Report to: **Partnership Board - Transport for the South East**

Date of meeting: **24 January 2022**

By: **Lead Officer, Transport for the South East**

Title of report: **Responses to consultations**

Purpose of report: **To agree the draft responses submitted in response to various consultations**

RECOMMENDATIONS:

The members of the Partnership Board are recommended to agree the draft responses to the following consultations:

(1) Great British Railways Transition Team - Whole industry strategic plan for rail; call for evidence;

(2) Department for Transport - Future of Transport Regulatory Review Consultation;

(3) Gatwick Airport Limited – Northern Runway Proposals Consultation;

(4) Transport East – Draft Transport Strategy for the East Consultation;

(5) West Sussex County Council and Surrey County Council - Local Transport Plan Consultations;

(6) All-Party Parliamentary Group for the South East - Inquiry: financing the future - what does Levelling-up mean for South East England?; and

(7) Office of Rail and Road – Consultation on the Office of Road and Rail's role and approach to road investment strategy 3 (RIS3).

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1. Introduction

1.1 Transport for the South East (TfSE) has prepared responses to a number of recent consultations. This paper provides an overview of the responses to the following consultations:

- Great British Railways Transition Team - Whole industry strategic plan for rail; call for evidence;
- Department for Transport - Future of Transport Regulatory Review Consultation;

- Gatwick Airport Limited – Northern Runway Proposals Consultation;
- Transport East – Draft Transport Strategy for the East Consultation;
- West Sussex County Council - Local Transport Plan Consultation;
- Surrey County Council - Local Transport Plan Consultation;
- All-Party Parliamentary Group for the South East - Inquiry: financing the future - what does Levelling-up mean for South East England?; and
- Office of Rail and Road – Consultation on ORR's role and approach to road investment strategy 3 (RIS3).

2. Great British Railways Transition Team - Whole industry strategic plan for rail; call for evidence

2.1   In May 2021, the Government published its White Paper, the Williams-Shapps Plan for Rail[1] – the biggest reform to the railway in three decades. A new public body, Great British Railways (GBR), will run and plan the rail network, own the infrastructure, procure passenger services, and set most fares and timetables. This will mark the end of franchising rail passenger services. The White Paper included a commitment to develop a sector-wide, long-term strategy for rail – the Whole Industry Strategic Plan (WISP).

2.2   Setting up GBR (the railways 'guiding mind') and the railway's new ways of working will require primary legislation. Until then, the Government has asked Adrian Haines (Chief Executive, Network Rail) to lead a GBR Transition Team (GBR TT). TfSE officers had a useful initial meeting with representatives of GBR TT in September 2021. The creation of GBT TT was officially announced by the Secretary of State for Transport in October 2021.

2.3   The WISP will be the first strategy of its kind: a 30-year high-level plan shaped by a set of strategic objectives that ministers have given the railway. These objectives have been developed to benefit passengers, freight users, taxpayers and staff; to support Britain's nations, regions and communities to achieve their goals; and to benefit the economy and the environment for the long term. They are:

- Meeting customers' needs;
- Delivering financial sustainability;
- Contributing to long-term economic growth;
- Levelling up and connectivity; and
- Delivering environmental sustainability

2.4   On 9 December 2021, GBR TT published a Call for Evidence[2] for rail stakeholders to contribute to the evidence base to support the WISP. The Call for

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[1]
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/994603/gbr-williams-shapps-plan-for-rail.pdf
[2] https://gbrtt.co.uk/call-for-evidence-launch-document/

Evidence will "provide the opportunity for full and meaningful participation in the Strategic Plan's development, demonstrating our commitment to strengthening collaboration, as promised in the Plan for Rail, and reflecting the outward looking culture GBR will have". Responses to the Call for Evidence should provide as much evidence as possible, based on credible data or verifiable qualitative information (such as examples and case studies). TfSE has been able to draw on a considerable evidence base, including data and the outcomes from studies and demand modelling undertaken as part of the ongoing technical work programme.

2.5   The Call for Evidence provides six specific questions that can be used as a basis to respond. The draft TfSE response is set out in Appendix 1. The deadline for the submission of responses is 4 February 2022. Members of the Partnership Board are recommended to agree the response to this consultation.

3.   Department for Transport - Future of Transport Regulatory Review Consultation

3.1   In September 2021 the Department for Transport (DfT) launched a consultation to consider the areas of transport regulation that are outdated, a barrier to innovation, or not - designed with new technologies and business models in mind. This consultation covered four areas:
- zero emissions vehicles;
- maritime autonomy and remote operations;
- future of flight; and
- regulatory sandboxes.

3.2   This consultation closed on 22 November 2021 and a joint-STB response was submitted in advance of this deadline. This response is contained in Appendix 2 and related to the zero emissions vehicles element of the consultation. Members of the Partnership Board are recommended to agree the response to this consultation.

4.   Gatwick Airport Limited – Northern Runway Proposals Consultation

4.1   In September 2021, Gatwick Airport Limited (GAL) launched a 12-week public consultation on their proposals to bring the airport's existing Northern Runway into routine use, alongside the main runway. The proposed plans would allow departing aircraft to use the northern runway, by repositioning its centre line by 12 metres to enable dual runway operations. The proposals are currently at the pre-application stage of the Development Consent Order (DCO) process and Gatwick Airport Limited have indicated that they are unlikely to submit their application until the end of 2022 at the earliest. After the application for a DCO has been submitted, there will be further rounds of public consultation.

4.2   This consultation closed on 1 December 2021 and the officer level response that was submitted is contained in Appendix 3. The response confirms that TfSE

neither support or oppose GAL's Northern Runway Proposals at this time and highlights the need for further information to be provided to allow further assessment of the potential impacts of these proposals on noise, carbon emissions and surface access. Members of the Partnership Board are recommended to agree the response to this consultation contained in Appendix 3.

5. Transport East – Draft Transport Strategy for the East Consultation

5.1 In December 2021, Transport East launched an eight-week public consultation on their draft regional transport strategy for their area. Covering Norfolk, Suffolk, Essex, Southend-on-Sea and Thurrock, the strategy sets a series of priorities for better transport for everybody living, working, and learning in the region up to 2050.

5.2 This consultation closes on 30 January 2022 and the draft response is contained in Appendix 4. The response welcomes the approach that Transport East have taken with developing their draft transport strategy. The vision, strategic priorities and goals which form the document strongly align with those in the TfSE transport strategy. The strategy also sets a goal of decarbonising the transport network and achieving net-zero emissions by 2040. Members of the Partnership Board are recommended to agree the draft response.

