Review of the Royal Commission on Environmental Pollution's 20th Report on Transport and the Environment – Developments Since 1994

A Report to the Royal Commission on Environmental Pollution

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1 Introduction

1.1 Terms of Reference of this Review

The Royal Commission on Environmental Pollution (RCEP) has embarked upon a policy of reviewing its reports on a systematic basis, approximately three years after their publication. This policy was first applied to the Commission's 19th Report on *Sustainable Use of Soil*, and the resultant evaluation can be found on the Commission's website[1].

In line with this policy, the Commission subsequently invited the Institute for European Environmental Policy (IEEP) to carry out a review of the 20th Report, *Transport and the Environment – Developments since 1994*. This document constitutes the report of IEEP's review and analysis, and is designed to meet the objectives given to IEEP, which were as follows:

Objectives

The objectives of the review are:

a. to determine whether the conclusions of the Commission's 20th Report need any significant modification in the light of subsequent events
b. to assess the progress the Government has made in carrying out actions promised in its response to the 20th Report (taking into account, if relevant, planned actions by other parties referred to in that response)
c. to assess how effective the Commission was in producing the 20th Report and presenting its views.

The consultant is expected to state clearly the conclusions reached on them, but not to make recommendations.

Although the work was to be focused almost exclusively on the 20th Report, it was also to assess progress against the targets first set out in the 18th Report (the Commission's original report on transport and environment). It was also envisaged that some aspects of the 22nd Report (on *Energy – the Changing Climate*) might also prove relevant.

The full Terms of Reference for this review can be found in Appendix III. In summary, the main tasks to be reflected in this review are as follows:

- *Part I* is an overview of the preparation and publication of the Commission's 20th Report, to cover issues such as: the Commission's reasons for choosing the subject, the audiences it envisaged and its objectives; how the study was structured; how the information submitted to the Commission, and other data sources, were utilised; the time taken for the study, and how that compared with the timetable originally planned and the times taken for other studies; how the Report compared with other recent Commission reports in terms of length, structure, sales and press coverage.

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[1] http://www.rcep.org.uk/soilrev.html

- *Part II* gives a summary of subsequent developments and the present position in each of the fields covered by the 20th Report, reflecting the chapter structure and content of the Report.

- *Part III* draws conclusions about the effectiveness of the 20th Report, on the basis of the information and analysis in Parts I and II. It considers, *inter alia*: whether this was an appropriate report for the Commission to produce; whether it was timely; whether the broad analysis in the report remains valid, or whether there are any significant factors which the Commission appears to have overlooked; the extent to which subsequent Government policies and actions have been in line with the Commission's views; whether there are ways in which the Commission could have carried out its study more effectively or efficiently, or disseminated the messages of the report more effectively; and whether any of the approaches adopted for this study were notably effective or productive.

The structure of the report which follows, and the underlying methodology, are substantially (although not exclusively) based on these Terms of Reference.

1.2 Methodology

Before describing the methodology adopted in this review, this opening section first airs a number of underlying issues which the authors have taken into account in establishing their approach, undertaking the review itself, and drawing their conclusions.

1.2.1 The Concept of Effectiveness

A key element of this review is to establish to what extent the 20th Report was effective in meeting its objectives. In this context, this in turn requires the adoption of some measures or means to assess effectiveness in influencing policy.

It is rare for any one individual or group to be able to claim to have established a national policy single-handed, unless perhaps for a Prime Minister or his or her immediate advisors. Most policy actors have a much more indirect and/or collaborative role in policymaking. Furthermore, it is usually the case that similar or complementary views from a number of different policy actors will combine to influence policy, even if those views all emanated from a single source at some point. Also, most government policies are a compromise, not only between different views and interests, but also between what is ideally desirable and what is politically, financially or practically possible. This too serves to obscure the chain of influences which may have shaped a given policy decision.

For these and other reasons, it is particularly rare for any one policy actor to be in a position to demonstrate their exclusive success in influencing and shaping any given policy, although of course many may claim to do so.

Policymaking is also a rather complex and untransparent process, so demonstrating cause and effect in a review such as this is extremely difficult or even impossible in most cases. Furthermore, policy influences are complex in their actions and interactions. There is not even an agreed model of how policy development and influencing takes place, and this too is an obstacle to the rational analysis of policy

formulation. Furthermore, different policy actors will themselves have very different views and interpretations of what or who really led to a given decision being made. Owens and Rayner[2] set out a more complex theoretical framework for 'policy learning' within which the Commission operates, but it is beyond the scope of this review to address this framework in any detail.

Another factor in reviewing the effectiveness of a Commission report is that most policy decisions are taken 'behind closed doors', so concrete evidence of the process is likely to be limited. Even if documentary evidence exists (eg in minutes of meetings), this is often not in the public domain, or may not in any case give a clear indication of the thinking behind a decision. Governments in particular rarely give explicit credit for policy influences to outside parties. As a result, there is usually no 'audit trail' of a policy decision which can be analysed.

Influence on government policy may also be indirect and delayed, rather than direct and immediate, but is nonetheless important for that. If so, then the difficulties in determining cause and effect are multiplied. Indeed the Commission's 18th Report, its first on *Transport and the Environment,* is a good example of this. Given that the then Government gave only a very limited and informal response to the Report, and did not obviously change its policies as a result, then the Report could by some criteria be judged a failure. By other measures, however, it will be argued below (in Section 2.1.2) to have been one of the Commission's most influential reports. We would therefore argue that, while a formal government response and subsequent actions are clearly important, indirect influences on policy should also be taken into account.

1.2.2   Criteria for Success or Failure

Given all of the above, it is extremely difficult to establish objective grounds for the success or failure of the Commission's 20th Report (or indeed any other scientific or policy paper) in influencing government policy. We have therefore used a range of indicators and criteria in our review:

- Government's formal response to each of the key points of the 20th Report
- Government's longer term policy response on each issue, and the outcome
- Success or failure in moving towards the Commission's targets from the 18th Report
- Media response, both directly to the 20th Report, and subsequently to the issues raised
- Expert and stakeholder views on the 20th Report

1.2.3   Main Working Methods

In compiling this report, in line with the requirements of out terms of reference, we have used primarily the following working methods.

- An *analysis of the RCEP's own papers*. The minutes and working papers of the Commission and of its Transport Working Group were made available to us, and

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[2] Owens S and Rayner T, *When Knowledge Matters: The Role and Influence of the Royal Commission on Environmental Pollution*, J Environ Policy Plann 1: 7-24 (1999), pp9-11

from these we have been able to establish the history and development of the 20th Report, as described below.

- An *analysis of events by topic area*. In Appendix I to this report, there are a set of tables which track the main issues raised in the 20th Report, and trace against these the Government's formal response to each of the key points; its longer term policy response on each issue; and subsequent outcomes. These have then been summarised with commentary in Part Two of the main text.

- An *analysis of success or failure in meeting the Commission's targets* has been undertaken. The full analysis can be found in Appendix II of this report, and the results are summarised and commented upon in Part Two of this report.

- The *media response*, both directly to the 20th Report, and subsequently to the issues raised, has also been considered.

- Selective expert and stakeholder views on the 20th Report have been elicited. Interviewees included the RCEP Secretariat's principal authors of the report, selected Commissioners, and outside experts. The full list of those consulted is included in Appendix IV.

2 The Royal Commission's Transport Reports

2.1 *The Context and Impact of the 18th Report*

This report is primarily intended to evaluate the Commission's 20th Report, its second on transport, and to address only limited and relevant aspects of its predecessor the 18th Report. For various reasons, however (and not least the relatively short interval between the two), it is impossible to evaluate the 20th Report without some reference to the 18th and to the relationship between the two.

2.1.1 *The Context of the 18th Report*

The year 1989 was perhaps the high water mark of the car-oriented transport policies which epitomised the early years of the Conservative government. This was marked by the publication of revised road traffic forecasts which predicted a dramatic increase in road traffic, and of a greatly expanded road-building programme as set out in the consultation paper *Roads for Prosperity*, the thrust of which was to be confirmed in the following year. At this stage the priority was to provide more road space for growing levels of traffic, and there was initially little concern in government for the environmental consequences of this approach.

However, while it is easy to characterise the 1980s and much of the 1990s as the era of the 'Great Car Economy' on this basis, it should be borne in mind that there were some positive developments in transport and environment policy from the start of the 1990s. Climate change (which the Royal Commission had first discussed in its first report in 1971) had been recognised to be an important issue by the then Prime Minister, Margaret Thatcher, as early as 1988. Following on from this, the 1990 White Paper on the environment, *This Common Inheritance*, was the UK government's first major policy statement of environmental strategy, and the concept of integrating the environment into sectoral policies was central to this document. It also signalled a change of emphasis towards transport policy in particular. In the same year, the House of Commons Transport Committee recognised the disparity between the increasing environmental concerns and the Government's approach to transport policy. They stated that they could not see how the latter was 'an adequate basis for promoting a strategic transport policy that is consistent with the requirements of sustainable development'[3].

From this starting point, mounting concerns over climate change gave rise to the fuel duty escalator from 1993. Furthermore, a report by Ecotec at around the same time highlighted the potential for changes in land use and planning to affect CO_2 emissions from transport. Accordingly, planning guidance note PPG13 was revised in March 1994, and this made it explicit, for example, that reducing the need for travel, especially in the local area, was central to the new guidance.

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[3] Cited in paragraph 13.1 of the Commission's 18th Report

The other major environmental issue to receive attention at this early stage was air quality, but it was argued that the introduction of catalytic converters on cars from 1992 would do much to improve local air quality, at least in the short-term[4]. Beyond this, there was little governmental attention to the broader environmental or social impacts of a road-dominated transport policy.

At the international level, the impact of transport on the environment was also coming increasingly into prominence. In 1988, the OECD published a report on transport and the environment[5], which was followed by a European Conference of Ministers of Transport (ECMT) special session on transport and the environment which subsequently led to a ECMT/OECD report on the policy implications[6]. Similarly, in the academic literature, the impact of the proposed road building programme was receiving attention[7], as were the health impacts of both air pollution and noise from transport[8]. In the early 1990s, an increasing number of books appeared linking the problems of the transport sector to the wider debate about environment and sustainable development both in the UK and Europe[9].

Goodwin later characterised the developments in the late 1980s and early 1990s, including the realisation of the implications of the predicted road traffic forecasts for road building and the public purse, and the increasing environmental awareness and debate about sustainable development, as the emergence of a 'new realism' in transport policy[10]. The Commission's 18th Report, therefore, did not appear in isolation, but contributed to an existing and ongoing debate.

2.1.2   The Impact of the 18th Report

The Commission's 18th Report, its first on transport, was published in 1994. It attracted considerable attention in the media and amongst transport and environment professionals, for a number of reasons. It was, for the UK at least, the first report from a highly-respected source which attempted to deal with transport modes in a comprehensive and holistic way, and also the first to describe a very broad range of environmental impacts, including noise, waste material, land use, etc (see Table 2.1 below). By adopting this approach, it was able to draw a clear and overarching conclusion that the current trends in transport use were far from sustainable.

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[4] *Atmospheric Emissions from the Use of Transport in the United Kingdom* M Fergusson, C Holman, and M Barrett, WWF and Earth Resources Research Ltd, November 1989

[5] *Transport and the Environment*, Organisation for Economic Co-operation and Development, Paris, 1988

[6] *Transport Policy and the Environment: ECMT Ministerial Session*, ECMT/OECD, Paris, 1990

[7] 'Car Ownership Forecasting', J Adams, *Traffic Engineering and Control*, **31(3):**136-141, 1990

[8] 'Air Pollution: II Road Traffic and Modern Industry' and 'Noise: Breaking the Silence' both by F Godlee in F Godlee and A Walker (eds) *Health and the Environment*, British Medical Journal, London

[9] For example, *Transport, the Environment and Sustainable Development* D Banister and K Button (eds), E&FN Spon, London, 1994 and *Transport for a Sustainable Future: The Case for Europe* J Whitelegg, Belhaven Press, London, 1994.

[10] *Traffic Growth and the Dynamics of Sustainable Transport Policies* P Goodwin, Linacre Lecture, TSU, Oxford, October 1994

Table 2.1 Contents of the 18th Report

CH1: Scope of the report
Environmental problems caused by transport
CH2: Growth of mobility
CH3: Effects of vehicle emissions
CH4: Other major impacts of surface transport
CH5: Air transport
Approaches to a solution
CH6: Perspectives on transport policy
CH7: Economic aspects of transport
CH8: Road vehicle technology and performance
CH9: Transport and land use planning
Future policies towards transport
CH10: Freight transport
CH11: Local journeys
CH12: Long-distance transport
CH13: Institutional dimension of transport
An environmentally sustainable transport system
CH14: Conclusions and recommendations

From the perspective of the present day, when many of the 18th Report's conclusions have become received wisdom, it is perhaps difficult to recall the full impact of its publication. Aside from its specific messages, a large part of the significance of the report was that it was the first from a substantive scientific and official body to warn of the unsustainable trends in transport policy. Equally striking was that it presented a substantial challenge to then Government policy as outlined above, as there was little governmental concern for the broader environmental impacts of transport at that time, and environmental advocates and their arguments had achieved very little influence over government transport policy.

As a result, the impact of the 18th Report was quite fundamental to the terms of the environmental dimension of the transport policy debate. However, while the 18th Report was welcomed by environmental interests, it proved unpalatable to the Government of the day because it challenged many of the positions outlined in Section 2.1.1.

2.2 Development of the 20th Report

2.2.1 The Government Response to the 18th Report

In spite of the early signs of a more open approach around the time of the 18th Report, there was no stomach in government for addressing the broader effects of traffic growth itself, or for intervening directly to affect motorists' choices, even in the wake of the 18th Report. Furthermore, the government's enthusiasm for privatisation and deregulation of public transport rendered the subject of integration between transport modes and services anathema to it, and respective Secretaries of State tended to regard integration as a vague and unhelpful concept.

However, in 1995, Brian Mawhinney became Secretary of State for Transport, and he recognised that some elements of this policy were increasingly untenable (notably road building in the crowded south east of England). He therefore initiated the 'Great Transport Debate'. This was, arguably, partly in response to the 18th Report, and to

the SACTRA report on *Trunk Roads and the Generation of Traffic* which had followed soon after.

Then in April 1996, the then Government issued a Green Paper on transport entitled *Transport – The Way Forward: The Government's Response to the Transport Debate*. It is questionable whether this truly merited the title of Green Paper, in that it was a fairly insubstantial document which lacked detailed policy proposals. It was, nonetheless, relatively progressive in that it did recognise some of the issues raised in the 18th Report (for example noise and vehicle emissions), and marked some significant changes of tone from what had gone before. It also made frequent and fulsome references to the 18th Report, noting for example (in paragraph 2.2) that it 'ranged widely over the impact of transport on the environment and helped to get the transport debate off the ground'. The new Secretary of State, Sir George Young, was more environmentally aware than any of his predecessors and was therefore keen to insert some new messages from the 'Great Debate' into the Green Paper.

