

Unite response to the DfT call for ideas on: Integrated National Transport Strategy

What is the name of your organisation?

This response is submitted by Unite the Union, the UK and Ireland's largest trade union with 1.2 million members across the private and public sectors. The union's members work in various industries including transport, manufacturing, financial services, print, media, construction, energy generation, chemicals, local government, education, health and not-for-profit sectors. Unite also organises in the community, enabling those who are not in employment to be part of our union.

In the arena of transport, Unite represents over a quarter of a million members in all transport modes, making it the largest transport union in the UK.

Unite has obtained the views of our members through our lay member committees at the national and regional levels. Therefore, Unite is in a unique position to submit a response to the Department of Transport's call for ideas on an integrated national transport strategy.

Q: In your opinion, how could the transport network be better 'joined-up'?

Unite and its predecessor union have long campaigned for a strong, integrated and sustainable transport strategy. Indeed joined-up transport networks are key to government growth strategies, contributing to economic development through improving connectivity between regions, facilitating access to jobs, goods and services, and are crucial to driving economic growth and regional equality. This has been discussed by previous governments and commenced with a review into connectivity between nations of the UK in June 2020¹ which "*found that transport connectivity is vital to economic growth, job creation, building houses and social cohesion*"². The report's recommendations included improvements to multimodal corridors to support government objectives on levelling up and net-zero targets.

Addressing overcrowding on public transport

Joined-up transport networks can significantly reduce issues of overcrowding on public transport. Unite has raised concerns about overcrowding, particularly on buses and trains in major cities across the UK. The latest statistics on train overcrowding show increasing overcrowding across our major cities including London, Manchester and Nottingham, with the latter having the greatest percentage increase in passenger rail

¹ House of Commons, '[Written statement: Union connectivity review \(HCWS484\)](#)', 5 October 2020.

² Department for Transport, '[Union connectivity review](#)', 26 November 2021.

arrivals at 32%³. Passengers are then likely to use other forms of transport such as buses where decades of privatisation have seen hundreds of bus routes cut and services diminished. Data from the Traffic Commissioners shows there has been a net decrease of 2,901 bus and coach operators with licenses in use over ten years. This is a decrease of 30.5% which translates into 3,000 bus cuts⁴. Therefore, to improve connectivity for a better joined-up transport network we need public ownership for control of our bus routes and to reinstate routes that have been cut, leaving many communities as transport deserts.

Unite believes that overcrowding affects the safety of commuters as well as transport workers. Unite calls for clear rules to be provided on the maximum capacity levels on all forms of public transport, and for the government to also provide a method of enforcing them rather than expecting transport workers to take action.

Transport hubs

Unite supports the development of transport hubs to improve multimodal connectivity, reduce car usage and emissions, improve accessibility to jobs, goods and services (which in turn benefits the wider economy) and increase ridership across the whole public transport network. To ensure transport hubs deliver these benefits, they must be designed and developed in partnership with local communities and stakeholders such as trade unions and groups representing transport users such as the Motability Foundation who represent the mobility needs of disabled people, this would ensure transport hubs are sustainable, accessible and inclusive. Additionally having worker representatives as stakeholders would contribute to discussions on planning and coordinating schedules and fare policies between transport systems.

In addition to large cities, transport hubs should also be used in rural areas to integrate transport options, helping to improve local accessibility, provide sustainable travel options and address transport poverty and social exclusion across many rural towns⁵.

Unite calls for transport planning that addresses transport deserts, particularly in rural and remote areas, with bus service provisions based on community public transport as opposed to what we have seen in the four decades since privatisation where route planning has been profit driven with schedules and routes developed solely on the numbers riding the bus rather than wider coordination with other transport modes.

³ Department for Transport: Accredited official statistics **Rail passenger numbers and crowding on weekdays in major cities in England and Wales: 2023**. Published 19 September 2024.
<https://www.gov.uk/government/statistics/rail-passenger-numbers-and-crowding-on-weekdays-in-major-cities-in-england-and-wales-2023/rail-passenger-numbers-and-crowding-on-weekdays-in-major-cities-in-england-and-wales-2023>

⁴ Traffic Commissioners for Great Britain, Traffic Commissioners Annual Reports, Table 8, last updated 20 August 2021

⁵ Transport for the North: *Applying our evidence and analytics to improve rural connectivity*. [Link](#).

Unite is pleased this government is looking at improved integration of our transport network and this should include access to public transport to get commuters to stations, airports and ferry terminals before the first train, plane or ferry leaves and after the last one. This would benefit commuters as well as transport workers who also access public transport to commute to work, delivering a transport network which benefits the economy rather than the current system where transport provision is primarily a source of profit for privatised finance.