6. West Sussex County Council and Surrey County Council - Local Transport Plan Consultations

6.1 Several Local Transport Authorities from across the TfSE area are currently in the process of revising their Local Transport Plans (LTP). The LTP is a statutory document required of each local transport authority. The LTP sets out the long-term strategy, policies and schemes to address the transport challenges and deliver transport improvements across the local transport authority's area.

6.2 The consultation on Surrey County Council's LTP ran from 5 July to 24 October 2021 and the consultation on West Sussex County Council's LTP ran from 16 July to 8 October 2021.

6.3 Transport for the South East has submitted officer level responses to both West Sussex County Council and Surrey County Council in response to the consultation on their draft LTPs. Copies of the TfSE responses to these consultations are contained in Appendices 5 and 6. Members of the Partnership Board are recommended to agree these draft responses.

7. All-Party Parliamentary Group for the South East - Inquiry: financing the future - what does Levelling-up mean for South East England?

7.1 In December 2021 the All-Party Parliamentary Group (APPG) for the South East launched an inquiry into what levelling-up means for South East England. The

APPG was keen to hear from organisations and individuals on expectations, requirements and concerns related to the Government's intended 'Levelling up' agenda.

7.2   This consultation closed on 12 January 2022 and the officer level response that was submitted is contained in Appendix 7. The response outlines how the devolution of strategic transport planning powers can support the Government's levelling up agenda. In addition, the need to adapt funding approaches to enable public and private sector partners to better plan and deliver the types of schemes that can bring about transformational change. Members of the Partnership Board are recommended to agree the response to this consultation set out in Appendix 7.

8.   Office of Rail and Road – Consultation on ORR's role and approach to road investment strategy 3 (RIS3)

8.1   In preparation for the third road investment strategy (RIS3) process, the Office of Rail and Road (ORR) are seeking views on their proposed approach to assessing the challenge and deliverability of plans for the third road investment strategy. The road investment strategy is the Government's long-term strategy for the management and improvement of the strategic road network in England.

8.2   This consultation closes on 28 January 2022 and the draft response is contained in Appendix 8. The response supports the approach that has been proposed by the ORR. Members of the Partnership Board are recommended to agree the response to this consultation set out in Appendix 8.

9.   Conclusion and recommendations

9.1   The members of the Partnership Board are recommended to agree the draft responses to the consultations that are detailed in this report.

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Whole Industry Strategic Plan (WISP) Call for Evidence Response from TfSE

1 Introduction and Role of TfSE

Introduction

1.1 This document provides Transport for the South East's (TfSE's) response to a Call for Evidence[1], issued by Great British Railways Transition Team (GBRTT) to inform the development of a Whole Industry Strategy Plan for the British rail sector.

1.2 This document starts by describing the role of TfSE and our interest in the future development of the rail network, particularly the part of the network that serves South East England. We follow this by setting out the context that is informing our response, and then provide detailed responses to each of the questions included in the Call for Evidence document.

The role of TfSE

1.3 TfSE is the sub-national transport body for the South East of England. Our purpose is to determine what investment is needed to transform our region's transport system and drive economic growth. We were established in 2017 to determine what transport infrastructure is needed to boost the region's economy. Our role is to add strategic value by making sure that funding and strategy decisions about transport in the South East are informed by local knowledge and priorities.

1.4 Our partnership is made up of 16 local authorities, five local enterprise partnerships plus representatives of district & borough authorities, protected landscapes, and national delivery agencies. Our region – covering the historic counties of Berkshire, Kent, Hampshire, the Isle of Wight, Surrey, East Sussex, and West Sussex – is the second most productive in the country behind London. It is home to 7.5 million people and more than 300,000 businesses, an economy of over £400bn (GVA per annum) and is our nation's key international gateway for people and goods. It boasts world-leading universities and research institutes, diverse towns and cities and stunning coasts and countryside. It is a great place to live, work, study, visit and do business. Our focus is on ensuring that this success story continues.

1.5 Our Strategic Investment Plan, which we will consult on in mid-2022, will state our priorities for the future direction of, and investment in, the rail network that serves South East England. This includes all of the network currently managed by Network Rail's South East Route, Wessex Route, and parts of the Western Route. We are also interested in the role and future of High Speed 1 in serving Kent and East Sussex, as well as international rail markets.

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[1] GBRTT (2021), "Call for Evidence", **https://gbrtt.co.uk/call-for-evidence-launch-document/**, accessed December 2021

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2 Strategic Context

Strategic Vision

2.1 In July 2020 TfSE adopted an ambitious transport strategy that sets out the following vision:

> "By 2050, the South East of England will be a leading global region for net-zero carbon, sustainable economic growth where integrated transport, digital and energy networks have delivered a step change in connectivity and environmental quality. A high-quality, reliable, safe and accessible transport network will offer seamless door-to-door journeys enabling our businesses to compete and trade more effectively in the global marketplace and giving our residents and visitors the highest quality of life."

2.2 This vision covers a **30 year period** from the date of the adoption of the Strategy in 2020 to 2050. It therefore aligns with the 30 year timeline for the WISP. Our Strategic Investment Plan will set out in more detail how we envisage our strategy will be delivered throughout this period. This will include elements to be delivered in the next 5 years, 10 years, and 30 years. We envisage most of the larger rail infrastructure interventions (other than those that are already developed to a high level of readiness of implementation) would be delivered in the latter half of the 30 year period, but we would aspire to see most operational interventions delivered in a shorter timeline.

2.3 TfSE believes Britain's railways are well placed to support the vision outlined above. However, it is worth exploring which circumstances are most appropriate to potential rail interventions (and, by implication, future investment in rail schemes).

Where Rail Works Best

2.4 Passenger rail services are capable of transporting high volumes of passengers through relatively narrow corridors at relatively high speeds. In most circumstances, passenger rail services are faster, cleaner (both in terms of carbon and air pollution), more space efficient, and safer than road transport. Their competitive advantage against the car is particularly powerful in large urban areas, where average traffic speeds are often below 10mph[2]. Rail is also very effective for journeys covering longer distances, especially if the service is operating on a high quality railway.

2.5 The key advantages of railways are as follows:

- Passenger rail services are capable of operating at a much higher **speeds** (typically 90 – 125mph on mainlines in South East England) than the highway speed limits (70mph).
- Most passenger rail services in South East England are powered by **electricity** (and some railways will soon be powered only by renewable energy)[3].

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[2] Brighton and Hove City Council (2018) "Brighton & Hove Bus Network Review 2018", Table 5, **https://www.brighton-hove.gov.uk/sites/default/files/migrated/article/inline/bus-network-review-2018.pdf**, accessed November 2020

[3] Railway Gazette (2020) "HS1 Ltd sets green targets", **https://www.railwaygazette.com/uk/hs1-ltd-sets-green-targets/57626.article**, accessed November 2020

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- Modern railways are capable of comfortably accommodating more than double the **capacity** of the highway[4] (for a fraction of the space).
- Passengers using the rail services are able to be transported to the centre of cities **without needing to have access to a car**, be qualified to drive, or find (and often pay for) a suitable location to park their car.
- Railways are the **safest** way of travelling on land)[5] and the recent safety record of railways in Great Britain has been improving and is comparable to the safest railways in Europe.