However, in his preface to the Green Paper, he stated that that the paper 'forms the Government's response to' the 18th Report[11]. It was established government practice, which had been followed for each of the Commission's previous reports, to respond formally and explicitly to each report, and to address its conclusions in some detail. The government responses had not always been especially prompt and did not always accept the Commission's arguments; but they were always formal and detailed. Clearly the Green Paper did not satisfy either of the latter criteria, and so the Commission was unwilling to accept it as the official governmental response to its 18th Report.

At its meeting of May 1996, therefore, the Commission agreed that the Chairman would make representations to the Secretaries of State for Environment and Transport, and if necessary to the Prime Minister himself, to seek a more satisfactory response and to clarify that this did not represent a change in government policy towards the Commission. The Commissioners also agreed at this meeting to the possibility of a follow-up report towards the end of 1996 if they did not receive a satisfactory response. Consequently, a letter was sent to the Prime Minister concerning the Government's failure to respond to the 18th Report, which concluded by stating that:

> 'Achieving a sustainable transport policy is an issue of such importance for the economy and the environment that we for our part also want to make a further contribution, in parallel with our current study into the future basis for environmental standards. I have discussed with George Young how we might best do that.'

In an exchange of letters which followed, the Prime Minister confirmed that the Government's response to the 18th Report did not represent a change from the established practice of responding to Commission reports 'formally and in detail'. This was later reiterated in a parliamentary written answer. However, it was clear in

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[11] *Transport – The Way Forward: The Government's response to the Transport Debate* CM3234, London: HMSO, page 5

spite of this emollient response that no further official response of the kind stipulated would be forthcoming to the 18th Report.

2.2.2   *Early Planning of the 20th Report*

Through the summer of 1996, the Commission developed its ideas as to the nature and content of a possible follow-up report. It was still planned to publish 'early in 1997', in order to avoid doing so in the immediate run-up to the election which would occur in 1997. This however would be a much shorter timetable than that of a usual Commission study (typically two and a half years), and so it seems to have been clear that it would need to be limited in various ways. Thus for example it was agreed at an early stage that the Commission would not seek formal evidence, but merely invite interested parties to send in relevant but pre-existing materials. It was also agreed that the Commissioners would not undertake visits, as this would reduce demands both on their own time, and on the workload of the Secretariat.

Some Commissioners felt that the new document should not be a formal report at all, but should take some other, shorter, form. The letter to the Prime Minister, and even the announcement of the 20th Report, refer only to a further 'contribution' to the debate, and did not therefore commit the Commission to producing a full report. However, there did not seem to be any consensus on an alternative format, and there were good reasons to stay with the usual format, as discussed later in this review.

It was quickly agreed that the new report should not respond directly to the Green Paper. To do so would run the risk of appearing to accept the Government agenda if the Conservatives were to stay in power; or of becoming quickly irrelevant if there were to be a change of government. An analysis of the extent to which the Green Paper met the conclusions and recommendations of the 18th Report was undertaken by the Secretariat during this period. The Labour Party's pre-election transport policy paper[12] was also circulated, and it was agreed at the Commission's June meeting that it too should be 'taken into account' in the drafting of the new report.

It was agreed that the new report should be in part a review of the 18th Report, possibly addressing the application in transport of a number of cross-cutting themes such as the polluter pays principle. It was also agreed that it should seek to address some of the criticisms of the 18th Report. As no formal response to the latter had been received from the Government, or now seemed likely to be received, it appears to also have been agreed early in 1997 that the new report would not include any formal recommendations.

The Commissioners' main consideration in coming to this decision appears to have been that making further recommendations when the government had failed to respond to the original recommendations would be an implicit acceptance by the Commission of the Government's failure to respond. There were also practical difficulties about relating any new set of recommendations to the 110 recommendations in the 18th Report. Current Members of the Commission (some of whom had joined since 1994) would not necessarily have agreed to endorse all of them en bloc, but working through them all again would be a time-consuming task,

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[12] *Consensus for change: Labour's transport strategy for the 21st century* Labour Party, London, May 1996

and might not easily lead to a positive result. To issue new recommendations might also have distracted attention from the fundamental issues raised in the 18th Report, which were essentially unchanged.

By October an initial outline had been agreed, with four chapters as follows:

1. Introduction and background
2. Broader context and themes
3. Measures to achieve an environmentally sustainable transport system
4. The role of government

In practice, however, as drafting of specific sections of the report proceeded from around this date, the broad thematic approach suggested proved impractical, and a more conventional, subject-based structure was adopted.

2.2.3   *Developing the Content of the 20th Report*

To assist the Commission in framing its report, Professor Philip Goodwin of University College, London, was commissioned to develop a paper summarising relevant developments since 1994, and to advise the Commission. He gave a presentation to the Commission on the basis of this paper, and attended a number of meetings during the early stages of the Report's development.

As time was limited and there would be a substantial amount of work to be undertaken, a Transport Working Group (TWG) was set up to develop the content of the new report. Membership of this group was determined primarily on the basis of the best informed and most interested members of the Commission, but a particular effort was made to ensure that the TWG would include both members who had played an active part in the 18th Report, and some who had joined subsequently, in order to give a fresh perspective.

The TWG first met in July 1996, and was to meet regularly thereafter (monthly or bimonthly) through the year of drafting that would follow. At its first meeting it identified seven main issues to be addressed:

- new forecasts of economic and traffic growth for both passengers and freight;
- the utility of targets to indicate the extent and direction of necessary change;
- the justification and scope for road pricing;
- the importance of packages of measures;
- air quality;
- fuel efficient vehicles; and
- investment to increase the use of railways and buses.

Through October and November 1996, several members of the Secretariat began drafting key sections of the proposed report, highlighting the critical issues which the TWG members would need to consider at their meetings. This sort of iterative process was to continue into the middle of 1997, when complete drafts were approved. As the scale of the task became clear, the initial timetable also slipped on several occasions.

The Secretariat compiled lists and summaries of the various materials submitted in response to the Commission's announcement of the new report for the use of the Members. This in itself was a substantial task. It does not appear that the Members themselves made systematic or substantive use of these materials, but there is clear evidence (including the number and content of the endnotes to the Report) that members of the Secretariat did. This was particularly so in some technical areas in which there had been significant developments since the 18th Report, such as air quality and noise.

It should be added that, although the Commission did not have formal evidence sessions, they did hold informal discussions with a number of key organisations and individuals. These included, for example, Railtrack; Professor David Begg; and Mr Michael Parker of Tyne and Wear Passenger Transport Executive. The Secretariat also had extensive contacts with experts who had submitted evidence, for purposes of clarification and further advice. In addition, the Secretariat was in regular contact with officials in a number of relevant government departments, and the latter were reported to have been particularly helpful.

It is not clear from the minutes of either plenary or TWG meetings of the Commission when or if the likely outcome of the election was explicitly discussed. However, by November 1996 it was recognised that it would be undesirable for the final publication to be much after the middle of 1997 if it was to have the maximum possible impact on the new government, whichever it was to be.

During the first half of 1997, when much of the basic text was drafted, it was presumably increasingly clear that the government audience for the Report would be a new one, and that it might have a very different reaction to the Commission's advice. From May onwards, when the election result was known, it is clear that the language of the text was progressively reworked to chime in where possible with the preoccupations of the incoming Government – notably towards promotion of public transport, and the better integration of transport systems. The latter had not been pressed as an objective of the earlier work of the Commission, as it appeared incompatible with the then Government's basic approach to transport provision.

It became clear that there would not be a major transport bill in the first session of the new parliament, and that a White Paper was planned for the spring of 1998. Hence a launch in the autumn of 1997 was, in the event, agreed to be timely. Late drafting explicitly took into account some of the new Government's early policy pronouncements in relevant fields, for example in referring in several places to the government consultation *What role for trunk roads in England? A consultation paper*. The Government's overarching invitation to contribute to the upcoming White Paper (*Developing an integrated transport policy: an invitation to contribute)* was not published until August and was not directly considered. However it was clear from officials that this would not be a substantive policy document, so it was not thought necessary to wait for its publication.

A further point to note was that, in the interest of a rapid publication, it was decided that the 20th Report would depart from normal practice by not including an index.

2.3   Reactions to the 20th Report

2.3.1   Sales of the Report

Around 1700 copies of the 20th Report have been sold. This is comparable to the average level of sales of other Commission reports, although significantly fewer than the approximately 8,000 copies of the 18th Report which were sold (counting both the Commission's own and Oxford University Press publications).

2.3.2   The Government Response

The Government published its response to the 20th Report in October 1998[13], which was three months after the publication of the Integrated Transport White Paper[14]. In its Foreword, the response describes the 20th Report as a 'valuable and very timely contribution' to the formulation of the Government's new transport policy and stated that, together with the Commission's 18th Report, it had made an important contribution to the Government's thinking on these issues. In the White Paper itself, the 20th Report was described as a 'comprehensive report on transport and the environment' and a summary of its main points was set out in an Annex. The government responses to the issues raised by the Commission in both of these reports is set out in Appendix I to this review, and summarised in Chapter 5.

2.3.3   Press response to the 20th Report

The Commission's 20th Report was launched, accompanied by a press release, at a press conference on 18 September 1997[15]. According to the Secretariat's records, this was attended by 63 people – a 50 per cent larger audience than has on average attended the launch of the Commission's other recent reports. Unfortunately, it is not possible to compare the numbers attending the launches of the 18th and 20th Reports, as the Commission has no record of the numbers attending the launch of the earlier Report.

The subsequent newspaper coverage of the 20th Report was fairly extensive, with some of the broadsheets devoting an article, as well as a news story, to the Report. The majority of the press coverage referred to the report as the second of the Commission's reports on transport or an 'update' of its 18th Report. The publication of a second report on transport and the environment just three years after the first was highlighted as an 'unprecedented action' in some reports. It was generally welcomed in the light of the continually increasing levels of traffic with the accompanying adverse effects on the environment and society as a whole. These trends were highlighted by the Commission's news release, which stated that 'time is running out to reverse the damaging trends associated with continuing growth in traffic and create the efficient transport system the UK needs'.

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[13] *Government Response to the Royal Commission on Environmental Pollution's Twentieth Report: Transport and the Environment – Developments Since 1994* Her Majesty's Government, Cm 4066, October 1998

[14] *A New Deal for Transport: Better for Everyone – The Government's White Paper on the Future of Transport* DETR, July 1998

[15] *Time is Running Out on Transport: Royal Commission sets out Requirements for Future Transport System* Royal Commission on Environmental Pollution news release, 18 September 1997

In launching the report, Sir John Houghton stated that there had been a great deal of 'talking' about the problem but little 'action' had been taken. As quoted by many of the newspapers, Sir John also stated that the 20th Report focused on action, and hence the Commission Members wanted it to form the 'backbone' of the new Government's proposed White Paper. This was underlined in the press release, which stated that the Report set out the 'requirements for the success of the integrated transport system' which the Government proposed to establish. However, the issue that received the most attention in the press, and took the most headlines, was the 'expected' government action on taxation required to achieve a sustainable transport system, rather than the call for a more integrated system.

A number of the newspaper reports claimed that the 20th Report called for a 'doubling of petrol prices in ten years', and this formed a part of several headlines. Ironically, however, this was not actually advocated in the 20th Report, rather it had been a proposal of the 18th Report to which the 20th had referred. Nevertheless this issue dominated the headlines and was the focus for many of the newspaper stories. The issue of 'cleaner and more efficient vehicles' was the second most popular to be covered by the press. Here, the focus was on the 'macho car culture' promoted by the car manufacturers and the increase in the use of larger cars, such as four-by-fours and people carriers, in urban areas. The 20th Report had highlighted the problems associated with the growing demand for larger vehicles and proposed policies to encourage the use of smaller cars. The main concern in this respect was the fuel consumption of the larger vehicles, and press reports discussed the proposed measures to address this such as a graduated vehicle excise duty and differential road use charges, which were generally interpreted as 'higher taxes for larger vehicles'. This was another topic of debate in the press, with counterviews from the car industry and its representatives also included.

With taxation (fuel duty, VED or road charges) dominating the headlines, other issues such as 'planning for an integrated transport system' and the 'need for more effective institutions' received little newspaper attention. 'More effective institutions' was one of the issues highlighted by the Commission's press release, as was 'creating an integrated transport system', 'cleaner and more efficient vehicles' and 'incentives and market signals'. The latter two received some press attention, however the reporting was often not well informed. The proposals for road use and non-residential private parking charges, and *vignette* requirements from heavy goods vehicles, also received some attention.

The general expectation of the press was that the proposals of the 20th Report would be included in the then forthcoming transport White Paper. This idea was also reflected in the statements of John Prescott, who also called for a 'radical change'. However, there was no reported statement of direct support from the Government although the Report was said to be 'welcomed'.

The reaction in the specialist press which we reviewed was significantly more balanced and a much fuller treatment was given to the discussion in the 20th Report. Both the *ENDS Report* and *Local Transport Today* provided an overview of the history behind the report and a general commentary on the report itself before addressing in turn the principal issues raised. The *ENDS Report* devoted a page of its

September 1997 issues to the report, while *LTT*'s issue of 25 September 1997 contained a double page feature.

3 Labour Party Transport Policy in 1996 to 1997

The Labour Party published its policy statement on transport *Consensus for change - Labour's transport strategy for the 21st century* in June 1996. This appeared shortly after the publication of the Green Paper on transport by the then Conservative government, and some months before the Commission's announcement of the review of its 18th Report. It reflected the main issues which were then on the political agenda (as discussed in Section 2.2.1), starting with the forecasts of traffic growth. It defined the framework of a national transport strategy based on six principles: *accessibility, economic development, efficiency, environmental sustainability, equity,* and *health and safety*. The Labour Party planned to implement this strategy through two distinct components; a broad strategy which would look ahead for 20 years and set a framework around national transport goals, and five-year rolling programmes at national, regional and local levels with the aim of putting the strategy into action. This reflected the Labour Party's intention of transferring more power over transport policy to local authorities. The importance of regional planning in relation to transport was also highlighted in this context, together with the proposals for the development of a Scottish Parliament and a Welsh Assembly.

Building on the objectives and principles of its transport strategy, Labour intended to establish a transport policy covering the broad areas of *integrated transport, road transport, public transport*, and *freight*.

3.1 Integrated Transport

Under integrated transport, the emphasis was on integration in all aspects of the transport system, including between policy areas, between modes and between different parts of the country. In this report it highlighted the importance of integrating transport and land use planning, as well as ticketing and information on public transport. It also discussed shifting the balance of costs from car ownership to car use, through economic incentives such as road pricing. It also undertook to consider the graduation of vehicle excise duty and company car taxation. The importance of giving power to local authorities to use the revenues collected from parking, road use and other charges to invest in public transport was also underlined.

