to taking forward the proposals contained in <i>Towards a Sustainable Transport System</i> ?	YES <input type="checkbox"/>	NO <input type="checkbox"/>
Please explain your reasons and add any additional comments you wish to make:		

ANNEX 2 - Code of Practice on Consultation

The Government has adopted a Code of Practice on consultations. The Code sets out the approach Government will take to running a formal, written public consultation exercise. While most UK departments and agencies have adopted the Code, it does not have legal force, and cannot prevail over statutory or other mandatory external requirements (e.g. under European Community Law). The Code contains seven criteria. They should be reproduced in all consultation documents. Deviation from the Code will at times be unavoidable, but the Government aims to explain the reasons for deviations and what measures will be used to make the exercise as effective as possible in the circumstances. The seven consultation criteria are:

1. **When to consult:** Formal consultation should take place at a stage when there is scope to influence the policy outcome.
2. **Duration of consultation exercises:** Consultations should normally last for at least 12 weeks with consideration given to longer timescales where feasible and sensible.
3. **Clarity of scope and impact:** Consultation documents should be clear about the consultation process, what is being proposed, the scope to influence and the expected costs and benefits of the proposals.
4. **Accessibility of consultation exercises:** Consultation exercises should be designed to be accessible to, and clearly targeted at, those people the exercise is intended to reach.
5. **The burden of consultation:** Keeping the burden of consultation to a minimum is essential if consultations are to be effective and if consultees' buy-in to the process is to be obtained.
6. **Responsiveness of consultation exercises:** Consultation responses should be analysed carefully and clear feedback should be provided to participants following the consultation.
7. **Capacity to consult:** Officials running consultations should seek guidance in how to run an effective consultation exercise and share what they have learned from the experience.

If you consider that this consultation does not comply with the criteria or have comments about the **consultation process** please contact:

Lec Napal
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Zone 1/33 Great Minster House
76 Marsham Street
London, SW1P 4DR
email: consultation@dft.gsi.gov.uk

A full version of the Code of Practice is available on the Better Regulation Executive web-site at:
<http://www.berr.gov.uk/files/file47158.pdf>