2.6   However, it is important to understand the limitations of rail compared to other modes:

- Railways are relatively **costly** to build, maintain, and operate, and this is reflected in fares that are often unaffordable for many people.
- Rail is rarely able to deliver a complete **point-to-point journey**, and its stations are not always located in places that make it easy to transfer to other modes.
- Rail is relatively inefficient, and therefore costly, in transporting small numbers of passengers over **short distances**. Railways that serve small markets typical require significant government support to survive.
- Rail is rarely a viable option for **very long-distance journeys** (e.g., from the UK to holiday destinations in southern Europe) due to long journey times and higher costs over these distances.
- Rail freight is relatively **inflexible** and expensive compared to road options, especially when carrying smaller volumes.

In summary, Rail has an important role to play in helping TfSE deliver its strategy. Rail can transport large volumes of people quickly, safely, efficiently, and in an environmentally sustainable way. That said, rail is much less competitive for short door-to-door journeys.

Rail Modal (Market) Share – the "size of the prize"

2.7   In line with most European countries, the railways in Great Britain have a relatively low mode share compared to highway transport. TfSE studies estimate around 4% of trips in the South East are currently undertaken by rail, while the rail modal share in the UK in 2018 was just over 9%.

2.8   The UK rail mode share is higher than many European countries, as shown in Figure 1, and exceeds the average across the European Union. However, the UK's rail mode share is lower than some European countries, including Switzerland, where rail mode share is more than twice as high as the UK. While each European country has its own characteristics, the fact that mode share is higher in countries with similar population densities to the UK suggests there is potential to grow the UK rail's mode share.

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[4] The Department for Transport's estimates HS2 will deliver additional capacity approximately equal to two, three-lane motorways (source: DfT (2013), "The Strategic Case for High Speed 2", paragraph 3.2.11, **https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/260525/strategic-case.pdf**)

[5] Technically aviation is safer on a passenger km basis: Department for Transport (2020) "Passenger casualty rates for different modes of travel (RAS53)", **https://www.gov.uk/government/statistical-data-sets/ras53-modal-comparisons**, accessed November 2020

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Figure 1: Rail mode share in European countries (2018)
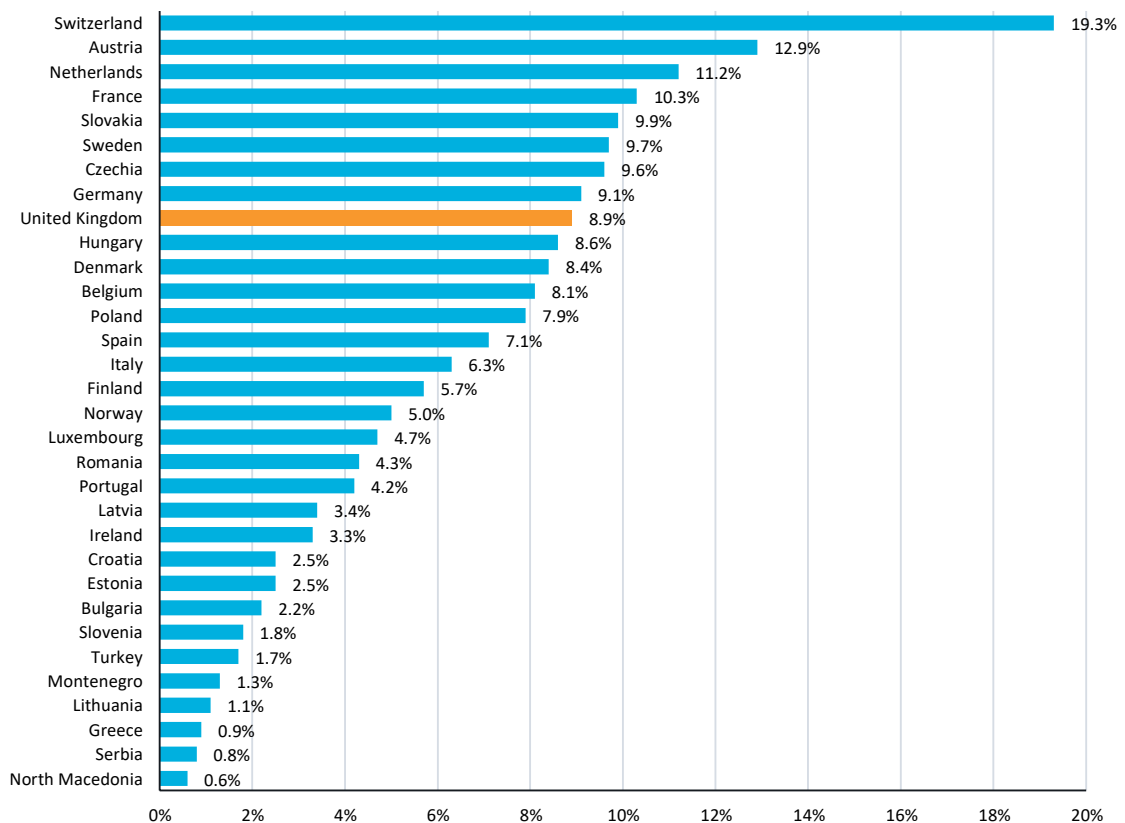
Source: Eurostat

2.9 The government's Transport Decarbonisation Plan[6] has a key section on the role of rail transport. Rail has a critically important role to play in delivering TfSE's ambitious vision and strategy for a net-zero carbon transport system. Rail is most competitive in attracting passengers and most economically efficient when it focuses on high volume commuter and longer distance journeys.

> In summary, while rail mode share in Great Britain is higher than the European average, with the right policies and investments, it should be possible to grow this mode share towards levels seen in Switzerland, Austria, and the Netherlands.

Issues and opportunities

2.10 Through our technical work and stakeholder engagement to date, we have identified the following key issues and opportunities for the rail network in South East England:

- **Affordability**: The South East's railways need to provide batter value for money, simplify fares, and offer passengers more flexibility. This could include a more flexible part-time

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https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1009448/decarbonising-transport-a-better-greener-britain.pdf

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season ticket offer or cheaper single leg pricing (although this could have an expensive impact on rail revenues).