Reducing traffic congestion

Traffic congestion has direct and indirect costs to the economy with one study finding that between 2013 and 2030, the total cumulative cost of congestion to the UK economy is estimated to be over £300 billion, with the annual cost of congestion set to rise by 63% to £21.4 billion over the same period⁶.

Congestion affects route planning for bus services and also impacts the logistics sector with delays to deliveries particularly impacting haulage workers leading to longer working hours, resulting in increased stress and fatigue and reduced productivity. Such working conditions are often cited as reasons why many haulage drivers are leaving the industry which is currently operating with 40,000 fewer drivers than it needs to function at full capacity⁷.

Freight hubs

The recommendations of the UK Connectivity Review report included the need to improve seaport connectivity to rail to improve movement of goods and reduce lorry congestion at ports such as Dover⁸. Unite is concerned that 10 UK seaports account for around 70% of all maritime freight movements in the UK⁹, this must be addressed through improved port-to-rail-to-road distribution. For example, currently UK based lorry drivers are working extended hours and battling for space on the motorways to places like Dover. A potential solution would be to move freight traffic from this area by train to Wembley or beyond to the few places in the UK that are connected to a W12 loading gauge line to reduce the congestion and reduce the need for cabotage.

Southampton, Felixstowe, Liverpool, Birmingham, Derby, Manchester, Leeds, Hull, Newcastle, Edinburgh and Glasgow are all connected to a W10 or W12 gauge cleared line, which means that if there was a link between Wembley and the tunnel train

⁶ <http://inrix.com/press/traffic-congestion-to-cost-the-uk-economy-more-than-300-billion-over-the-next-16-years/>

⁷ <https://www.bbc.co.uk/news/articles/cp8lgmnn8y2o#:~:text=According%20to%20Mr%20Kirk%2C%20one,between%20home%20life%20and%20work.>

⁸ BBC News: *What has been causing congestion in Dover*. 9 February 2022. [Link](#).

⁹ Department for Transport. (2020). Sea passenger statistics [Dataset]. Table SPAS0101. [Link](#).

manufacturing in Derby could bid for the provision of European train contracts and for replacement rolling stock further afield so all can be delivered by rail rather than the current practice of using large lorries, cranes and ships to deliver cars and other large goods to European customers.

As the ports are connected to the W12 network it also means that shipping freight could avoid the cost of the EU's Emissions Trading Scheme, by loading their cargo here and ship it by rail to Europe once the route is gauge cleared. Additionally, this connection would link the England and Scotland to Europe and Asia by rail, but not Wales. W12 clearance is needed on routes to Wales and the port of Bristol if full advantage can be made of the rail freight network.

This also provides benefits to the environment as these trains are powered by French nuclear electrical supply energy and will ideally be powered by zero-carbon UK electricity from 2030, avoiding the need for the ships to burn low sulphur fuel oil or LNG on sailings into Europe. The tunnel can only take a maximum of 70 empty containers or normally less than 50 containers filled with goods per train and 35 in each direction and 70 per night through the tunnel, however, this is about the equivalent of a small container ship a night each way. The tunnel is also cleared for double stacked empty containers but only HS1 is loading gauge cleared for that height. If the tracks themselves were EU standard heavy gauge rails, then heavier loads could be operated over the network, fewer repairs would be needed, and journeys would be smoother as the rails would be less likely to buckle. And that could mean more freight on each train. Rather than the limits caused by UK rail profiles.

Addressing safety concerns and tackling violence against women and girls

The lack of connectivity and issues accessing safe and affordable public transport particularly impact women and girls. Much of our transport network fails to address and root out passenger safety issues or address concerns about sexual harassment on public transport and on our streets. Unite calls for planning for transport integration to include solutions to improve safety for women who are particularly vulnerable to sexual harassment on public transport.

A 2020 YouGov report found over a third (38%) of women have been abused on London buses. More broadly a 2020 report by the Government Equality Office which surveyed individuals to capture the prevalence of sexual harassment, found over a quarter of people in the UK who had experienced sexual harassment in the last 12 months, of the 28% who had experienced sexual harassment on public transport, 62% said this had occurred on a bus. Furthermore a survey conducted by Plan International UK in 2018 showed that as many as 38% of young girls aged 14 to 21 have experienced verbal

harassment, including sexual comments in public places, including on public at least once a month¹⁰.