3.2 Road Transport

With respect to *road transport*, Labour argued for a shift from the 'predict and provide' approach to an 'integrated thinking' about road use, with implementation at the local level. The strategy also highlighted the importance of working together with the automotive industry to encourage the development of more fuel efficient vehicles.

3.3 Public Transport

In relation to *public transport policy*, the strategy argued that both privatisation and deregulation had had severe adverse effects on public transport. Although the Labour Party clearly stated that it had no proposals to repurchase the privatised parts of the rail network, it had plans to keep British Rail as a publicly owned company by ending the franchising process, and to improve the quality of the service, especially through high levels of investment in new rolling stock. It also raised the possibility of acquiring the ownership of Railtrack. Other issues such as safety, links to other modes and high-speed rail links to Europe and within the UK were also covered. For buses, the main issue was deregulation, and a new regulatory system was proposed. Improving the quality of the services and access to rural areas was also highlighted as important. Regulation was identified as an area of concern for taxis and private hire vehicles.

3.4 Freight Policy

The basic proposals covered under *freight* included the development of policies to support the use of rail, coastal shipping and inland waterways for freight transport; consideration of a structure of road taxation for lorries; shifting rail subsidy from operators to the infrastructure; the development of a national 'piggyback' freight network; regional terminals linked to the Channel Tunnel; shifting more long-distance and international freight traffic to containers which can easily be transferred from lorry to train or ship; and reviewing the restrictions on the use of 44-tonne lorries.

3.5 Private Finance for Transport

The Labour Party considered *private-public partnerships* (PPPs) as a major source of revenue for the national transport system. This new approach to funding was clearly identified as being different to the Private Finance Initiative (PFI) which had been developed by the Government of the time. The Labour Party argued that PFI relied on the notion that the private sector can take over the role of the government. However, the policy paper emphasised that the government should have the central role of setting the framework and then enabling the provision to be privately funded. This is the idea behind PPPs in which public policy aims are central to the initiative. The PPPs were also expected to involve a sharing of responsibility while at the same time a fair sharing of risk.

This part of the review deals with developments since the 20th Report, as this is an essential element in assessing the overall effectiveness of the Report. It begins with an analysis of the extent to which the objectives and targets from the 18th Report have been achieved, and goes on to address policy developments since 1997 against the headings of the 20th Report[16].

4 Performance relative to the Objectives and Targets of the 18th Report

4.1 Introduction

This chapter deals in summary with the extent to which the objectives and targets of the 18th Report have either been met, or appear likely to be met. The 18th Report set out a list of eight objectives which, in their view, were necessary for a sustainable transport policy. It also set out a number of quantified targets, in order to measure progress towards six of these objectives. This section summarises, with some commentary, the progress which has been made with respect to the objectives and targets proposed in the 18th Report. The full analysis can be found in Appendix II to this review.

4.2 Progress towards Meeting the Objectives and Targets

Objective A: To ensure that an effective transport policy at all levels of government is integrated with land use policy and gives priority to minimising the need for transport and increasing the proportions of trips made by environmentally less damaging modes

The publication of the Integrated Transport White Paper, followed by the development of Regional Transport Strategies and Local Transport Plans (see Table A6-1 in Appendix I), was a significant step forward in terms of integrating transport and land use policy at all levels of government. When PPG13 was revised in 1994 to set out how local authorities should integrate transport and land use in their development plans, it was welcomed as an important step to achieving such integration at the local level. However, the White Paper and the subsequent developments, including a revision of PPG13, took this integration further. Regional Transport Strategies are to be included in Regional Planning Guidance, while each local transport authority must prepare an LTP to promote and encourage integrated transport facilities and services. On the other hand, the proposed abolition of the current system of development plans, as set out in the Government's recent planning Green Paper, risks undermining at least the integration of transport and land use policies.

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[16] When this review was undertaken, ie in the first quarter of 2002, few analyses of UK transport policy developments since 1997 had been undertaken. However, subsequently, a number have been produced, eg House of Commons Transport Select Committee's report on the 10 Year Plan (http://www.publications.parliament.uk/pa/cm200102/cmselect/cmtlgr/558/55802.htm) and the Commission for Integrated Transport's first assessment of the same plan (http://www.cfit.gov.uk/research/10year/index.htm). The conclusions of these are broadly in line with those this review. For these two reasons, therefore, these reports are not mentioned further in this section.

Objective B: Achieve standards of air quality that will prevent damage to human health and the environment

> **Target B1:** To achieve full compliance by 2005 with World Health Organisation (WHO) health-based air quality guidelines for transport-related pollutants

Of the main transport-related pollutants, WHO has set health-related guideline values for all but particulates. The Government's objectives for air quality, as set out in the 2000 Air Quality Strategy for England, Scotland, Wales and Northern Ireland[17], are in line with the target of achieving full compliance with WHO health-based air quality guidelines by 2005. For carbon monoxide, the objective set by the 2000 Air Quality Strategy is above the WHO guideline, but a proposed change would bring it into compliance with the WHO guideline by 2005[18]. For particulates, the Government has set objectives in the absence of WHO guidelines, and the proposed revisions to the 2000 Air Quality Strategy set different targets for three different regions in the UK.

The objectives set by the Government in accordance with the WHO guidelines are likely to be met by 2005 for benzene, carbon monoxide, ozone and lead, whereas expected reductions in levels of nitrogen oxides emissions may not be enough for the UK to meet the objective for this pollutant in all areas. Similarly the attainment of the Government's own objectives for particulates is not assured, especially in urban areas.

> **Target B2:** To establish in appropriate areas by 2005 local air quality standards based on the critical levels required to protect sensitive ecosystems

Ecosystem-based objectives for nitrogen oxides and sulphur dioxide have already been set in the 2000 National Air Quality Strategy and an objective for ozone is expected to be set soon. However, these are national objectives measured over a year. Locally, levels of nitrogen oxides and ozone do reach levels that potentially damage ecosystems, particularly in areas affected by high seasonal traffic flows. At present, there is no active consideration of local air quality standards to protect such ecosystems.

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[17] *The Air Quality Strategy for England, Scotland, Wales and Northern Ireland: Working together for Clean Air*, DETR et al, January 2000
[18] *Tough New Targets for cutting Air Pollution - Meacher* DEFRA PR 137/01 of 17 September 2001

Objective C: To improve the quality of life, particularly in towns and cities, by reducing the dominance of cars and lorries and providing alternative means of access

> **Target C1:** To reduce the proportion of urban journeys undertaken by car from 50% in the London area to 45% by 2000 and 35% by 2020, and from 65% in other urban areas to 60% by 2000 and 50% by 2020

The 2000 target set for the London area has not been achieved as the modal share of cars has not dropped significantly in the capital. In other urban areas, the target was nearly met, as the car's modal share stood at 60.3 per cent in 2000. However, as car ownership continues to increase and car use is not decreasing, meeting the targets for 2020 might prove difficult.

> **Target C2:** To increase cycle use to 10% of all urban journeys by 2005, compared to 2.5% now, and seek further increases thereafter on the basis of targets to be set by the government

There has been a decline in cycle use in urban areas compared to the 1994 figures. This decline seems to be continuing. The target for 2005, which is nearly ten times the current level of cycle use, is not therefore likely to be met.

> **Target C3:** To reduce pedestrian deaths from 2.2 per 100,000 population to not more than 1.5 per 100,000 population by 2000, and cyclist deaths from 4.1 per 100 million kilometres cycled to not more than 2 per 100 million kilometres cycled by the same date

For overall pedestrian deaths, the 2000 target has been met, but there is still concern about the high levels of child casualties. However, cyclist fatalities were 50 per cent above the target. The Government's 10 year plan[19] set a target of further reducing the number of all transport users killed or seriously injured in road accidents by 40 per cent between 2000 and 2010.

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[19] *Transport 2010: The 10 Year Plan* DETR, July 2000 (http://www.dtlr.gov.uk/trans2010/index.htm)

Objective D: To increase the proportions of personal travel and freight transport by environmentally less damaging modes and to make the best use of existing infrastructure

> **Target D1:** To increase the proportion of passenger-kilometres carried by public transport from 12% in 1993 to 20% by 2005 and 30% by 2020

There has been a slight increase in the modal share of all modes of public transport between 1993 and 2000, but the rate of increase is not sufficient to achieve the 2005 target. In this context, an outstanding improvement would also be needed to achieve the 2020 target. The Government has, in its Ten Year Plan, set a target of increasing the level of passenger kilometres on the rail network by 50 per cent between 2000 and 2010, and increasing the number of journeys undertaken by bus by 10 per cent over the same period. However, it is likely that the achievement of these targets by 2010 would still mean that public transport's modal share that year would still be less than the Commission's target for 2005.

> **Target D2:** To increase the proportion of tonne-kilometres carried by rail from 6.5% in 1993 to 10% by 2000 and 20% by 2010

The actual figure for 2000, which is slightly above the 1994 figure, is well below the 2000 target. In its Ten Year Plan, the Government set a target of increasing the amount of freight transported on the railways by 80 per cent between 2000 and 2010. However, even if this target is met, it is likely that rail's modal share in 2010 would be significantly lower than the Commission's proposed target for that year. Consequently, it will take a significant improvement in trend for the Commission's target for 2010 to be met.

> **Target D3:** To increase the proportion of tonne-kilometres carried by water from 25% in 1993 to 30% by 2000, and at least maintain that share thereafter

There has not been any net increase in the amount of freight transported by water since 1994. The figure for 2000 is the same as the 1994 figure, and hence well below the 2000 target.

Objective E: To halt any loss of land to transport infrastructure in areas of conservation, cultural, scenic or amenity value unless the use of the land for that purpose has been shown to be the best practicable environmental option

The concept of BPEO has not been taken up in the transport sector in the way in which the Commission intended, so it could be considered that the objective has by definition not been met. Beyond this, it is clear that road building continues to have impacts on important sites, but it is not possible to say whether the land of scientific

or conservation value that has been, or is to be, lost to roads is consistent with the application of the BPEO.

Objective F: To reduce carbon dioxide emissions from transport

> **Target F1:** To reduce emissions of carbon dioxide from surface transport in 2020 to no more than 80% of the 1990 level

A forecast of carbon dioxide emissions from surface transport undertaken by the DTI suggests that emissions from transport will continue to increase up to 2020. In contrast, a DTLR analysis in support of the Ten Year Plan, which only covered the period from 2000 to 2010 suggested a slower rate of increase in this period and a possible decrease if certain policy measures were fully implemented. However, even in the DTLR's best case scenario, significantly more would need to be done to meet the Commission's target for 2020.

> **Target F2:** To limit emissions of carbon dioxide from surface transport in 2000 to the 1990 level

The actual figures for 2000 are not yet available, but, even though emissions from surface transport are now decreasing, there would have had to have been a significant drop in emissions in 2000 for the Commission's target to have been met.

> **Target F3:** To increase the average fuel efficiency of new cars sold in the UK by 40% between 1990 and 2005, that of new light goods vehicles by 20%, and that of new heavy duty vehicles by 10%

The target set by the voluntary agreement that has been agreed between the European Commission and manufacturers for passenger cars is significantly less demanding than the Royal Commission's proposed target. Although the EU as a whole is on track to meet the voluntary agreement target, the UK is lagging behind. Indeed, the UK now has the second highest average new car emissions level of any Member State, and will need to improve significantly on recent performance if it is to keep pace with the 2008 target set by the voluntary agreement. The DTLR has confirmed that there are insufficient data to assess conclusively whether there have been improvements in the fuel efficiency of light goods and heavy duty vehicles since 1990, but on the basis of underlying trends it appears unlikely that these targets will be met.

Objective G: To reduce substantially the demands which transport infrastructure and the vehicle industry place on non-renewable materials

> **Target G1:** To increase the proportion by weight of scrapped vehicles which is recycled, or used for energy generation, from 77% at present to 85% by 2002 and 95% by 2015

The proportion of scrap vehicles that is being reused or recycled has increased in recent years and the Commission's target for 2002 could well be met. However, UK industry has expressed concerns that meeting the targets, which are in line with the EU's end-of-life vehicles Directive, will be difficult, as a result of technical problems and a lack of incinerator capacity in the UK.

> **Target G2:** To increase the proportion of vehicle tyres recycled, or used for energy generation, from less than a third at present to 90% by 2015

While the target is challenging, there has been a significant improvement in recent years and a ban on the disposal of scrap tyres in landfill under an EU Directive may even result in the target being met earlier than 2015.

> **Target G3:** To double the proportion of recycled material used in road construction and reconstruction by 2005, and double it again by 2015

The Highways Agency has confirmed that no information exists to determine whether this target is likely to be met, as figures only exist for the use of recycled material as aggregate for construction as a whole. However, the use of recycled materials as aggregate for construction in general is increasing.

Objective H: To reduce noise nuisance from transport

> **Target H1:** To reduce daytime exposure to road and rail noise to not more than 65 $dBL_{Aeq.16h}$ at the external walls of housing
>
> **Target H2:** To reduce night-time exposure to road and rail noise to not more than 59 $dBL_{Aeq.8h}$ at the external walls of housing

There is insufficient information to assess whether these targets have been met, as there was no new national noise survey undertaken until recently and the results of this have not yet been published.

4.3 Summary and Conclusions

The targets proposed by the Commission in its 18th Report have in most cases not been met or are not on course to be met (see Table 4.1). This is particularly the case with the targets relating to modal shift both in the freight and passenger sectors. Probably the most notable success will be in relation to air quality where most WHO health-based standards are likely to be met by 2005. Pedestrian casualties in accidents have also been reduced in line with the Commission's proposed target. Positive developments have also taken place in terms of integrated transport and land use planning with the introduction of Local Transport Plans and Regional Transport Strategies and a revised PPG13, but proposals set out in the Government's recent planning Green Paper could undermine these developments. In relation to carbon dioxide emissions from transport, the overall increasing trends in the sector appear to have at last been curbed, but stronger measures would be necessary in order to meet the Commission's medium-term target for transport CO_2 reduction.