- **Capacity**: Prior to the COVID-19 pandemic, over-crowding was a significant problem on some services and corridors. Other than demand-management, the remaining solutions are based on infrastructure investment, so are not cheap. There is a range of options for expanding/managing capacity on each corridor, which will be dependent on the particular constraints and opportunities on each corridor. Particular bottlenecks include:
  - Several London termini:
    - Great Western Main Line (Reading – London)
    - South Western Main Line (Woking – London)
    - Brighton Main Line (Gatwick – London)
    - South Eastern Main Line (Chislehurst – Tonbridge)
  - High Speed 1 (St Pancras International station platforms)
  - Southampton Central station and tunnels
  - Chatham Main Line (Rochester Bridge and junction).
  - Challenges with some level crossings (Totton, West Worthing, East Guldeford, Canterbury).
- **Connectivity**: Improving orbital (east – west) services and rail's offer for coastal communities would significantly improve rail connectivity in South East England and improve its competitiveness compared to the car. This is discussed in more detail below. Reduced peak demand for travel to work (especially to/from central London offers chances to create or restore more direct passenger links by train (e.g., Kent/Gatwick), as well as free up potential train paths for freight.
- **Performance and resilience**: If performance declines people feel they cannot trust rail as a mode of transport. Planned infrastructure investment at capacity bottlenecks will improve performance, but service planning and how train operators are incentivised also need to address the issue.
- **Carbon**: The high levels of electrification of the South East's railway means it is particularly well placed to make a significant contribution to the wider decarbonisation agenda. Filling the remaining, non-electrified gaps will ensure the railway can reach carbon neutrality as soon as possible, while also helping improve the cost and operational efficiency of the railway. The opportunity should be taken to generate and distribute renewable energy extensively on the Network Rail/GBR estate – especially taking account of rising electricity prices. Likewise, the railways operations, maintenance, and renewals (OMR) functions should address their own specific carbon impacts.
- **Integration**: Better integration between modes would increase demand for travel by rail, While London is a model for integration between modes, it is not possible to roll this out across the South East. However other organisations such as Transport for the North and Solent Transport are already developing plans to improve rail integration and there are undoubtedly innovative approaches that TfSE could use to do so, alongside working with local councils to highlight the need for appropriate levels of financial support for the railway.
- **Accessibility:** While there has been good progress in improving accessibility for people with mobility impairments in recent years, significant issues remain. Accessibility in the broadest terms is a key barrier to many users. The Williams Rail Review identified this is a key challenge for the rail industry. The DfT's "Access for All" programme has unlocked some investment in some rail stations, but there is much more scope to go much further.

- **International gateways**: Direct rail services to Heathrow Airport from the West and South would significantly improve public transport access to this key international gateway and help reduce congestion on the South West quadrant of the M25. Improved rail access to Gatwick from Kent would also relieve pressure on the road network.
- **Freight**: Rail freight has a role to play in supporting sustainable economic growth by providing a clean and efficient way of moving freight that would (likely) otherwise by transport on congested highways. Rail freight is growing [ref]; solutions need to be found that allow still more growth, including better local rail freight handling facilities and train path allocation on the network.
- **Growth**: Rail can play a significant role, through the access and connectivity it provides, to encourage inward investment, support economic growth, new development (for both housing and jobs) and regeneration.
- **Non-London markets**: Before 2020, there was less focus on markets for rail travel to destinations other than London. Carefully designed marketing campaigns and attractive fares could strengthen rail's market share, resulting in more passenger revenue and a greater contribution towards decarbonisation.
- **Devolution**: There may be opportunities to reconsider the former franchise map in light of the wider rail reform and devolution agendas. There also may be a case for managing smaller routes separately in order for focus not to be drawn away to the larger London market.
- **Technology**: Advances in technology will enable rail to fully contribute to TfSE's objectives, and many are already in use or being tested. These include contactless payment, alternative traction options (specifically hydrogen and/or battery power), new signalling systems (to increase the capacity of the network) and improved on-train Wi-Fi (making time spent on trains productive). Innovation in Mobility as a Service (MaaS) may also facilitate growth in rail demand by unlocking more 'travel blending', although there are risks that such technologies could undermine public transport and increase road congestion.

2.11   TfSE is supportive of any initiative, including the WISP, that helps address these issues and leverage the opportunities summarised above.

Connectivity challenges

2.12   Building on some of the issues outlined above, we would like to share some insights from TfSE's research into rail connectivity in the South East.

2.13   In October 2020, TfSE commissioned Steer to develop a national gravity model to identify if there are any obvious, significant gaps in the Strategic Road Network and the national rail network connecting national centres with the South East region. The results indicate that the South East's highways and rail network do have some gaps that present challenges at a regional and local level.

2.14   The analysis found there is poor rail connectivity across most of the South Coast, particularly between Southampton, Portsmouth, Chichester, Brighton, Eastbourne, and Hastings. Figure 2 below underlines the relatively low connectivity (shown as average speed between key stations) on this corridor.

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Figure 2: Average speed of passenger rail services on key South East corridors
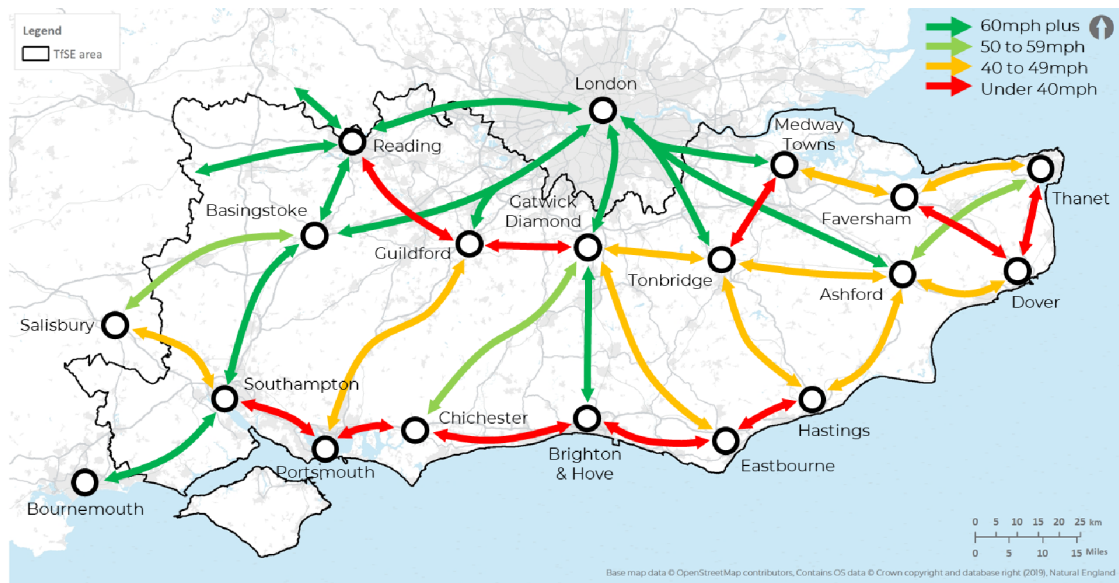
2.15 The analysis also found similar issues between Major Economic Hubs in Surrey and Berkshire often on similar corridors highlighted as having highway connectivity gaps. It also highlighted potential value in delivering improvements to rail services between: South Hampshire/Brighton and Bristol, the Midlands, and the North; and local services to Farnborough and Aldershot. In our view, this research also strengthens the strategic case for improvements along the North Downs Line corridor (Reading-Guildford-Redhill-Tonbridge).