Unite has launched a multi-sector campaign developed between the Passenger and Hospitality sectors of our unions. Our Get Me Home Safely campaign (link here: <https://www.unitetheunion.org/campaigns/get-me-home-safely-campaign/>) sets out a host of key solutions to tackle women's experiences of sexual abuse in and out of the workplace, help women and all night time economy workers to access safe transport home and addresses sexual harassment on public transport and the wider community, from a bus perspective the campaign calls for;

- (i) Legislative change to address the weakness in enforcement of the law against sexual assault and harassment on public transport;
- (ii) Municipal ownership of buses as a way to tackle the chronic shortage of night services;
- (iii) Mandatory training for transport workers on gender-based violence to include practical guidance on reporting sexual harassment and assault on public transport. **(This is being considered under the proposals in the Bus Bill which include mandatory training for bus workers on gender-based violence and Unite is proud of its involvement in developing this training with bus operators).**
- (iv) Clear and operational CCTV on all forms of public transport.
- (v) National standards for taxi and private hire and an end to cross border hiring to improve the safety of women and all passengers on all forms of public transport.

In addition to the above Unite calls for increased public transport services and multimodal connectivity at late and unsocial hours to support late-night and shift workers such as hospitality, transport, logistics, airport and healthcare workers to commute safely to and from work.

Data in the context of the next question can mean having better information about journeys, such as but not limited to departure times, journey planning, traffic information and accessibility information.

Q: How could data be used to improve the transport network?

Support the road to net zero

Unite understands the benefits of using electric vehicles powered by fuelled hydrogen, however, we are also aware that these types of vehicles also produce gases which enter the atmosphere. Therefore, data could be used to capture levels of exhaust gases to

¹⁰HM Government: Tackling violence against women and girls. July 2021. [Link](#).

better inform transport operators and the DfT on solutions to reduce emissions. This would support the UK's legally binding pledge to reduce emissions by 78% by 2035 and to reach net zero by 2050.

Commuters should also be able to access information about air quality while using public transport. Recently the FAA have started a more thorough investigation into what has been deemed Aerotoxic syndrome¹¹. This particularly affects pilots, cabin crew and frequent flyers and Unite is aware of an autopsy of an ex-long serving British Airways pilot discovered "*one of the worst cases of organo-phosphate poisoning*" ever seen by an expert in that field¹², which is understandably concerning. There is just one model of aircraft that does not use the engines to compress the air for the cockpit and passenger cabin, the Boeing Dreamliner. If passengers were aware of the quality of the air on aircraft that they are being subjected to, they may vote with their feet to other options, which could encourage changes in the industry and also help flight and cabin crew avoid permanent disability and early death. Such data could include when the filters and seals were last serviced and the frequency of seals failing causing a fume event.

The air quality on all forms of public transport is a concern especially in built up areas where concentrations of Nitrogen Oxides (NOX) and particulate matter can be particularly high and cause a series of health conditions. At many stations and train maintenance facilities, which were designed for the steam train, the amount of PM10 and DEEE particulates from diesel engine train exhausts, is very high. This has become the subject of investigations and interventions by the ORR into solutions. Unite is aware this is also an issue at bus garages and other such areas where there is a concentration of DEEE.

Safety

Artificial intelligence (AI) can play a role in identifying and flag objects in the sight of a camera that should not be there. Train drivers have to monitor up to two cameras per carriage door and there usually are two to three doors per carriage and up to twelve carriages per train. It would not be unusual for the driver to be expected to inspect 48

¹¹ [Section 362 of the FAA Reauthorization Act of 2018](#) required the FAA to commission a cabin bleed-air quality study by the Intermodal Transportation Environment-Airline Cabin Environment Research (RITE/ACER) Center of Excellence (COE). The tests conducted by the Naval Air Warfare Centre Aircraft Division (NAWCAD) simulated an engine oil leak but because this was a simulation the injections resulted in significant residual fluid being observed between injections that negatively affected the chemical analysis of these emissions. Despite this chemical analysis of the samples demonstrated that Volatile Organic Compounds were present in the bleed air stream to cabins when aircraft fluids are injected into the engine system. See [link](#)

¹² See article from [Flight Global](#)

cameras in 10 seconds to make that decision to move off or not. The driver in each case has to examine each screen in detail to determine if there is or is not someone or something in those doors. While sensors on the doors should highlight if there is an issue, they can miss things like belts, dog leads, bags straps etc. with potentially fatal consequences.

Accessibility

Capturing passenger data can help to identify if there is a need for improvements for particular groups such as disabled users, which can inform issues of accessibility, lighting, etc. However, there must be proper due regard to the use and storage of this data per GDPR rules.

Airlines determine the number of cabin crew and seating plans of aircraft by the type of passengers they intend to cater too. For a flight from Heathrow to New York JFK, there may be more business and first-class seating than on a flight from Stansted to Ibiza. Therefore, an understanding of the data and trends can identify what seat configurations could be expected on these flights. From this, numerous websites have sprung up, to calculate the carbon footprint of the flight. No such data is available on other transport options to determine if the service requires more space for wheelchairs, buggies or shopping.

Technology in the context of the next question means new and innovative ways to complete journeys, for example but not limited to the use of autonomous vehicles, electric scooters and e-hailing rides.