Table 4.1: Summary of Progress towards Targets of the 18th Report

Target	Progress
B1: To achieve full compliance by 2005 with World Health Organisation (WHO) health-based air quality guidelines for transport-related pollutants	Likely to be met for most pollutants
B2: To establish in appropriate areas by 2005 local air quality standards based on the critical levels required to protect sensitive ecosystems	Not under active consideration
C1: To reduce the proportion of urban journeys undertaken by car from 50% in the London area to 45% by 2000 and 35% by 2020, and from 65% in other urban areas to 60% by 2000 and 50% by 2020	2000 target for London not met; 2000 target for other urban areas nearly met; meeting 2020 targets might prove difficult
C2: To increase cycle use to 10% of all urban journeys by 2005, compared to 2.5% now, and seek further increases thereafter on the basis of targets to be set by the government	Not likely to be met, as cycle use in urban areas is declining
C3: To reduce pedestrian deaths from 2.2 per 100,000 population to not more than 1.5 per 100,000 population by 2000, and cyclist deaths from 4.1 per 100 million kilometres cycled to not more than 2 per 100 million kilometres cycled by the same date	Target for reducing pedestrian deaths met; target for reducing cyclist deaths was not
D1: To increase the proportion of passenger-kilometres carried by public transport from 12% in 1993 to 20% by 2005 and 30% by 2020	Increasing, but a faster rate is needed to meet 2005 and 2020 targets
D2: To increase the proportion of tonne-kilometres carried by rail from 6.5% in 1993 to 10% by 2000 and 20% by 2010	2000 target not met; significant improvement needed to meet 2010 target
D3: To increase the proportion of tonne-kilometres carried by water from 25% in 1993 to 30% by 2000, and at least maintain that share thereafter	2000 target not met
F1: To reduce emissions of carbon dioxide from surface transport in 2020 to no more than 80% of the 1990 level	Not likely to be met on current projections
F2: To limit emissions of carbon dioxide from surface transport in 2000 to the 1990 level	Not likely to have been met in 2000
F3: To increase the average fuel efficiency of new cars sold in the UK by 40% between 1990 and 2005, that of new light goods vehicles by 20%, and that of new heavy duty vehicles by 10%	Figure for cars not likely to be met on current projections; insufficient data to assess progress for other vehicles
G1: To increase the proportion by weight of scrapped vehicles which is recycled, or used for energy generation, from 77% at present to 85% by 2002 and 95% by 2015	Increasing, but technical and incinerator capacity problems might make meeting targets difficult
G2: To increase the proportion of vehicle tyres recycled, or used for energy generation, from less than a third at present to 90% by 2015	Significant recent improvements and target may well be met before 2015
G3: To double the proportion of recycled material used in road construction and reconstruction by 2005, and double it again by 2015	No information exists to determine whether target might be met
H1: To reduce daytime exposure to road and rail noise to not more than 65 dBL$_{Aeq.16h}$ at the external walls of housing	No information exists to determine whether target might be met
H2: To reduce night-time exposure to road and rail noise to not more than 59 dBL$_{Aeq.8h}$ at the external walls of housing	No information exists to determine whether target might be met

5 Analysis of Policy Developments since the 20th Report

5.1 Introduction

This chapter deals in summary with the central question for this report: how did the Government respond to the main points raised by the 20th Report? The sections which follow summarise, with some commentary, the analyses for each chapter which are found in Appendix I. The tables contained in this Appendix map the discussion of the 20th Report to the Government's response and other policy documents (such as the White Paper) and identifies whether progress has been made on the ground as a result of these policies. This section does not attempt to identify whether the 20th Report actually had any influence on government policy, as this question is addressed in Part IV of this review.

5.2 *Cleaner and More Efficient Road Vehicles*

The Government's response to the issues raised by the Commission on cleaner vehicles has been rather mixed. In terms of coverage of the issues in its formal response and other documents, the response can be seen to have been quite complete, but follow-up has been very good in some areas, and less so in others.

The Government's response in terms of setting appropriate air quality standards has in most cases been positive, although in many cases this is only a reflection of the requirements of the EU air quality 'daughter' Directives.

Differentiated taxation has been deployed more strongly in the transport sector than in any other, and many changes have been made in line with the Commission's ideas in relation to fuel quality and vehicle CO_2 emissions. Differentiating fuel taxation has been particularly effective in stimulating a rapid switch to ultra-low sulphur fuels. VED on cars is now differentiated according to fuel consumption/CO_2 emissions, but the degree of differentiation is relatively slight. The new system of company car taxation, in contrast, offers a strong differentiation on the basis of CO_2 emissions, and may prove to be a strong driver that will help to improve a thus-far rather lacklustre performance on car fuel economy. A cautious approach to diesel cars has been maintained. In contrast, the high degree of differentiation of HGV VED (largely reflecting track costs, but also regulated pollutant emissions) was watered down in the aftermath of the fuel crisis of autumn 2000.

In spite of more stringent regulated emissions standards now agreed for new cars from 2005, the differential between petrol and diesel standards, of which the Commission was critical, still persists. On the other hand, the UK can claim credit for its role in the establishment of unexpectedly stringent Stage IV limits for heavy diesels, particularly with respect to NO_x and particulates.

The new Government took an active interest in alternative fuels, but this focused mainly on LPG cars, and the high costs of CNG buses remained a barrier to their promotion. More recently the Government has adopted a more strategic stance in its consultation on *Powering Future Vehicles*. The Cleaner Vehicles Task Force was not particularly effective in setting new priorities or a strong agenda. It did produce a

useful publication on the environmental impacts of different vehicle types[20], but this was not widely distributed. Other public information campaigns have not been especially well targeted to transport behaviour.

There have been rapid developments in the deployment and use of speed cameras, although this policy has recently encountered strong opposition and there have been moves to soften the policy as a result. Roadside testing of vehicles has proceeded rather slowly, and some key obstacles have not yet been resolved.

5.3   Countering Noise

The 20th Report argued that there was no evidence that the problem of noise was diminishing and that it may in fact be increasing. In the White Paper the Government acknowledged that noise was potentially an increasing problem and set out a number of measures which it planned to undertake in order to address concerns over noise. These included updating the National Noise Incidence and National Noise Attitude Surveys, which were last undertaken in 1990 and 1991, respectively. These have now been completed and are due for publication in May 2002.

The production of a first noise map for a part of the United Kingdom (Birmingham) was concluded in February 2000 and the Government is planning to fund the development of noise maps in other areas in the UK. A consultation on a National Ambient Noise Strategy was launched in November 2001, which has only recently closed. The proposals include the identification of where noise is a problem, how the effects of this noise might be assessed, and the techniques available to improve the situation. This would be followed by an evaluation of the options for improvement before the development of a National Ambient Noise Strategy. Some experts have been critical of the proposals, arguing that they do not constitute a strategy and are driven primarily by the requirements of EU legislation.

The UK proposals do indeed mirror to a large extent the contents of an EU Directive, which has now been agreed and which will provide a framework for the harmonisation of noise measurement at the European level and a basis for action to be taken on noise at the national and local levels. It will require the production of noise maps for large urban areas and major transport infrastructure and require the development and implementation of action plans to address any noise problems that are identified. It may also be a vehicle for further EU legislation to reduce noise from particular sources. The UK Government consulted on the proposed Directive and received overwhelming support for the general principles outlined therein.

With respect to the noise generated from the contact between vehicles and the surfaces on which they operate, there has been progress with respect to road transport. At the European level, a Directive has been agreed, which, for the first time, sets limits on the noise arising from the contact between road surfaces and tyres when a vehicle is in motion[21]. Domestically, the Highways Agency has set a target to increase the number of trunk roads with quieter road surfaces and has a budget for noise

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[20] *Environmental impacts of road vehicles in use: Air quality, climate change and noise pollution*
Cleaner Vehicles Task Force, DETR, July 1999
[21] Directive 2001/43/EC, OJ L211, 4.8.2001

mitigation measures. However, with respect to rail, discussions are still ongoing at the European level as to what action should be taken.

5.4   *Getting About in Other Ways*

As regards encouraging the use of other modes, the main points of the Commission's 20th Report were that more could be undertaken to encourage the use of other modes for particular journey types, eg journeys to and from work and school; and that privatisation and deregulation have generally had negative effects on public transport. Either explicitly in its response to the Commission's 20th Report, or implicitly in its policy responses set out in the White Paper, the Government appears to agree with many of the comments in the 20th Report with respect to encouraging the use of modes other than the car.

In the White Paper, in particular, a number of initiatives were discussed to encourage the use of other modes for journeys to work (eg Green Travel Plans) and journeys to school (eg 'Safe Routes to School'). The endorsement of these at the national level was a significant step forward and added legitimacy to policies which were often already being taken forward at the local level. However, the take up of many of the initiatives has been variable, and where schemes have been put into action, they have not always been as effective as had been hoped.

The Government's policy responses towards the promotion of walking and cycling again revealed a general acceptance of the need for more proactive approaches to encouraging these means of transport. Guidance has been produced for local authorities on how to promote the use of these modes in their Local Transport Plans (LTPs), including the development of strategies aimed to increase cycling and walking. Again, the endorsement and production of guidance by central Government to promote these modes is a positive step forward, but here too, the practical effect of the policies has not been significant, although recent developments in relation to walking have been positive.

Similarly on the promotion of public transport, the Government has included guidance in the information that it has produced for local authorities to help them with the development of their LTPs. The Government's main substantive response to address the problems resulting from the privatisation and deregulation of the bus industry was to put Quality Partnerships, which were already being developed voluntarily in some areas, on a statutory footing. It also gives local authorities the powers to enter into Quality Contracts with local operators in order to improve services if all other means have failed. However, while the strategic instruments are now arguably in place (LTPs etc), the practice has been lacking and Quality Partnerships and Contracts are not considered to have been particularly effective to date.

The Government has addressed a number of the Commission's concerns over railways, such as the creation of the Strategic Rail Authority to oversee the network and the enhancement of the powers of the Rail Regulator. Passenger numbers are increasing, and the quality of the rolling stock has seen a significant improvement as a result of increased investment. The quality of the infrastructure has also improved in some areas, but not at the same rate. The public image of the railways in terms of quality, safety and reliability has been damaged as a result of the Hatfield crash and

the subsequent interruptions to service; the controversy surrounding the fate of Railtrack; and recent industrial disputes.

The Government has also attempted to address the underinvestment in the national transport system by setting out a Ten Year Plan to fund improvements. This plan contained a number of targets for the transport sector, including some to increase the use of public transport. An extra £18 billion over 10 years was allocated to local transport, bus services, road maintenance and railways, although some of this will come from the private sector. In order to address local authorities' previous concerns with the short-term approach to local transport funding, the annual spending round was abolished to make way for a three year spending plan to give greater certainty to local authorities in planning and managing their transport plans.

Overall, many of the measures to encourage the use of transport modes other than the car are in line with the spirit of the discussion in the Commission's 20th Report. However, while the strategic framework is now arguably in place, the delivery has not yet been very effective in spite of recent positive signs over walking and railways.

5.5 *Reducing the Impact of Freight Movement*

In its 20th Report, the Commission noted that the two principal ways to reduce the environmental impact of freight were to reduce freight intensity and to shift freight away from roads to less environmentally-damaging modes. The Government has taken, or is planning to take, action on the taxation of road freight to encourage environmentally less damaging behaviour (see Section 5.6). However, no progress has been made in relation to increasing the modal share of rail and water in the freight sector (see Section 4.2). As against this, in its Ten Year Plan for transport the Government did set an ambitious target of increasing the amount of rail freight by 80 per cent between 2000 and 2010.

The Commission's 20th Report, however, did not have much to say on more specific policies in the freight transport sector. In its response to the Commission's report, the Government also focussed more on general issues, such as the creation of the right conditions for the revival of rail freight, rather than on specifics. On one of the specific issues on which there has been policy movement, the unconditional acceptance by the Government of 44-tonne lorries went against the Commission's view that these should be restricted by use and road type.

5.6 *Making Best Use of Roads*

The incoming Government did initially increase the Fuel Duty Escalator to 6 per cent per annum, but not to the levels envisaged by the Commission in the 18th Report. In the face of fuel price rises and protests in September 2000, however, the escalator was first frozen and then, in effect, put into reverse. As a result of this and the cuts in HGV VED (see Section 5.2), heavy goods vehicles are presumably now paying a lower proportion of their track and other external costs than previously.

The Government rejected the idea of a vignette, concluding that it would 'add very little' to current tax arrangements. The low ceiling imposed by the eurovignette Directive limits the degree of effect that it can have, but the Treasury now appears to be showing greater enthusiasm for a distance-based road charging system. More

broadly, local authorities have been given the powers to introduce both congestion charging and workplace parking levies. However, individual local authorities have been reluctant to be the first to act, with the notable exceptions of London, where the Mayor is vigorously championing an ambitious congestion charging scheme, and Durham.

There have been some advances in assessment methods and criteria for road schemes, but the concept of Best Practicable Environmental Option (BPEO, as called for in the Commission's 20th Report) has not been taken up in the transport sector. Government policy towards road building has been variable with an initial moratorium (see Table 5.1) followed by a return to a more extensive programme than the Commission felt to be desirable.

Table 5.1: New trunk road and motorway construction and improvement (starts) in England

Year	1990/1	1991/2	1992/3	1993/4	1994/5	1995/6	1996/7	1997/8	1998/9	1999/0	2000/1
Route kilometres	263	196	117	213	79	6	159	0	10	20	10
Lane kilometres	1024	836	467	947	28	50	839	0	65	126	95

Source Table 3.18, Transport Statistics Great Britain 2001, DTLR and personal communication for latest figures

5.7   *Planning for an Integrated Transport System*

In its 20th Report, the thrust of the Commission's argument on planning for an integrated transport system was the need for 'new machinery' at the local and regional levels to set the framework for the implementation of an integrated transport system.

The Government accepted the Commission's conclusions that the focus of an integrated transport system should be at the local level and has made the Local Transport Plans (LTPs) the centrepiece of its approach to integrated transport policy in England. As a result of devolution, the administrations in Scotland, Wales and Northern Ireland were free to implement separate arrangements and have developed their own programmes accordingly (see below). LTPs cover all modes and in bidding for funds from central Government, local authorities will have to show that projects fit the objectives of the plan and that they have considered alternatives to major new construction. The plans will cover a five-year period and local authorities will have to submit an annual progress check to the DTLR.

The Government also effectively agreed with the Commission's view that more specific and firmer coordination of transport and land use policies was needed at the regional level. The requirement to include a regional transport strategy in each RPG, which will also provide the framework for local transport plans, should contribute to a better regional integration of transport and land use policies.

The Government's response to the Commission's 20th Report stated that:

> 'The Government remains committed to the plan-led system of development. This provides the essential framework for rational and consistent planning decisions, and plays a vital role in promoting development and growth which respects the environment.' (para 98)

This appeared to suggest that the Government supported the existing development plan system, but it did note that for this to work properly plans would have to exist to cover all parts of the country. Together with the commitment to revise and strengthen the Planning Policy Guidance Notes addressing development plans (PPG12) and transport (PPG 13), the Government therefore appeared to be committed to a plan-led system to integrate transport and land use policies. However, the proposals set out in the recent planning Green Paper, in particular the abolition of the existing development plan system, could potentially undermine the integration of transport and land use policies.