2.16 Figure 3 and Figure 4 below highlight the key connectivity gaps within the South East and between the South East and the rest of the country, which TfSE would like to see addressed. These were identified by using a gravity model to estimate the latent demand between the South East's Major Economic Hubs and compare the quality of road and rail provision (categorised by capacity provision and the standard of highway/railway service provided) that serve the corridors with the highest "theoretical" demand. The key gaps shown below represent corridors with a modelled high demand but relatively poor highway/rail provision.

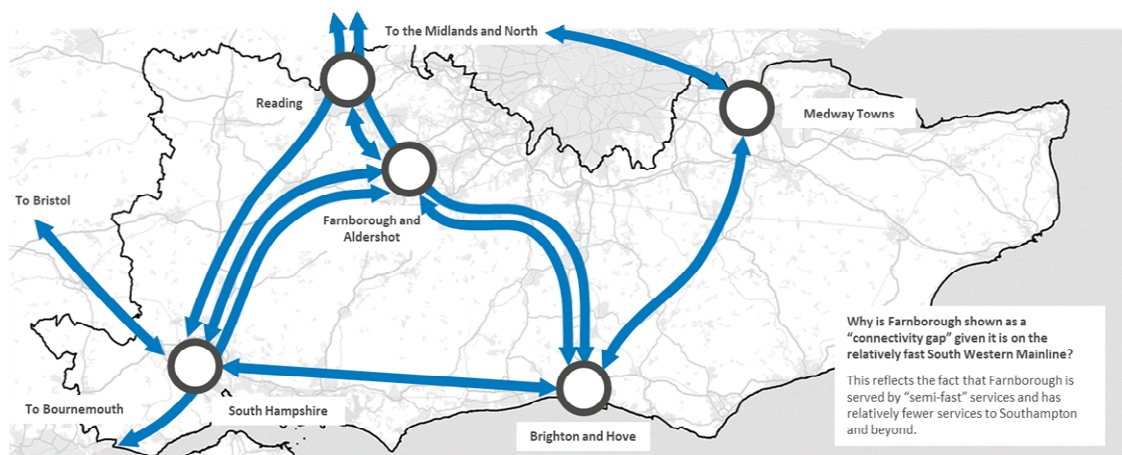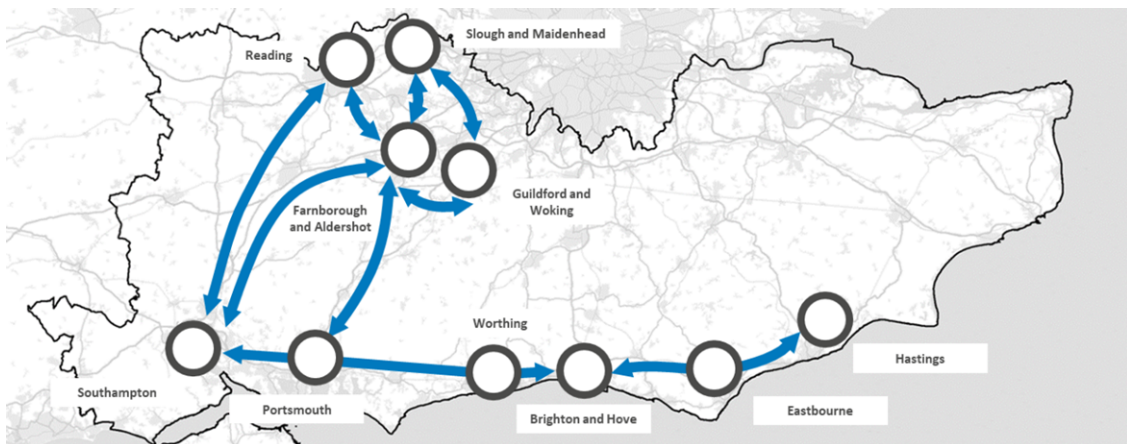**Figure 3: Connectivity gaps in South East England (regional level)**

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Longer Term Trends, Scenario Planning and Uncertainty

2.17   In 2018 and 2019, TfSE worked with a wide range of partners and stakeholders to develop alternative future scenarios that describe different visions for the future economy, spatial distribution of people and jobs, and demand for travel in the South East area. This was done in the context of a "vision and validate" approach that encourages stakeholders to describe the future they wish to see, as opposed to a traditional "predict and provide approach", which extrapolates existing trends to project a future that may not be in line with stakeholder aspirations. This approach reflects best practice for long range planning and encompassing inherent uncertainty.

2.18   This was achieved by asking stakeholders to:

- identify plausible disruptions to trends that would lead to a wider spectrum of future outcomes; and
- use the insight gained to derive a preferred future which would drive the development of strategy, policy, and interventions.

2.19   As part of this exercise, TfSE worked with leading experts in transport policy and forecasting to identify the most important drivers in transport behaviour. The same group was also asked to assess the certainty of these drivers. The key drivers identified by this group are listed in **Error! R eference source not found.** below. Those drivers considered to have the highest levels of uncertainty are highlighted in bold.