Q: How could technology be used to improve the transport network?

Passenger safety

Improved CCTV technology with monitoring and reporting mechanisms could alert police and other authorities to incidents of crime and harassment which are not reported or seen by drivers who need to have their attention on controlling the vehicle. This would help to inform and gather intelligence to identify and take action against perpetrators as evidence shows a significant rate of underreporting of incidents of sexual violence and sexual harassment, with 90% of women not reporting unwanted sexual behaviour on public transport¹³. This would also benefit the transport network as increased safety would encourage more people to use public transport.

Use of new technology

¹³ Transport for London: Written submission on: Evidence on Sexual harassment of women and girls in public places. [Link](#).

‘Smart’ technology in vehicles can assist transport drivers in controlling vehicles with autonomous safety which detects safety hazards and overrides the drivers’ with control features which control the vehicle in certain situations such as when a possible collision is detected, are already available across all transport modes. While Unite supports the use of technology to improve driver and road user safety, we are concerned about new technology being introduced without consultation and agreement of worker representatives (trade unions) to ensure:

- **Workers are ensured proper training.**
- **Workers are compensated for new skills.**
- **The technology doesn’t include monitoring and/or surveillance functions without agreement.**
- **There are clear and fair rules on any personal use.**
- **There are no negative health and safety issues.**
- **It will be introduced in a fair and equal manner.**

Q: How, if at all, would you improve the way decisions are made about the transport network?

As previously stated in this document, Unite believes transport planning decisions can be improved through ongoing engagement with trade unions and key stakeholders who represent groups of commuters particularly those representing women and disabled groups who are more likely to depend on public transport to access jobs, healthcare, childcare, education, goods and other essential services.

Any other comments?

Protections for transport workers

Many of the questions in this call for ideas focus on the use of technology and data to improve the transport network. While Unite supports the use of technology to inform and improve services, we are concerned that this call for ideas has not included questions about ways to improve the working conditions of transport workers who are at the forefront of service delivery.

While there are obvious benefits to AI alongside other technological advances, these will only benefit society if linked to strong protections for both citizens and workers. Developing legislation and new regulations to prevent the abuse and misuse of AI must be accompanied by effective collective bargaining machinery to ensure working people don’t pay the price of technological advances but benefit from the opportunities it provides.

Unite is concerned about the impact new technologies can have on jobs, job functions, role replacement and both workplace and public safety. Unite has been developing materials about new rights and protections that are required for both workers and trade

unions, including broadening the scope of collective bargaining agenda to ensure that the productivity dividend of developing technologies is fairly shared with working people – beyond narrow corporate interests and shareholder dividends.

Unite is calling for:

- **New rights and protections required covering the collection, holding and use of workers data and new agreements need to be sought through collective bargaining machinery to address both the development and introduction of technologies, including AI, and the impacts from it.**
- **New regulatory controls and industrial standards to be introduced to protect the public interest in areas where AI could be utilised in safety-critical areas to replace physical checks and human monitoring of fail-safe systems.**
- **New agreements needed covering areas from job security, shorter working time and job sharing without loss of pay, to new opportunities for securing our fair share of the common wealth we create, rights to retraining, upskilling and lifelong learning alongside, democratic and transparent oversight of information and data gathered as well as the use of AI at work.**

Long term strategy

Our public transport network requires a long-term government strategy. This was recognised in separate reports by parliamentary select committees in early 2015. The House of Commons Transport Committee called for an *“integrated transport strategy, which takes a route-based approach to road and rail investment, and prioritises connectivity to ports and airports”*. Additionally, the Public Accounts Committee called for the Department for Transport to *“set out a long term strategy covering the next 30 years for transport infrastructure in the UK, and use this strategy to inform decisions about investment priorities”*.

The transport sector should not just be valued on its considerable direct contribution to output and employment. It supports national and local economies in many other ways. Effective transport systems provide access to goods, services and jobs. Transport is essential to helping city regions to thrive, securing private sector growth across the country and improving exports to international markets and is essential to the development of rural economies.

However there has been a lack of investment in the UK’s transport infrastructure, and government has a key role to play. The National Infrastructure Commission in its National Infrastructure assessment found that transport networks are close to capacity in many UK cities. In respect of urban transport alone, it has called for £43 billion of additional

investment by 2040 to unlock growth in our cities. Therefore, Unite is calling for a transport strategy that includes:

- **A commitment to investment.**
- **Accessible, affordable, integrated and accountable public transport.**
- **A fundamental shift away from further privatisation and deregulation.**
- **Safe and healthy transport with decent employment standards, equality and protection from violence for transport workers.**
- **A sustainable transport system and a ‘just transition’ for transport workers.**

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