6 Transport Policy in the Devolved Administrations

6.1 Background

In 1998, responsibility for a wide range of policies, including transport and environment, was devolved to regional administrations in Scotland, Wales and Northern Ireland in the form of the Scottish Parliament and Welsh and Northern Ireland Assemblies. However, the level of responsibility varies depending on the issue and administrative area. A Memorandum of Understanding, which is a non-legal statement of political intent, was agreed by UK, Scottish, Welsh and Northern Irish Ministers which sets out the principles governing relations between the devolved administrations. The Memorandum includes separate, but similar, 'Concordats' between the DTLR and the Scottish, Welsh and Northern Irish authorities on the co-ordination of policy issues.

The Integrated Transport White Paper was a UK document, although some of the discussion applied solely to England. However, the guiding principles are relevant throughout the UK and the devolved administrations were expected to develop their transport policies accordingly. Consequently, the general frameworks of the regional strategies are almost identical to the UK strategy, but they have their own planning and strategic documents, objectives, and targets which sometimes differ from the ones set out in the UK White Paper. The framework upon which the integrated transport policy in Scotland is built stemmed from a UK Government document, *Travel Choices for Scotland: The Scottish Integrated Transport White Paper* published in July 1998 by the Scottish Office. In Northern Ireland, the equivalent document was *Moving Forward*, published by the Department of the Environment for Northern Ireland later that year, while in Wales, no document equivalent to the White Paper was published.

Scottish transport policy has subsequently been updated with the publication of *Scotland's Transport: Delivering Improvements*, by the Scottish Executive in March 2002, while in Northern Ireland a draft *Regional Transportation Strategy for Northern Ireland* was published in February 2002. Both of these are closer in content to the Ten Year Plan than the UK White Paper. In Wales, the only strategic transport policy document is *The Transport Framework for Wales* published by the National Assembly for Wales in November 2001.

6.2 Strategies and Targets

Each devolved administration varies in its approach to the development of strategies and targets. For example, the Scottish Executive has stated that it will 'strive' to stabilise traffic levels at 2001 levels by 2021, which goes further than the UK position, where no equivalent target has been set. The Welsh Assembly accepted the UK Government's target to increase by 80% the amount of freight moved by rail and to improve the efficiency and quality of road freight. In Northern Ireland, there is a range of targets, to be achieved by 2012, covering the buses, rail and construction of highways, as well as a different target for cycling, as set out in the Northern Ireland Cycling Strategy.

6.3 Differing Priorities

While covering the same general issues, each devolved strategy emphasises slightly different aspects, especially tailoring different modes of transport to regional transport needs and geographical conditions. Although public transport within the perspective of integrated transport is at the centre of transport strategies, all regions still have projects to build new highways and trunk roads as well as improving the existing ones. Local buses are considered to be the principal option for rural transport, especially in remote areas. They also give high priority to air transport and its integration to other modes of transport, because of the need to have easy access to other regions in the UK and to other countries. Rail is regarded as an important mode of transport for all regions – managed via regional franchises controlled by the SRA.

In the Scottish strategy, accessibility within the country is discussed with a high priority given to public transport. Urban public transport systems are covered in relative detail, and specific emphasis is given to access to surrounding islands and hence ferries are also important. Unlike the Welsh and Northern Irish strategies, the relevant transport-related climate change and air quality strategies are discussed in depth. The Welsh framework gives a higher priority to buses and road transport and different approaches are set out for urban and rural areas. Reducing car dependency is a focus for urban areas only, while in rural areas, the need to improve accessibility to public transport for people without a car is highlighted. There is a also a particular emphasis on accessibility to and from other regions in the UK and other countries. In this respect, the framework focuses on improving the road network, whereas safety, health and environmental issues are covered superficially compared to the condition of the road network. For freight, while it shares the UK Government's target of increasing rail freight transport, there is still a greater emphasis on transporting freight by road. In Northern Ireland, a different approach is also taken depending on the area type.

PART IV EFFECTIVENESS OF THE COMMISSION'S CONTRIBUTION

This part of the Review addresses the effectiveness of the Commission's contribution to the transport and environment debate and to subsequent policy. Chapter 7 presents an 'internal' evaluation of the 20th Report. That is, it does not directly consider the report's effectiveness in the wider world, but evaluates it in terms of its own form, timing, procedures, etc. A broader evaluation of effectiveness is undertaken in Chapter 8, while Chapter 9 discusses a number of general issues that arose from the review of the 20th Report. Chapter 10 summarises the main points which arise from this Part of the review.

7   An Evaluation of the 20th Report

7.1   Timetable

It is clear that the timetable of the Report slipped on a number of occasions, although it remained quite a compressed one by the standards of other Commission reports. It first appeared as a substantive item on the Commission's agenda in May 1996, with a view to publication of a document at the end of that year or 'early in 1997'. In the event it was published in September 1997, sixteen months later (see Table 7.1).

Table 7.1: Key Dates since the Publication of the Commission's 18th Report

Date	Event
October 1994	RCEP published its *18th Report: Transport and the Environment*
April 1996	DoT published Transport Green Paper *Transport – The Way Forward. The Government's Response to the Transport Debate* as a response to the 18th Report
May 1996	Commission began planning for a further response on transport
June 1996	The Labour Party published its policy statement on transport: *Consensus for change - Labour's transport strategy for the 21st century*
October 1996	RCEP announced a review of the 18th Report
May 1997	The new government was elected and Labour Party came to power
September 1997	RCEP published its *20th Report: Transport and the Environment - Developments since 1994*
July 1998	The Government published its White Paper on Integrated Transport: *A New Deal for Transport: Better for Everyone*
December 1998	DETR published *The Government's Response to the Royal Commission on Environmental Pollution's 20th Report*
July 2000	*Transport 2010: The Ten Year Plan* was published
December 2000	*Transport Act 2000* received Royal Assent

A number of reasons appear likely to have contributed to this slippage:

- The originally suggested timetable was, with the benefit of hindsight, extremely ambitious for the development of a full report. This may be the result of over-optimism in some quarters, but also perhaps of a lack of clarity over what was intended. Clearly some envisaged a 'short sharp' response to the then Government, and perhaps not even a full and formal report. What emerged in 1997 was, although not on the scale of the 18th Report, a full length and substantive report by any standards.
- It became clear at a certain juncture that it would not be possible (or, perhaps, desirable) to publish the Report any significant period in advance of the election. The Commission then decided that it would not be appropriate for it to publish a

major policy document during the pre-election period of 'purdah'. Once this was decided, then a significantly later publication date became inevitable.

- In spite of efforts to restrict the range of subject matter in the final report and to limit both its scope and the expectations of it, the 20th Report was nonetheless broad and ambitious in its scope. Having set out to review developments over this broad field (and indeed to treat some issues, eg noise, in somewhat greater depth than in the 18th Report) a major report seems in retrospect to have been unavoidable, as was the attendant workload.

- The Commission decided at an early stage that it was neither necessary nor practicable in the time available to call for written evidence. Nonetheless a call was made in October 1996 for the submission of any new materials which were relevant, after which due time would have had to be allowed for responses and then for the Commission to take account of them. An ongoing legal challenge to another report at this time increased the pressure to be seen to consult fully and fairly, and so the Commission wrote to over 250 interested parties, as well as announcing its intention to produce a further report. This wide consultation, perhaps boosted by the high degree of interest in the predecessor 18th Report, drew a wide response, from over 100 individuals and organisations. Many of the latter submitted a covering letter or more detailed response, and many also submitted copies of existing materials which they felt to be of relevance. Not all this material was addressed in any detail in the final Report, as described in Section 7.3.2, but nonetheless it all had to be catalogued and summarised, and its importance evaluated.

- At a critical juncture in the spring of 1997, the 20th Report was running in parallel with an important stage in the development of the 21st Report on *Setting Environmental Standards*. However, no member of the Secretariat team has suggested that the effort required on the Standards Report impacted adversely on the 20th Report; but the converse has been suggested.

As noted above, in spite of these circumstances, the production of the 20th Report remained relatively rapid when compared to other full Commission reports (sixteen months as against an average of two and a half years).

7.2   The Nature of the 20th Report

7.2.1   The Rationale for the 20th Report

Many in the Commission felt that there was an important principle at stake regarding the Government's failure to respond to 18th Report, and that it was irresponsible for a government to ignore the Commission's concerns in such a cavalier manner. On this basis they maintain that a further Commission response was necessary. However there was always a danger that this response would be seen as rather small-minded by the world at large, fairly or not. Moreover, the then Prime Minister had conceded the principle of formal and detailed response long before the 20th Report was published, even though it was clear that no further direct response to the 18th Report would be forthcoming.

Some appear to have felt that, given this and the change of government, the point was no longer worth pursuing by the date of publication of the 20th Report. Further, even if

a response was felt to be necessary, it does not automatically follow that it should have taken the form of a full report.

In the event, the change of government provided a new focus for the report. The Commission clearly had some serious concerns about the continuation of some of the unsustainable trends that it had identified in the 18th Report. There had been progress in some areas, but not in others. In particular overall levels of road traffic had begun to rise again, and the modal shares of the more environmentally friendly modes (rail and water freight; walking and cycling) continued to stagnate or decline. Furthermore, it is understood that some Members were particularly concerned over the possible implications of rail privatisation, and the poor prospects for integration of different modes of transport. More generally, it was recognised that the 1996 Green Paper marked an important shift in tone which was broadly compatible with the Commission's views, but that it lacked any specific programme of action. Hence a new or additional rationale was clear; but in our judgement it still appears unlikely that a follow-up report on transport and the environment would have been published at the time and in the form of the 20th Report if the Conservative government had followed past precedent by responding formally and in detail to the 18th Report.

7.2.2   The Typology of Commission Reports

The Commission's reports fall into two types: the first draws attention to, and sets a framework for analysis of, an issue which has not been widely or coherently considered. The Commission's reports on BPEO (the 12th) , GMOs (the 13th) and Soil (the 19th) all arguably fall into this category. A second type brings existing materials on a known issue together in a new configuration, and draws conclusions.

Even the ground-breaking 18th Report, arguably, included rather little that was completely new or was not being said by others; that is it was a 'type 2' report according to the above classification. The distinctive elements were that it consolidated and distilled this material into an authoritative compendium; that it came from an authoritative source; and that it conveyed a clear message which resonated with many who received it. Rather as Owens and Rainer describe the 9th Report on *Lead in the Environment*, ' it acted independently to synthesise and reframe existing knowledge'[22].

The 20th Report does not really fit either of these types, as it was unique in reviewing progress only a short time after a predecessor report. As such it could not by definition replicate the first of the three distinctive elements of a 'type 2' report set out above (except perhaps on one or two topics), and arguably did not achieve the third either.

7.2.3   Aims, Objectives, and Scope of the 20th Report

Notwithstanding the unusual nature of the 20th Report, insiders to the process generally maintain that the scope and remit of the report were straightforward and were fairly clear from the outset. The fact that it was to be a review was argued in itself to dictate the content to a significant extent. Furthermore, the relatively short

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[22] Owens S and Rayner T, *When Knowledge Matters: The Role and Influence of the Royal Commission on Environmental Pollution*, J Environ Policy Plann 1: 7-24 (1999), p11

drafting cycle may itself have precluded any major shifts of emphasis, although ideas did of course develop as the draft progressed.

7.2.4 Form of the 20th Report

However, if the aims and objectives were clear, it appears that the expected form of the output was less so. This is reflected in the fact that, even when the formal announcement of the review was published, it did not indicate whether a full report would result. This ambivalence seems to have persisted for some time. If it was to be a full Commission report, then clearly it had to be substantial, and as a review, it was clearly desirable to give a full and fair treatment of recent trends and developments. Although there had been few developments in some areas, in others (eg air quality, vehicle emissions and fuel quality) there was progress to report and evaluate.

To achieve a full review, therefore, a great deal of material was included which, although useful in its own right, was not particularly germane to the main message of the report. This includes descriptive text, background material, additional information on some issues (eg noise), and the fairly comprehensive review of developments. It was, arguably, useful or even necessary to have a summary of developments since 1994 in such a review; but it is questionable whether this was central to the report's objectives. Also, it did not reflect in any depth on *why* things were not happening or seek to address these reasons directly. There is a strong body of opinion that, as a result, the report is unduly long for its purpose, and lacks focus and therefore impact.

Some indeed had argued throughout for something much shorter and 'punchier', and some felt from the outset that it should have been only around 50 pages in length; but in the event no limit was imposed. As against this idea, there were clearly concerns that this might not carry due weight or receive sufficient attention in government or the media if it did not constitute a 'full' report. The lack of attention which has been paid to the Commission's more recent paper on aviation, which was a relatively brief response to the Government's aviation consultation, perhaps bears out these concerns (see Section 9.3); but the tensions between the desires for a short report and a full one do not seem at any point to have been decisively resolved.

Equally, the Commission made every effort to stress that the 20th Report was a review rather than a report in its own right, but had little choice but to title it a 'report' in order to ensure that it would receive due attention. This, coupled with the substantial content of the report which has been noted, militated against efforts to characterise it as a follow-up, and may itself have created expectations which the 20th Report could not, or perhaps was not intended, to fulfil.

The tendency to include extraneous information, the decision to produce a full report over a more concise document, and the subsequent potential for false expectations all raise the question of whether the Commission's basic format for its messages (ie with a strong focus on major reports) is sufficiently flexible for all of its purposes, including that of the 20th Report. This point is returned to in Section 9.3.

7.2.5 Structure and Content of the 20th Report

The 20th Report comprised 113 pages in the main text, plus seven appendices. This is significantly shorter than some of the Commission's most substantial reports

(including the 18th), but longer than others. On balance it is long enough to count as a substantive report.

Table 7.2 Mapping the Contents of the 18th and 20th Reports

Contents of the 18th Report		Contents of the 20th Report
CH1: Scope of the report		*Introduction*
Environmental problems caused by transport		CH1: Facing the challenge
CH2: Growth of mobility		
CH3: Effects of vehicle emissions		*Reducing environmental damage through technology*
CH4: Other major impacts of surface transport*		CH2: Cleaner and more efficient road vehicles
CH5: Air transport**		
Approaches to a solution		CH3: Countering noise
CH6: Perspectives on transport policy[†]		
CH7: Economic aspects of transport[†]		*Reducing environmental damage by changing transport patterns*
CH8: Road vehicle technology and performance		CH4: Getting about in different ways
CH9: Transport and land use planning		
Future policies towards transport		CH5: Reducing the impact of freight movement
CH10: Freight transport		
CH11: Local journeys		CH6: Making best use of roads
CH12: Long-distance transport*		
CH13: Institutional dimension of transport[†]		CH7: Planning for an integrated transport system
An environmentally sustainable transport system		*Main conclusions*
CH14: Conclusions and recommendations[†]		CH8: Integrated solutions

* Partially covered in the 20th Report

** Not covered in the 20th Report

[†] Issues addressed in most chapters of the 20th Report

The contents of the 20th Report are set out in Table 7.2 alongside the contents of the 18th Report in order to facilitate a comparison between the two. The 18th Report has a clear, logical structure, which sets out the problem, potential solutions and policy approaches in a coherent manner. The 20th Report in contrast does not appear to have such a logical structure. Rather it contains six sections, each with a different focus, but all related by the theme of reducing the environmental damage caused by the transport sector.