2.20   The most uncertain drivers listed above were developed further and are summarised in **Error! R eference source not found.** below:
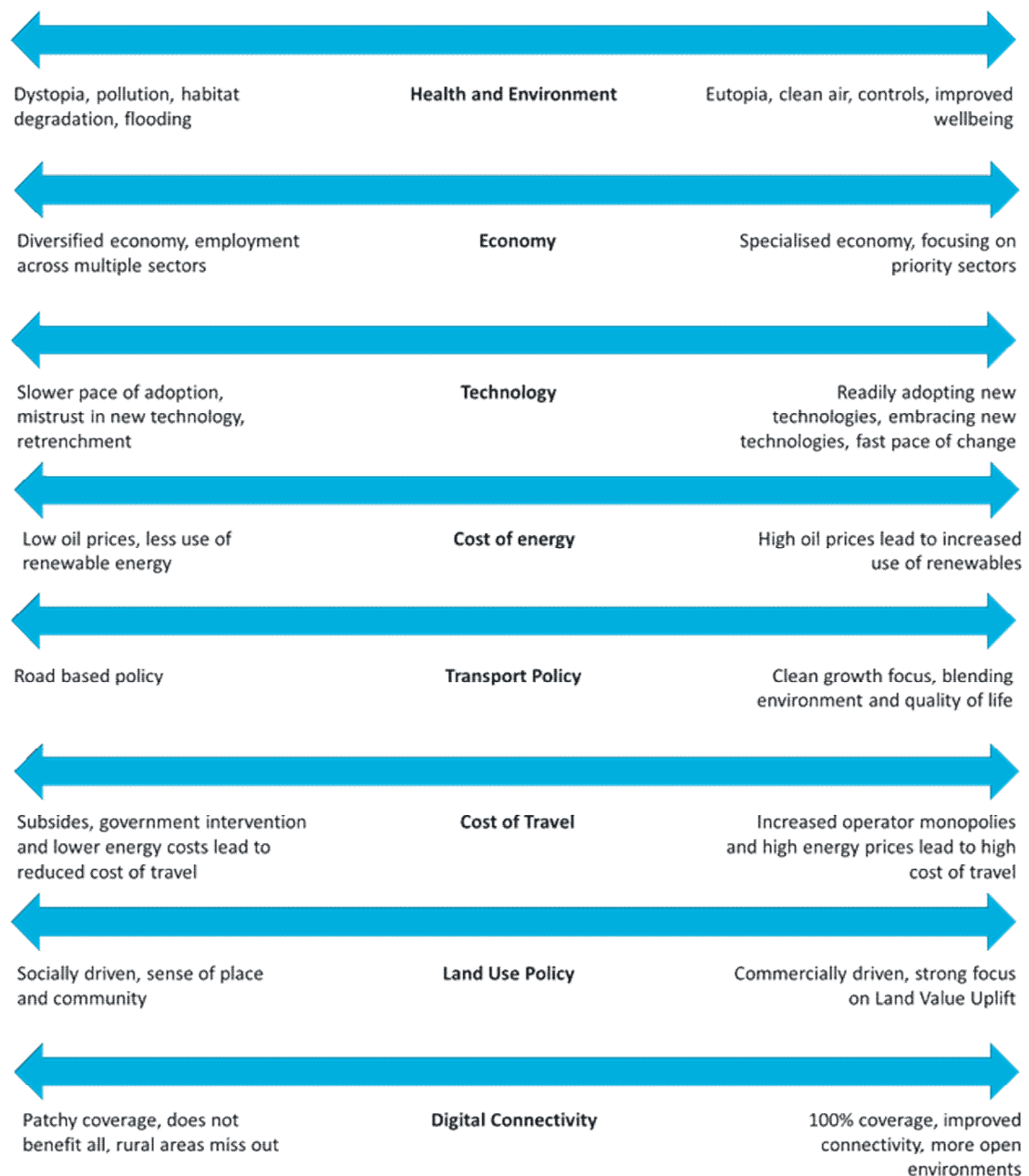
Table 1: Key drivers identified in TfSE scenario development

Drivers with Most Uncertainty	Drivers with Less Uncertainty
Economy	Industry
Cost of travel	Relationship with London
Land use policy	Where people work
Transport policy	Where people live
Technology	Commuting
Digital connectivity	Education
Energy cost	Retail

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Drivers with Most Uncertainty	Drivers with Less Uncertainty
Health/environment	Mobility-as-a-Service
	New transport mode
	Demographics
	Socio-cultural shift
	Social inclusion
	Leisure opportunities
	Climate change

Figure 5: Uncertain drivers

	Health and Environment	
Dystopia, pollution, habitat degradation, flooding		Eutopia, clean air, controls, improved wellbeing
Diversified economy, employment across multiple sectors	**Economy**	Specialised economy, focusing on priority sectors
Slower pace of adoption, mistrust in new technology, retrenchment	**Technology**	Readily adopting new technologies, embracing new technologies, fast pace of change
Low oil prices, less use of renewable energy	**Cost of energy**	High oil prices lead to increased use of renewables
Road based policy	**Transport Policy**	Clean growth focus, blending environment and quality of life
Subsides, government intervention and lower energy costs lead to reduced cost of travel	**Cost of Travel**	Increased operator monopolies and high energy prices lead to high cost of travel
Socially driven, sense of place and community	**Land Use Policy**	Commercially driven, strong focus on Land Value Uplift
Patchy coverage, does not benefit all, rural areas miss out	**Digital Connectivity**	100% coverage, improved connectivity, more open environments

2.21   The drivers presented above were combined to develop four hypothetical, yet plausible scenarios for the future South East economy and transport system (up to 2050):

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- London Hub – which assumed significant growth (and dominance) of London;
- Digital Future – which assumed an accelerated take up of emerging technologies;
- Our Route to Growth – which envisaged a more "self-sufficient" South East supported by stronger Major Economic Hubs; and
- Sustainable Future – which envisaged a significant shift to policies that protect and enhance the environment.

2.22   The resilience of the TfSE transport strategy to 2050 was then tested against each of the four future scenarios. Some of the interventions tested were, therefore, relatively exaggerated for scenario testing purposes and do not necessarily reflect Transport for the South East's view of their desirability or likelihood. However, these scenarios helped TfSE, and its partners define a preferred scenario for the future of the South East. This scenario, named "Sustainable Route to Growth", combined elements of the four original scenarios.

2.23   All five scenarios were modelled using a Land Use Transport Interaction Model (SEELUM – the South East Economics and Land Use Model). The results of each scenario were compared to a "Business As Usual" scenario, which projected forward central, more trend-based forecasts from government (generally based on the DfT's National Trip End Model).

2.24   A summary of the results of this exercise are presented in the Appendix and more fully in a published technical report (**accessible here**). However, the key findings from this exercise are summarised below:

- TfSE's Preferred Scenario (the Sustainable Route to Growth) generates a significant increase in trips from London to the South East area (up 47% compared to the Business as Usual scenario) as many people from outside the South East are attracted to [new?] employment opportunities within the area. Trips within the South East area and from the South East area to the rest of the country are 4% higher, which is driven by high growth in the South East's major economic hubs.
- While the number of trips is higher than in the Business as Usual scenario, many are being undertaken by sustainable modes. Bus and rail use is significantly higher (by 120% and 108% respectively compared to the Business as Usual scenario) and car trips are lower (down 9%). However, walking and cycling trips are also lower in comparison (7% less) due to the relative decline in cost of other modes.
- This scenario generates significant growth in radial trips on the rail network. However, much of this growth is in the contra-peak direction, which means it should be straightforward to accommodate this growth where there is currently spare capacity.