As can be seen by the arrows in Table 2.1, the order of the 20th Report is different to that of the 18th, and in many cases, there is not a one-to-one mapping between chapters. Indeed, often, eg in relation to the economic aspects of transport, issues discussed in a chapter of the 18th Report are mentioned in a number of different chapters of the 20th Report.

There is also significant variation between the lengths, styles and structures of the different chapters of the 20th Report. Table 7.3 below briefly summarises the lengths and numbers of footnotes in the various chapters, and illustrates the degree of variation. Thus of the substantive chapters, the longest is more than four times as long as the shortest, and has nearly five times as many footnotes.

Table 7.3 Contents of the 20th Report

Chapter	Number of Pages	Number of Footnotes
Introduction		
CH1: Facing the challenge	13	77
Reducing environmental damage through technology		
CH2: Cleaner and more efficient road vehicles	26	152
CH3: Countering noise	9	34
Reducing environmental damage by changing transport patterns		
CH4: Getting about in different ways	19	85
CH5: Reducing the impact of freight movement	6	31
CH6: Making best use of roads	8	54
CH7: Planning for an integrated transport system	13	67
Main conclusions		
CH8: Integrated solutions	9	0

Commission reports are always written to a high standard, and uniformity of style is supported by a 'house style' used by all of the Commission Secretariat; by the involvement and oversight of the Commission Members themselves; and an editing function fulfilled by senior Secretariat staff. In this case, however, and in spite of the fact that the 20th Report is not especially long by the Commission's standards, these factors do not seem to have been sufficient to deliver a report which was fully consistent in style, structure and level of detail. Clearly this is influenced in part by the nature of the subjects under discussion, their relative importance and the amount of new material needed; but seems also to reflect differing approaches by those involved in drafting, and the amount or nature of the new material available.

A further suggestion is that drafting began too early, perhaps before the form and content were sufficiently well agreed, and that it then became difficult (as is commonly the case) to whittle down useful and interesting material, even when it is not fully to the point.

It has also been noted that the 20th Report does not have an index as Commission reports generally do. This omission may have contributed to the lack of accessibility of the 20th Report which has been commented upon elsewhere. On the other hand, with it being a review rather than a comprehensive work of reference, this omission may not have been as important as it would have done in other cases.

None of the above lines of argument can be claimed to be conclusive. However, having reviewed the 20th Report in great detail, the reviewers feel that it does not have the same degree of coherence as the 18th, for example, and is not as tightly structured and argued.

7.2.6 Exclusions of Subject Matter

As noted above, in order to limit the scope of the 20th Report from an early stage, it was decided to exclude the subjects of waste and aviation. In response to the strong pressure to limit the scale of the exercise, it was decided to concentrate on a central core of interrelated issues around surface transport, which was also central to the agenda of the incoming government.

Waste and aviation were not part of that core, and some suggested in addition that there was relatively little to add to what had been said in the 18th Report on shipping, and at the same time that aviation, in particular, was a major subject in its own right.

Clearly it was necessary to establish some priorities, or it is unlikely that the report would have been capable of being managed and completed before the White Paper. It is noteworthy, however, that the exclusions include two areas where there have been subsequent difficulties:

- As set out in Appendix II of this review, there has been slow progress on the recycling of waste tyres and vehicles. Owing to a slump in the price of scrap metal, the problem of abandoned vehicles is growing, and appears likely to be further exacerbated by the UK's implementation of the EU end-of-life vehicles Directive.

- The Government's approach to aviation and airport capacity provision has motivated the Commission to produce a separate paper emphasising the global warming implications of the growth in air travel. This is discussed further in Chapter 9.

7.2.7 Approach to Conclusions and Recommendations

There was an early attempt to draft new recommendations for the 20th Report, but it soon became clear that it was not practicable to review the previous recommendations in detail and to agree them 'line by line' with new members who had joined the Commission since 1994. Equally, it was realised that it would in any case be undesirable and possibly confusing to publish a new set of recommendations so soon after those of the 18th Report.

Although there are some implicit new conclusions within the text, it was agreed for similar reasons that an explicit set of new conclusions would also not be appropriate in the 20th Report.

There may also have been a feeling that the new Government should be encouraged to adopt a more sustainable approach, but that it would not be helpful to be too prescriptive as to specific measures at such an early stage.

It is clear that the lack of recommendations did make the report more difficult to understand, however, and this arguably compounds issues over the length and content of the report. We have ourselves encountered some difficulties in undertaking this review of the Report for precisely these reasons. It appears that the incoming Government encountered similar difficulties, as the officials responsible asked the Commission to clarify which elements of the Report it felt to be priorities for the purposes of the Government's response.

This request was complied with by the Secretariat, but our detailed analysis suggests that the Government's response, although generally very positive, was nonetheless rather patchy. This in turn suggests that, in the absence of specific recommendations requiring a response, it was perhaps easier for the Government to overlook parts of the report which it found unpalatable or uninteresting. Further, even in areas where the Government broadly concurred with the Commission's arguments, it may have

settled on a course of policy action which was different from, or less than, the Commission would have wished. To give some examples from specific paragraphs of the 20th Report:

- Paragraph 2.24 offered support to the idea of an Air Quality Forum, to ensure that the NAQS would be regularly monitored and reviewed. The Government set up such a body, but did not give it this role.

- Paragraph 2.62 reiterated the need for a precautionary approach to 'dieselisation' of the car fleet, and more stringent stage III limits than those proposed. The Government set out a rather limited approach to dieselisation in its response, and did not mention precaution, although in the event it arguably did rather more than it claimed. It did not address the Commission's specific concerns over diesel emission limits, stating merely that 'EC stage III and IV legislation will clearly help to improve … emissions …'.

- Paragraph 5.6 called for wider adoption of initiatives to reduce distances over which goods are transported, but this was not addressed, as the response focused instead on modal shift.

- The Commission argued in paragraphs 6.11 and 6.12 that new road construction should be confined to cases where this represented the best practicable environmental option (BPEO); but the Government never responded to this idea, and the BPEO concept has not been taken up.

7.2.8   *The Use of Targets from the 18th Report*

The targets from the 18th Report vary considerably in their nature. Only one (B2, which related to the establishment of air quality targets to protect sensitive ecosystems) related specifically to a policy target; the others all refer to outcomes 'in the real world'. While several (eg on emissions of carbon dioxide and air quality respectively) relate to a specifically environmental output or outcome, others have only an intermediate link to the desired environmental outcome – eg through the fuel efficiency of vehicles (F3), the safety of walking (C3), or the desirable degree of modal shift in certain areas or subsectors (C1; C2; D1; D2 and D3).

Only two (B1 and B2 on protecting human health and ecosystems from the adverse effects of poor air quality) relate specifically to scientifically-determined thresholds; the others indicate an environmentally-desirable direction for future trends, and do so more or less specifically and directly. As with most environmental targets, therefore, some are open to the charge of being arbitrary and not fully justifiable. Also, their precise meaning and status is not clear – that is, are they intended to reflect what might happen with reasonable policy action; what was required for environmental protection; or a desirable direction in which to aspire?

Whichever they were intended to be, many would have been challenging even if the Government of the day had in 1994 set itself the task of meeting them – which in most cases it did not. By late 1996 or early 1997, although additional trend data were sparse, the Commission was already aware that some of them were becoming difficult or impossible to fulfil. It was nonetheless decided to reiterate the 18th Report targets in

an appendix to the 20th Report. Revising the targets was apparently considered, but rejected for some combination of the following reasons:

- The 18th Report targets had always been intended to be demanding, or even aspirational, and they continued to serve this purpose;
- The Commission's reasons for not wishing to issue new recommendations would also apply to a revision of the targets;
- In practical terms, it would have been difficult in any case to revise and agree new targets in detail in the time available.

On balance this seems to have been a realistic decision. It can be seen from Appendix II and the discussion above that a few of the targets have been or might be fulfilled, but most will not.

There is of course considerable debate on the desirability of aspirational targets, of certain types of targets for economic sectors and subsectors, of targets for intermediate outcomes, etc. The judgement as to whether it was appropriate or useful to include the 18th Report's targets in the 20th Report is likely to depend primarily on individuals' or institutions' views as to the desirability in general of such targets, rather than on their specific and individual merits in this case.

7.3 Working Methods

7.3.1 The Transport Working Group

Recourse to a working group has many precedents in the history of the Commission's procedures. However, they reportedly went out of fashion somewhat during the more recent period of the Energy (the 22nd) and Environmental Planning (the 23rd) Reports; but some of the shorter studies, up to and including the 17th Report on the *Incineration of Waste*, were largely carried out by working groups. More recently, during the latter stages of the recent Environmental Planning Report (the 23rd), a working group has been taking forward the Chemicals study in parallel.

In the case of the 20th Report, the use of a Transport Working Group (TWG) was principally a question of efficiency, used by the Commission as a means of speeding up the drafting process. Some insiders suggested that it was the only way to progress it sufficiently quickly, in parallel to a major phase of drafting on the 21st Report on Standards. The TWG appears to have gone further than most, however, in that the group was responsible for drafting the whole of a substantial report rather than just aspects of a report, or the whole of a shorter report, as in other cases.

The adoption of a working group approach appears to have provided an effective vehicle for the development of a substantial report over a relatively short period of time, with detailed assessment and input by a cross-section of the Commission's expertise.

As noted above, efforts were made to involve both members who had been involved in the 18th Report, and some who were not, to ensure a representative range of views. There do not appear to have been any major divergences of views within the TWG as a result, but there are indications that the new members brought some fresh perspectives to the subject at some points.

It has been argued that the working group approach can have drawbacks in that arguments already thrashed out in working groups may need still to be rehearsed in the plenary sessions, or that a working group may take a line which diverges from the views of other Commission Members; but in this case the dangers seem to have been effectively minimised by keeping the Commission as a whole fully informed of progress. Furthermore, the then chair of the Commission was also chair of the TWG, which may have given additional coherence and continuity between the two.

7.3.2   Use of Evidence

It is always important for the Commission to invite and take account of evidence. However, the nature of the 20th Report, as a review of progress, resulted in a rather different focus and approach from the usual one. That is, there was strong recourse in the drafting to the works of other expert bodies (eg SACTRA, the Auto-Oil Programme, various government policy documents, etc), and rather less emphasis than usual on the scientific background material, except in some specific areas.

There was nonetheless a great deal of new material presented, and this had to be assessed. However, it was used quite selectively in developing the 20th Report, as the latter had a more limited scope than the 18th. Informal follow-up with government officials and outside agencies was in many cases felt to have been more productive than the formal written evidence.

Some questioned whether the sifting of extensive written evidence was the best or most time-efficient way for the Commission to undertake a report such as this. It was suggested, for example, that it might be more productive to commission some sort of literature review or expert opinion pieces prior to embarking on a major report. This might not only cut down drafting time, but also allow the Commission to be more targeted in the areas and questions on which it subsequently seeks outside views. On the other hand, this would need to be balanced against the need for the Commission to be seen to be even-handed and to take account of evidence from all interested parties.

7.3.3   External Review

As is always the case, parts of the full draft of the 20th Report was sent out for peer review to selected experts. This was and remains a useful practice, which can help to improve the quality of the end product and is an important aspect of quality control. However, this review takes place at too late a stage to be able to take on board suggestions for major changes in the structure or content of the report, and it may be worth considering ways in which outside expertise might have been engaged throughout the Report's development.

8 Evaluation of the Impact of the 20th Report on Policy Developments

8.1 *The Context: Labour Party Policy in Opposition*

In tracking the cause and effect relationship between Commission recommendations and government responses, it is important to bear in mind that the Commission does not work in a vacuum. Indeed, an important area of its activities is often drawing together material from a range of other sources and putting it together in an authoritative way. As such, few ideas in the reports are brand new or unique to the Commission. Certainly it is likely that an endorsement from the Commission will give an idea added weight, and may reinforce a government's resolve to act, but nonetheless, even if a recommendation from a Commission report is adopted, this success cannot necessarily be attributed wholly or with certainty to the Commission. As outlined in Section 2.1.1, there was a body of relevant thought and analysis developing on transport and environment in the late 1980s and early 1990s, albeit an incomplete and imperfect one.

There is a further and more specific difficulty in distinguishing the effects of the 20th Report from those of the 18th Report and even earlier material. John Prescott had played a central role in the Labour party since Blair's election as party leader, and had taken a strong interest in alternative views on transport policy from the outset. This included being Shadow Transport Secretary from 1983-4, and taking an active part in transport policy preparation for the general election of 1992, which the Labour Party had a strong expectation of winning at the time. A party policy paper entitled *Moving Britain into the 1990s* was published at an early stage, and Prescott initiated an informal working group which published a series of papers in 1992[23] to which he wrote a foreword. Contributors to this publication included a chapter by Dr Claire Holman (advisor to the Commission on the 18th Report) and Malcolm Fergusson (one of the authors of this review) on environmental targets, and papers on other relevant topics by a number of academic experts and transport professionals.

These ideas, and the important influence of the 18th Report in 1994, were important in shaping the main elements of Prescott's policy priorities long before Labour came to power in 1997. His views were undoubtedly influenced and reinforced by the 18th Report, but he was clearly aware of the environmental and other arguments for a change in transport policy long before the publication of the 20th Report. Indeed, as Chapter 3 illustrates, several elements of the 20th Report were already stated Labour Party policy by 1997.

8.2 *Timing of the 20th Report*

As well as content, the timing of a report can be critical to its success or failure in terms of immediate response, even though Commission reports seek to take a long-term perspective. The timing of the 18th Report had been an essential element in its success, for example.

In contrast, however, several analysts have suggested that the timing of the 20th Report was awkward or at least less favourable. It is true that it came in advance of an

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[23] Roberts J, Clear J, Hamilton K and Hannah J (eds) (1992) *Travel Sickness*. Lawrence and Wishart, London

important White Paper, and was not too late to influence it at the level of detail. However, as argued above, the main thrust of the new Government's priorities had been determined some time before this date, and the Commission was by this time one of many bodies advocating a broadly similar set of policies. The White Paper did make due reference to the 20th Report, but it is argued below that it is far less clear that the latter had a clear and attributable influence on government policy as set out in the White Paper.

In 1994, the 18th Report was published during a rather lean period in transport and environment policy, with little policy progress being made in some key areas. Therefore the Report was seized upon by the many interest groups which were calling for change, and its publication constituted a policy milestone in its own right. In 1997, in contrast, the election of the new government was the key event, which seemed to promise very substantial changes in transport policy anyway. Although it quickly became clear that there was no immediate prospect of legislation or a great increase in public spending on transport, the White Paper was in preparation and there were many other initiatives in train. Against this backdrop, it is far from surprising that the Commission did not command the same degree of attention the second time around as it had in 1994.

Albeit perhaps largely with the benefit of hindsight, several analysts suggested that a follow up would be more timely at the time of writing this review, when the extent of the government's successes or failures in relation to the targets of the 18th Report, and indeed to its own Ten Year Plan, are becoming clearer. Thus there might in retrospect have been an argument for the Commission to 'keep its powder dry' back in 1997.

8.3   *General Views on the Effectiveness of the 20th Report*

Owing in part to its nature and content, a number of those interviewed from outside the Commission were left with a strong impression that the 20th Report did not contain anything of substance which was new. Furthermore, the Commission's messages were by this time broadly in line with the sort of arguments being purveyed by a broad range of other policy stakeholders, and it received relatively little policy attention for this reason. Indeed, given the high standards set by the 18th Report, it may even have been counterproductive in some stakeholders' eyes, and there are certainly quite strong criticisms of the report in some quarters.

There is some divergence of views on the overall effectiveness of the 20th Report. Few outsiders argued that it added a great deal to the debate or had a decisive influence, although some felt that it was 'helpful' to one extent or another. Tellingly, few outsiders could recall the content of the report in any detail, however, or even characterise any distinctive features of it.

Its main significance may have been in the mere fact of returning to the issue, to underline that it was an important one and that not nearly enough was being done. This argument was trailed in the press coverage at the time (see Section 2.3.3), but aside from this it may weigh more heavily with an insider who would be aware of the unprecedented nature of the Commission's action. An outsider could easily miss this, especially some time after the event, and would perhaps tend to focus exclusively on the form, content and effects of the report.

8.4 *Impact of the Targets from the 18th Report*

As Chapter 4 has shown, few of the targets from the 18th Report have been, or now seem likely to be, achieved. In some cases this was already becoming apparent by the time the 20th Report was published, so in this sense it is not sensible to attribute the success or failure in meeting targets too heavily to the degree of influence exerted by the 20th Report.

A further point is that the major success story in this area is in air quality, where a great deal of the relevant legislation emanates from the EU rather than national legislation. We have been able to identify some instances in which the UK government appears to have played a positive and proactive role in pursuing demanding emissions or air quality standards, but elsewhere, owing to the lack of transparency within the EU Council of Ministers, it is difficult to evaluate the government's contribution with any certainty. Nonetheless, some aspects of UK policy clearly go beyond the specific requirements of EU legislation, and this is indicative of a proactive policy stance. It seems likely that the Commission's strong emphasis on scientific, health-based targets has been instrumental in bolstering government policy in this area.

The other area in which the Commission's target appears likely to be met is in pedestrian casualties. Here, however, the UK has a long history of positive policy intervention; indeed, a recent benchmarking study identified road safety as the one area of transport policy in which the UK can claim a leading role in Europe[24]. Further, the then government adopted its own targets on casualty reduction as long ago as 1985[25], so it is not possible to attribute a decisive influence to the Commission in this area

Performance has fallen far short of the Commission's demanding targets relating to transport CO_2 emissions. Nevertheless, the stabilisation of road transport CO_2 emissions in recent years is itself something of an achievement by comparison to the position in most other EU Member States, and may owe something to the Commission's strong emphasis of the role of the transport sector in climate change policy.

The Commission's various targets relating to modal shares have generally not been met. This reflects the limited effect of many aspects of government policy towards public and environmentally friendly transport modes, and a reluctance to tackle the growth in road traffic. Rail use has indeed grown, but given the current image of the rail network, this appears to be more the result of underlying economic trends than of either government policy or public preference.

In most areas, then, performance against the Commission's targets has been disappointing, and they cannot be said to have has a decisive influence on policy. In political terms, too, they have been superseded by the Government's own targets as embodied in the Ten Year Plan and elsewhere. In most areas these targets are less demanding than those of the Commission, but nonetheless represent substantial

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[24] *European Best Practice in Delivering Integrated Transport*, Commission for Integrated Transport, London, November 2001

[25] *Transport – The Way Forward: The Government's response to the Transport Debate* CM3234, London: HMSO, page 38

challenges in comparison to current trends. However, the fact that the Government has been willing to set targets at all, and in so many areas of transport and environment policy, is indicative of an important shift of attitude by comparison to that of its predecessor. The prominence given to targets in the 18th and 20th Reports may well have been a factor in this shift.

8.5   *Impact of the Specific Conclusions of the 20th Report*

As the analysis in Chapter 5 illustrates, cleaner vehicles and fuels have been an area in which the Government can boast of some notable successes. Some of these developments have been EU-driven, but not by any means all. For example, the Treasury has used the tax system effectively to promote cleaner fuels, and this may well reflect the emphasis which the Commission has placed in this area in both the 18th and 20th Reports. Furthermore, the consultation on *Powering Future Vehicles* takes an distinctively strategic view of future vehicle technology, and may again owe something to the arguments expressed by the Commission in the 18th and 20th Reports, and more recently also in the 22nd on energy and climate change.

Thus far, however, the Government has done less well on reducing CO_2 emissions from vehicles. There is a danger that it is placing undue reliance on the EU voluntary agreement on new car CO_2 emissions, and is not giving sufficient emphasis to other supporting measures. Furthermore, there is a substantial divergence between the future projections of transport CO_2, and there is a pressing need to resolve this if future policy is to be developed on a sound basis.

The Government was rather slow to take up the issue of noise in spite of the prominence given to it in the 20th Report. Early efforts focussed mainly on review and assessment. A further response is now beginning to emerge, but critics argue that this still falls well short of a strategy, and that it is being driven by the requirements of EU legislation. It does not appear, therefore, that the Commission's arguments (or indeed other outside influences) have as yet stimulated a significant increase in government attention to noise policy.

The Commission in its 20th Report placed substantial emphasis on a range of policies, measures and campaigns to try to influence travel behaviour in relation to specific transport modes and trip types. The Government has indeed been active in promoting a range of initiatives of this type, successfully in some cases, but less so in others. However, many of these ideas and initiatives were not new at the time of the 20th Report's publication, so it is difficult to attribute a distinctive influence to the 20th Report in this area.

As noted above, the Government has struggled to promote rail and bus transport for passengers, and rail or water for freight, effectively. The broad thrust of its policies has been in line with those advocated by the Commission, but these were not unique to the 18th and 20th Reports. Furthermore, as noted above, at least two of the Commission's more specific recommendations (on 44-tonne lorries and on reducing the length of freight hauls) were ignored.

The incoming Government took a strong line on reducing new road building, and this may well reflect the robust views which the Commission expressed on this subject in the 18th and 20th Reports. It has however been unable to maintain such a clear policy

stance in the face of growing road transport demand. The Commission was amongst the first bodies to promote that idea of road charging for HGVs, and the Government seems, in the wake of subsequent events, to be taking a much more positive view of this idea.

In relation to planning, again, the Labour government has taken a more integrated approach at both the regional level, through the requirement for Regional Transport Strategies, and the local level, by introducing the Local Transport Plan (LTP) system. However, in the case of LTPs, these were an extension of developments under the previous government, and both were prefigured in the Labour Party's pre-election transport policy statement *Consensus for Change* (see Chapter 3). Consequently, again, it is difficult to attribute these policy developments to the Commission's 20th Report.

8.6   *External Influences*

The discussion above has argued that outcomes in transport and environment policy since the publication of the 20th Report have been mixed, have not been wholly positive, and have not lived up to the expectations of the incoming government in 1997. It has also highlighted a number of factors (both internal to the 20th Report itself and in the wider world) which have limited the effectiveness of the 20th Report.

Whatever the particular strengths and weaknesses of the Report, however, it must be recognised that the power of good ideas and good arguments in the policy world is limited; to succeed, they must be able to coexist with other powerful political and economic interests. Hence external factors can seriously jeopardise the success of policy proposals, and arguably have done so in this instance. To pick out just two serious obstacles to uptake of the Commission's ideas:

- Financial pressures have resulted in only limited additional funds being made available for transport, and the potential requirements for upgrading public transport systems far outweigh, and will probably continue to outweigh, the money and other resources available.

- The fuel price protests of autumn 2000 became, quite unexpectedly, the worst political crisis to face the Labour Government since it came to office. This has greatly increased its reluctance to take measures which would be unpopular with road transport interests.

Against this background it is perhaps not surprising to find that the Commission's 20th Report has been less influential than might have been hoped.

9   Broader Matters Arising

9.1   The Commission's Audience

9.1.1   The Immediate Audience

In formal terms, the Commission submits its reports to the Queen; in practical terms it is the government of the day which responds to them. It has been the practice of successive governments to respond formally and in detail to each of the Commission's reports. Governments are not, of course, obliged to agree with the Commission's recommendations, to act upon them effectively, or even to act upon them at all. However, this formal response process reflects the importance of the Commission's advisory role, and is an element in the overall process of sound and transparent government.

It should be noted that the Commission sometimes directs its recommendations to other stakeholders, such as agencies or industry, and also increasingly to the devolved administrations. However, the latter have not yet responded formally to a Commission report, and there is clearly no requirement for a non-governmental body to respond to a Commission report.

Thus the government of the day is the primary audience, insofar as the purpose of the reports is to change policies and institutional structures in such a way as to benefit environmental protection. In this, the national government (and often the devolved administrations) will often have the major role to play. Given the context, this is perhaps more clearly the case with the 20th Report than with some others.

9.1.2   The Broader Policy Community

However, an alternative formulation of the purpose of Commission reports which we encountered was that they should alter the *framework of debate* on an issue in a positive direction, and to ensure that all the necessary aspects are addressed. Not only is this a broader and more long-term goal, but it can also be argued that it implies a less strong focus on the government of the day as audience, and a need to address a much wider policy audience.

Furthermore, the process whereby the Commission produces its reports is not a simple dialogue between the Commission and interested Departments. Neither operates in an intellectual or political vacuum. On the contrary, as argued above, there are many relevant actors in the policy process, and all of these play a part in the final outcome. Such actors may include policy advisors, opposition political parties, other government agencies, parliament and regional assemblies, local authorities, commercial interest groups, user groups, NGOs, academics and other experts, so-called 'think tanks', the media (both popular and specialist), and so on. Arguably these additional interlocutors are especially important when, as in the case of the 18th Report, the government of the day is not immediately receptive to the Commission's arguments.

On the other hand, our research and discussions did not lead us to believe that there was in the Commission a single, concerted idea of the audience for Commission reports, beyond the government of the day, or how, if at all, the Commission should

adapt its messages towards such audiences. Some particular matters which have arisen from our research and interviews are as follows.

- The audience must clearly encompass the devolved administrations and other relevant levels of government and administration within the UK, possibly increasingly to include the English regions.

- The Commission is clearly aware of the EU and international dimensions of many aspects of UK environmental policy, but, given its natural focus on UK affairs and UK government, it was suggested that its reports have some difficulties in dealing with these dimensions effectively. That is, they are often in the position of recommending that the UK government pursue certain goals which are primarily Community matters, such that it may not be able to deliver these goals through no fault of its own. A further difficulty arises subsequently in evaluating UK government policy at EU level, as the closed nature of the Council of Ministers makes it very difficult to know whether the government has taken a positive or negative position in negotiations on any given proposal.

- The Commission plays an active role in the European Environmental Advisory Councils, and published a joint letter on transport with its German counterpart in February 1995; but it may still be possible for the Commission to increase further the relevance of its work to audiences in the European Commission, European Parliament and other Member States.

- It was suggested to us that the Commission could do more to maintain its profile in Parliament as well as government, for example, through regular engagement with Select Committees.

- In particular some stressed the longer term importance of engagement with the opposition parties, as, taking the long view of policy development, these may well be the 'government of tomorrow'.

- Particularly when a Commission report deals with a major economic sector such as transport, it is likely to find a large audience within the regulatory, professional, industrial and user interests in that industry. These will include, in this case, a wide range of regulatory agencies; local authorities and transport authorities; the transport equipment and construction industries, service providers in all subsectors; consultants and planners, passenger groups; shippers and hauliers, etc.

- NGOs and other pressure groups are particularly keen to cite and utilise a Commission report in areas where it supports their own arguments, as it adds an independent weight and respectability to the latter. In short, the reports are used as 'ammunition' by various pressure groups, albeit sometimes selectively.

- The Commission members did not universally regard an academic audience as being important for the reports – which is perhaps surprising, given that nearly all are academics. However, some both within and outside the Commission stressed that the Commission's reports often serve as a useful primer and data source for students. Other evidence suggests that Commission reports do have a long term role through use as student reference material, whereby they influence the thinking of undergraduates or graduates who will later become professionals in

the policy community. However, being primarily a review of developments and not a comprehensive analysis, the 20th Report is arguably less useful for pedagogical purposes than the 18th.

- It was noted that the commission builds links and relationships with opposite numbers and other agencies, not only in the EU but around the world (eg US and Japan). This is an ongoing network of contacts which can crystallise specific initiatives and priorities.

Currently the Commission's intentions towards these other policy actors do not appear to be explicit or completely agreed, so it is not possible to say definitely whether there is a target audience beyond government, and if so, which. By the same argument, it would as yet be premature to make a judgement as to whether the Commission is successful in reaching this audience.

9.1.3 The General Public

It is not clear whether the public at large is or should be a major target audience for the Commission's reports. Some clearly feel that it should be, but it is not self-evident that this is necessary, appropriate or realistic. In its nature, it may be that the Commission is well placed to give some general messages (eg on the nature of environmental threats), but less well suited to others (eg on policy recommendations). Alternatively, it might be considered whether the Commission can best inform the general public indirectly rather than directly, through the agency of the popular press or the campaigning groups and other agencies which make use of its reports.

Furthermore it is clear that the basic format of Commission reports (essentially a substantial volume, and historically without an executive summary) is not easily accessible to the general reader. The 20th Report amongst others does not have recommendations and its conclusions are not very explicit, which arguably makes it more difficult for the uninitiated to extract a clear message. It was the first Commission report to include a brief introductory summary at the start of each chapter; but its final chapter is more a development of arguments than a summary, and of course comes at the end rather than the beginning as an executive summary would do.

It is noted that the 22nd Report on Energy was accompanied by a leaflet summarising the main conclusions in a more accessible way. Copies of this have been circulated quite widely to a range of institutions, including schools, public libraries, etc. The production and distribution cost of such leaflets is reported to be low as a proportion of the total cost of producing a Commission report, and it is anticipated that these will be a regular feature from now on. If so, they might be directed to a wide range of policy actors as well as to public institutions, as it is unlikely that a large number of people, even if they buy the report, will read it from cover to cover.