In summary, TfSE's Preferred Scenario for the future South East economy and transport system (the "Sustainable Route to Growth") would see a significant increase in demand for rail trips – although this would be tempered by recent impacts of the COVID-19 pandemic

2.25   TfSE's current work in preparing a Strategic Investment Plan (for consultation in 2022) will include packages of interventions that our model suggests could generated 100,000s of additional rail trips per day. We would be happy to present these results to the WISP team in more detail when our modelling is complete, towards the end of March 2022.

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3 Responses to Questions

Question 1 – Objectives

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Question 1

How would you apply these objectives to rail in your region or to your area of expertise within the transport sector? Do you have evidence you can share with us of how you have applied similar objectives in relation to rail, and do you consider the objectives to have missed any key areas?

How is it possible to make progress against a number of the objectives simultaneously? Do any of the objectives have larger barriers associated with them than others, or do any objectives pose possible barriers to others? Where would you make the trade-offs?

What long-term trends in wider society, the economy, and the environment will affect these five objectives over the next 5, 10, and 30 years? Please give evidence to support your response.

What are the key uncertainties you consider that the Strategic Plan must be resilient to in order to be effective over the next 5, 10 and 30 years?

Over the next 5, 10 and 30 years, which steps should the sector take to improve integration of rail with the wider transport system (including walking and cycling) in pursuit of these objectives?

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WISP Objectives

3.1 TfSE published its Transport Strategy for the South East in 2020. This document sets a vision for the South East, three overarching objectives (one for the economy, one for society, and one for the environment), and fifteen priorities. Many of these priorities map to the WISP objectives. This shows a high degree of alignment with the WISP objectives and our own priorities. Table 2 below presents a simple mapping of TfSE's objectives and priorities to the WISP objectives.

Table 2: TfSE Objectives and Priorities mapped to WISP Objectives

TfSE Objective	TfSE Priority	WISP Objective
Economic Improve productivity to grow our economy and better compete in the global marketplace	Improving connectivity between major economic hubs, ports, and airports.	Contributing to long term economic growth Levelling Up and Connectivity
	More reliable journeys.	
	A more resilient network.	
	Better integrated land use and transport planning.	
	A digitally smart transport network.	
Social Improve health, wellbeing, safety, and quality to life for everyone.	Promoting active travel and healthier lifestyles.	Delivering environmental sustainability
	Improving air quality.	
	An affordable, accessible transport network that's simpler to use.	Meeting customers' needs

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TfSE Objective	TfSE Priority	WISP Objective
	A more integrated transport network where it is easier to plan and pay for door-to-door journeys.	
	A safer transport network.	
Environmental Protect and enhance the South East's unique natural and historic environment.	Reducing carbon emission to net zero by 2050 at the latest.	Delivering environmental sustainability
	Reducing the impact of, and the need to, travel.	
	Protecting our natural, built, and historic environments.	
	Improving biodiversity.	
	Minimising resource and energy consumption.	

3.2 We see significant potential in applying the WISP objectives to the South East of England. There are examples in the South East where the WISP objectives are pertinent, and these are outlined for each WISP Objective below.

Complementary and competing objectives

3.3 There are many examples where the objectives set out in the Call for Evidence appear to be complementary. For example, the objective to achieve high customer satisfaction should encourage modal shift from road to rail, which, in turn, should boost revenue (improving industry finances) and enable more environmentally sustainable travel outcomes.

3.4 On the other hand, there are objectives that might work against each other. For example, reducing rail service provision might help reduce the cost of the rail industry to government in the short term, but this could be to the detriment of other objectives, including:

- **customer satisfaction** – customers will be less able to meet their travel needs if rail services are cut. This may not then be picked up through rail user surveys;
- **levelling up** – relatively isolated communities will be further isolated if rail services are cut; and
- **environmental sustainability** – cutting rail services might deter people from choosing rail over less sustainable travel options.

3.5 We have also identified several trade-offs to consider, including:

- **financial constraints** – it is difficult to see how the WISP objectives as a whole can be achieved without investing in maintaining and improving the railways, and this may conflict with the financial sustainability objectives outlined in the Call for Evidence;
- **rail network capacity** – there are trade-offs between maximising use of available capacity on the railway and the robustness of the timetable (and ease of recovery from perturbation). Likewise, there are trade-offs between how capacity is allocated in the railway, particularly between different passenger and freight markets (e.g., the NR South East Route needs to balance demand from its London and Kent/Surrey/Sussex passenger markets, while also providing enough paths for freight traffic);
- **competition with other transport models (e.g., active travel and bus)** – there is a risk that significantly improving rail in the absence of improving active travel infrastructure will result in modal shift from cycling/walking to rail (which is a less sustainable change

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than from car to rail), and/or could dilute revenues that support local bus services (rendering these services less financially viable); and

- **levelling up and climate change** – stimulating investment and growth in less prosperous areas is a laudable aim, but it will inevitably stimulate economic activity that might generate higher carbon emissions.

3.6   If TfSE were asked to take a position on any of the trade-offs listed above, we would choose the following:

- **financial constraints** – support increased investment in the rail industry (particularly invest-to-save), acknowledging the rail industry's finances will remain stressed in the short term;
- **rail network capacity** – adopt a position driven by the context of each capacity constraint, while acknowledging rail is generally better suited to serve middle/longer distance journeys;
- **competition with active travel** – prefer to see both rail and active travel mode share grow, noting there is evidence that growing one can feed the other[7]; and
- **levelling up and net-zero carbon emissions** – seek to address this by actively mitigating carbon impacts that arise through Levelling Up investment, including through Central Government support for policies that accelerate decarbonisation across the whole country.

Question 2 – Passenger Expectations and Freight

Question 2

Passenger: how will rail passenger expectations, including accessibility requirements, evolve over the coming 5, 10 and 30 years, what will be the driving causes of these changing expectations, and how can they be most effectively met by the rail sector?

Passenger: in your experience, how can we most effectively monitor and assess customer satisfaction? What is a stretching yet realistic ambition for this objective and what measures can we most effectively use to consider success over the coming 5, 10 and 30 years? What evidence can you share to support your view?

Freight: what evidence can you provide regarding the advantage(s) of transporting goods by rail and what evidence can you share for how that could develop in the next 5, 10 and 30 years? What do you consider to be the most effective role for rail freight in the existing supply chains served and those that it doesn't? How could this change over that period? In answering, please explain and take account of likely developments in technology and in the wider economy.

What is a stretching yet realistic ambition for this objective and what measures can we most effectively use to consider success over the coming 5, 10 and 30 years? What are the interventions over that period which will be the maximum value for money, and what evidence can you share to support your claim?

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[7] Jappinen, Toivonen, and Salonen (2013) "Modelling the potential effect of shared bicycles on public transport travel times in Greater Helsinki: An open data approach" **https://www.sciencedirect.com/science/article/pii/S014362281300132X**, accessed December 2021.