9.1.4 The Media and the Message

Media attention is nearly always regarded as desirable as a means of publicising the launch of a new report, as the press can reach a wider audience than the Commission can hope to do directly.

However, the quality as well as the quantity of coverage is worth considering. The 20th Report did attract a good deal of media attention, but this did not all do justice to the Commission's messages. As elsewhere, popular press coverage is generally selective at best, and at worst, downright misleading. Better supporting materials (eg the leaflet version), available at the time of the launch, might possibly help to improve the quality of media coverage.

It is always likely that the specialist press (eg *The ENDS Report* and transport newsletters and journals in this context) will give a more balanced and detailed treatment of a Commission report than the mass media. These may well be a better and more reliable route to inform a number of audiences (eg professionals, NGOs, etc) of the Commission's work; but without a clear idea of the audience, it will always be difficult to draw clear conclusions as to the message or the best available medium to deliver it.

9.1.5   *Sectoral Audiences*

A large part of the audience of the 18th and 20th Reports was comprised of people involved in the transport sector, and not primarily in environmental policy *per se*. Interviews reinforced our expectation that very few of these people were aware of the Commission or its reports, at least in any detail, prior to the publication of a report with direct application to them (ie the 18th Report in this case). A similar pattern may well be found, to one extent or another, with many of the Commission's reports.

Clearly the sectoral audience was quickly able to grasp that the Commission was a body of some substance and authority, and that its views were important and useful to them. However most did not have, and still do not have, a close understanding of the Commission's composition, working methods, reporting traditions, etc. This is potentially important, as it conditions the way in which they view the Commission and its work. Essentially they will take a Commission report which is relevant to them at face value, and evaluate it according to their own criteria.

In this review, we have discussed how a number of 'internal' factors which may have helped to shape the 20th Report, for example the desire to elicit a government response; a reluctance to issue new recommendations or targets; the need to publish a full report. However, it is likely that these factors were not at all apparent to much of the readership of the report, and would probably not have been understood or lent much weight if they had been.

9.2   *The Consequences of Returning to the Issue*

The 20th Report remains quite unprecedented in the Commission's history in returning so soon to the subject of an earlier report (by publication date, less than three years after the 18th Report). The circumstances were unusual, and it is open to question whether the same decision would have been made had they been different. Nevertheless, it is perhaps worth briefly outlining the pros and cons of this approach for future reference.

Our analysis has identified the following as possible advantages of this approach.

- As there was an earlier report to build upon, it was not necessary for the 20th Report to set out to be comprehensive in its coverage of the area in question.
- It was able to seek to address some comments and criticisms of the earlier report (eg lack of attention to costs) and to revisit and refine work in some areas which were now judged to merit higher priority (eg noise).
- Many members of the Commission and the Secretariat had developed a base of knowledge and expertise in the compilation of the earlier report, and had retained or even further developed this subsequently. This allowed them to operate, from the inception of the 20th Report, at a much higher point on the learning curve and to focus relatively quickly on the key issues as they saw them.
- For all of the above reasons, it is likely that the Report was able to direct itself more effectively to the preoccupations and questions of the new administration.

Conversely, there were some obvious drawbacks.

- Many of the Commission's reports have had a defining influence on policy, and the 18th Report was unquestionably one of these. In its nature, the 20th was the very opposite. While the Commission was acutely aware of this problem at the time, and was anxious not to generate unrealistic expectations, such expectations were probably inevitable. As such the 20th Report was viewed in some quarters in the light of the 18th, and has been judged as something of a 'let-down' as a result. This judgement may in part draw on the benefit of hindsight, but there were also reasons for supposing, even at the time, that its impact would be limited.
- As relatively little time had elapsed, and relatively few new data collected as a result, there was in some areas rather little which was new for the Commission to say. Some areas were excluded on these grounds. In others, it was for example difficult to judge with any certainty whether government policy was changing, or whether there were any new trends on the ground, or whether these made it more or less likely that the Commission's targets from the 18th Report would be met.
- No matter how sound the rationale for the exclusion of particular issues might be (see discussion in Section 7.2.6), or how well argued, such omissions might lead a casual reader to conclude that the Commission considers these issues to be no longer important.

9.3   Effective Follow-up

The Financial Management and Policy Review (FMPR) highlighted the importance of follow-up for the Commission, although it has been argued elsewhere that the Commission is in fact already quite effective at follow-up, often using informal or opportunistic occasions to raise a subject on which the Commission has reported previously.

Ironically, the 20th Report was, uniquely, in itself a follow-up report. However, it has been argued above that its form (as a full report) caused some difficulties and may itself have blunted its impact. Although there are a number of unusual or unique circumstances surrounding the 20th Report, this may nonetheless suggest that full reports will not always provide the ideal vehicle for follow-up, and certainly not so soon after their predecessor.

One other relevant and more recent example of follow-up in the transport arena has been the Commission's response to the government consultation on airport provision. This is a compact document which nonetheless makes some telling criticisms of government aviation policy in respect to greenhouse gas emissions and sustainability. It was delivered as a formal response to the government, but also published as an Annex to the Commission's 2001 Annual Report, and is available on the Commission's website amongst its press releases, but not adapted to the form of a normal press release. It appears to be a useful and effective document, but informal soundings have indicated that remarkably few of the relevant third party stakeholders were aware of its existence or content. This in turn suggests that while the form of this document may well have been suitable, its means of delivery has not been effective in terms of the wider policy community.

This discussion raises questions over the form and method of delivery that the Commission should employ to deliver its messages. The principal options utilised recently are a full report and press launch, or a press release containing either a statement or a response to a governmental consultation. These latter in particular are principally aimed at the media, and those who read the media, and the decision-makers. However, as can be seen by the press reaction to the 20th Report (see Section 2.3.3), media reporting of the Commission's reports is not always in tune with the Commission's message. The recent innovation of a summary leaflet for the 22nd Report on Energy broadens the range of dissemination routes available to the Commission, as well as attempting to communicate directly with another audience, and may well for these reasons prove to be a useful addition to the Commission's output formats.

These matters, which apply to the dissemination of the Commission's work, combined with others bearing on effectiveness of the 20th Report (see Section 8), raise the question of what means should best be used by the Commission to follow-up its reports, as highlighted in the FMPR.

9.4   Reflections on this Review

9.4.1   Timing of this Review

As explained in the introduction, there is now an expectation that the Commission will review its reports approximately three years after their publication. This review will in the event be substantively completed approximately four and one half years after the publication of the 20th Report, and, perhaps coincidentally, almost exactly one term of government later.

In the course of our analysis we have reflected on the effects of this time lapse upon our ability to assess the report and its consequences. It is clear from this, and from the analysis in Appendix I, that sufficient time has elapsed in most cases to allow us to draw some conclusions on the extent and quality of the government's formal response to the 20th Report. On the other hand, it has not in all cases been possible to take a view on the appropriateness of the response, or on its consequences on the ground, as some policies take a long time to implement, and longer still to take effect. Further, if one takes the view (as some do) that the full impact of a Commission report can only be measured over a decade or longer, then clearly it is too early to assess such effects adequately.

Given the above, there is obviously no single and ideal time at which to undertake a review, but on balance, we felt that the timing of this review was in the event appropriate and workable. However, had it been initiated after three years as originally envisaged, then the analysis would have been substantially less comprehensive than it is now, and, we suspect, less useful.

9.4.2 Content and Methodology

As the magnitude of Appendix I itself indicates, it is an immense task to assess actual progress in policy implementation and/or actual progress on the ground across the sweep of policies encompassed by a report such as the 20th Report. The review of the 19th Report similarly went into some detail – and in some cases greater depth than we have done here. In appraising a wide-ranging report such as the Commission's 20th, this level of detail is difficult to avoid, even when conducting assessments at a relatively superficial and sometimes subjective level on specific issues. However, if this type of review is to be undertaken at all, it would be difficult to produce a report which was less detailed but which still appeared comprehensive and authoritative.

At the same time, as argued above, even this level of detail does not usually allow one to assess with any certainty the degree of influence which the Commission's work has had over government policy. Hence it can be argued that an exercise such as this serves as well or better as an assessment of the government's performance as of the Commission's, and might perhaps be utilised for this purpose.

9.4.3 Reviewing Effectiveness under a Devolved Administration

The review of the 19th Report on Soil attempted a detailed evaluation of policy progress in the devolved administrations. This approach was reported to be particularly useful in some areas, but time-consuming[26]. In this review we opted simply to include a separate, synoptic section (Chapter 6) highlighting the main points of divergence in the devolved administrations from the general thrust of UK policy. This was considered the best compromise available to avoid duplicating the considerable efforts expended in assembling Appendix I of this review.

Further, it has been noted above (Section 9.1.1) that there is not yet any tradition of the devolved administrations responding formally to the Commission's reports, even though in some areas a significant proportion of the Commission's conclusions and recommendations may need to be addressed to them. Given their limited resources, there is perhaps little prospect that they will wish to respond to Commission reports formally and in detail.

As against this, it is implicit in much of the analysis above that the formal UK government response forms an important element of what little there is in the way of an audit trail of policy implementation in the wake of a Commission report. Thus the absence of a devolved assembly response is already a weakness in assessing the effectiveness of the Commission's reports in the devolved administrations, and with the prospect of further devolution of powers and responsibilities to the English regions, this problem is likely to become more serious in the future.

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[26] Barron E, *personal communication*

10   The Effectiveness of the Commission's Contribution: Summary

This final section summarises the principal issues raised by our review.

10.1   The Evaluation of the 20th Report

- There was slippage in the original timetable for the report for a range of reasons both external (eg the 1997 General Election) and internal (eg some lack of clarity over the initial intentions behind the report and the amount of new material which needed to be assessed), but the report was still produced in a relatively short period of time compared with other Commission reports (7.1).

- Even though the report had a clear rationale and relatively clear scope and objectives, we feel that is it unlikely that a follow-up report on transport and the environment would have been produced at that time or in the form of the 20th Report had the Conservative government not failed to respond in the usual manner to the 18th Report (7.2.1 and 7.2.3).

- The 20th Report does not fit into the general typology of Commission reports, as it is unique in being a review of progress only a short time after a previous report (7.2.2).

- The form which the report would eventually take was not clear from the beginning of the process, and there were a number of different views as to what it should be. In the event, the form evolved as the study developed, which is perhaps reflected in the arguably less coherent structure and looser line of argument of the 20th Report when compared to the 18th (7.2.4 and 7.2.5).

- The debate over the structure of the report raises questions as to whether the Commission's existing range of formats is sufficiently flexible to undertake suitable follow-up reports (7.2.4 and 9.3).

- While the reasoning behind the absence of recommendations in the 20th Report is clear to insiders and was well thought through from the perspective of those drafting the report, it is perhaps one of the reasons why the 20th Report is less well-remembered than the 18th, and makes the 20th Report generally less accessible (7.2.7 and 8.3).

- There are many issues surrounding the use of targets, as set out in the 18th Report, but their use has gained greater acceptance in recent years. The decision not to include updated targets in the 20th Report was taken for clear reasons (similar in part to those behind the decision not to include recommendations) and it was considered that those in the 18th Report were still valid (7.2.8).

- The use of the Transport Working Group to develop the 20th Report was considered to be a success and the potential for replication of work (eg the full Commission having to agree on issues already discussed by the TWG) was minimised through good communication and with the chair of the Commission also chairing the TWG (7.3.1).

- There were a range of views regarding the way in which the Commission obtained new information for the 20th Report. A general request for new materials yielded a large amount of material, but was not used in a systematic way. Informal follow-up was often more effective. It was also suggested that commissioning a literature review or a range of expert opinions might have been a more efficient way to set priorities (7.3.2).

- The use of external peer review of Commission reports is useful, but is typically undertaken at a very late stage, thus reducing the possibility of making any substantial changes as a result (7.3.3).

10.2 Effectiveness of the 20th Report

- Policy-making is a complex process involving many actors and as such, it is difficult to identify cause and effect and therefore the effectiveness of any particular report or intervention (1.2.1).

- In evaluating the effectiveness of the 20th Report, it is important to note that the Report was in tune with the political debate which was ongoing at the time, particularly as the new Labour government was already in the process of developing its Integrated Transport White Paper (8.1).

- The timing of the 20th Report, particularly in light of the new Government and the ongoing political discussion, was considered by many to be not particularly favourable to making a distinctive impact. This is in contrast to the 18th Report, which 'reframe[d] existing knowledge' in a timely way (8.2 and 7.2.2).

- The fact that many Commission outsiders felt that the report added little to the debate in 1997 and that few could recall the content of the report in detail suggests that the report did not make much of an impact on those involved in the field of transport policy at the time (8.3).

- Progress towards the attainment of the targets of the 18th Report has been disappointing. Further, for the few targets which have been or might be met, drivers other than the Commission's target (such as EU legislation or ongoing governmental commitments) are often more readily identified as reasons for these successes. The 18th and 20th Reports may however have been instrumental in the increasing acceptance of the use of targets in policy formulation (8.4 and 4).

- The official response to the 20th Report was generally welcoming and positive. However, in practice the detailed policy response been varied in extent and quality, and where it has been in line with the Commission's proposals, the effect had not always been as desired. It is possible to discern the Commission's influence in some aspects of policy development (eg cleaner fuels and vehicles), but again, it is often easier to identify other drivers (eg international commitments, European legislation, etc) (8.5 and 5).

- External events (eg the fuel crisis of autumn 2000) can also have a strong influence on political decisions, so a report such as the 20th may be less influential than they otherwise might have been, no matter how good the ideas and arguments put forward (8.6).

10.3 Broader Matters Arising

- The Commission's reports have a range of potential audiences who might use the information in a variety of ways for their particular purposes (9.1).

- There is a range of possible advantages and potential drawbacks of returning to an issue in the way that the 20th Report did. However, the disadvantages appear to weigh more heavily in relation to the message as it is perceived by the outside world (9.2).

- The Commission's recent innovation of a summary leaflet aimed at the public helps to broaden the Commission's range of dissemination options and to reduce reliance on the media, whose coverage of the Commission's reports is not always a balanced reflection of the Commission's message (9.3).

- It is not clear what is the best means available to the Commission of following up its reports, but it is possible that reviews such as this could contribute to this process (9.3).

10.4 Reflections on the Review Process

- We consider that the timing of this review (which was completed about four and a half years after the publication of the 20th Report) to be appropriate, whereas an earlier review might not have been as comprehensive or useful (9.4.1).

- This review, out of necessity, reviewed the development of government policy in some detail and, as such, undertook work similar to that which the Commission undertook for the 20th Report in relation to the 18th Report (9.4.2).

- Reviews of the effectiveness of the Commission's reports could be potentially onerous if the policies of the devolved administrations are to be dealt with in more detail (9.4.3).