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Stakeholder needs

3.7   TfSE has not commissioned research into rail passenger expectations *per se*, but we have consulted widely with stakeholders in the South East to understand their needs and aspirations for the railway.

3.8   Our research has found that stakeholders in the South East wish to see, for example:

- Decarbonisation of the whole transport system (including rail electrification).
- Significant improvements to urban mass transit systems, which in the Solent Area could include a heavy rail metro service offer.
- Significant improvements in east – west rail/Cross County connectivity (improvements to journey times and frequency).
- More rail capacity on routes where the current railway is unable accommodate the needs of long distance passenger, local passenger, and rail freight customers.
- Improvements to the Marshlink railway to enable local stakeholders in East Sussex and Kent to realise future aspirations for this railway.
- Better value for money / lower rail fares.
- A more accessible rail network, especially for those with mobility challenges.
- More integrated fares, ticketing, and information on the rail network.
- A more resilient railway (which could include a second London – Brighton route in the longer term).
- More 24/7 services, particularly at airports and major towns and cities.
- Faster services for the more isolated communities, particularly those on the coast.
- Improvements to connections to airports (e.g., Heathrow western and southern rail access projects, Kent-Gatwick).

Future passenger needs

3.9   TfSE has developed a **Future Mobility strategy** that explored how customer characteristics and needs might evolve in the coming decade. These changes include:

- **Age** – the young and the old are less likely to have access to cars and rely on public transport. The younger generations are more engaged with innovations leaving older generations behind.
- **Background** (ethnicity, religion, culture, race, ethnicity, language) – cultural needs and differences are often overlooked when considering transport interventions and services, language can also be a barrier to behavioural change and safety and security is a key consideration for many ethnic minorities.
- **Gender and sexuality** – some people are more affected by personal security issues when travelling than others, leading to fear of travel at certain times or in certain locations. Technology is also often designed from a male perspective.
- **Disability** – people with physical and hidden disabilities are underserved by mobility with infrastructure required above minimum standards.
- **Life-stage** – users of transport and mobility options can have different accessibility needs depending on their stage of life. Families with children will require greater access to education establishments but also may require more space in vehicles to allow for prams or buggies. Retired people may have more flexibility in when they travel than those in work, but they may be less able to use active modes and have specific accessibility needs.

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- **Employment status** – mobility affects employment status through proximity and ease of access to workplaces. While the ability to work remotely or from home affects the need for travel.
- **Affluence** – affordability of different transport modes strongly influences choices and where choice is limited users may be forced to use less affordable modes. In rural areas, people spend higher proportions of income on travel due to the reliance on private car use and ownership.
- **Household make-up** – Household make-up can impact transport requirements and choices. A car shared across multiple household residents may be more affordable than for a single occupancy household. However, travel as a large household by publicly-available modes can be more expensive.
- **Access to banking** – there remains a significant proportion of the population that do not have bank accounts and make payments only with cash. This can limit access to modern payment systems

3.10 The Future Mobility Strategy developed four "bundles" of future mobility interventions that could be applied to four different typologies of places: Major Economic Hubs, Urban Settlements, Rural Settlements, and Remote Rural areas. Further detail is provided in the published report[8].

Freight

3.11 South East England is home to some of the busiest ports and airports in the UK – including the Channel Tunnel and Channel Ports. TfSE is supportive of investment in interventions that improve connectivity between our key international gateways and the rest of the country.

3.12 Historically, freight has been heavily reliant on road transport. TfSE is keen to promote greater use of rail. Some ports have been successful in this regard, such as the Port of Southampton, which reportedly enjoys a rail mode share of around 40%[9] and the port's masterplan[10] has ambitions to increase this percentage as the port grows.

3.13 TfSE is publishing a freight, logistics and international gateways strategy to identify what investment is needed to better connect our region's ports, airports, and international rail links, supporting sustainable economic growth here in the South East and across the UK.

3.14 To drive this work forward, we created a steering group and a wider industry forum bringing together partners from across the freight and logistics sector, local authorities, national agencies, and transport bodies. Together, they have provided the energy, enthusiasm and investment needed to accelerate our journey towards a better connected, more productive, and more sustainable future.

3.15 Work on this started in early 2021 and our new draft Freight Strategy and Action Plan is due to be considered for acceptance and publication by TfSE's Partnership Board on 24 January 2022. The strategy is providing inputs into both our area studies and our Strategic Investment Plan (SIP) for the South East. A draft SIP is due for publication for consultation in summer 2022. We

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[8] TfSE "Future Mobility Strategy" (2021) **https://transportforthesoutheast.org.uk/app/uploads/2021/07/Future-mobility-strategy-Final-report.pdf**, accessed December 2021.

[9] Figure provided by the Port of Southampton at a TfSE Stakeholder event

[10] **https://www.southamptonvts.co.uk/admin/content/files/New%20capital%20projects/Master%20Plan%202016/Master%20Plan%202016%20-%202035%20Consultation%20Document%20Oct%202016.pdf**

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would be delighted to share our evidence base, insights, and recommendations from our freight studies with GBRTT and Network Rail.

3.16 Whilst our draft SIP is still under development at present, we expect to see TfSE's wider rail freight ambitions (in the TfSE Freight Strategy) taken on board and at least the following rail freight interventions included:

- Improvements in gauge clearances between the Channel Ports and South and West London and on non-HS1 routes serving the Channel Tunnel
- Access for freight trains to the expanding Southampton Port near Fawley, along with expansion of existing rail freight facilities there
- Continued improvements for rail freight movements between Southampton and the Midlands
- Improved facilities at the Port of Newhaven to support rail access
- Decarbonisation of freight traction
- Investment in Freight Consolidation Centres with access to the rail network
- Partnering on potential pilot rail freight innovations (such as express parcels delivery, alternative fuels).

Customer satisfaction

3.17 Customer satisfaction, as measured by the most recent pre-pandemic National Rail Passenger Survey, is lower for two of the three largest operators in South East England when compared to the benchmarked score for similar operators (the "London and South East" group of operators). The key indicators where South East operators perform below the national average are listed in Table 3 and Table 4 below. Great Western Railway and Cross Country are not shown as most of the responses to surveys on their performance will have come from passengers outside the South East.

Table 3: NRPS Results for largest South East franchised operators[11]

Measure	South Western	Southern	Southeastern	Benchmark
Overall journey satisfaction	75	79	83	82
Overall station satisfaction	75	80	81	80
Overall train satisfaction	73	75	80	78

Table 4: Poorly performing NRPS indicators

Operator	Indicator	Performance	Benchmark
South Western Railway	Provision of information	79	84
	Upkeep and repair of train	65	75
	Station cleanliness	70	76
	Toilet facilities at stations	44	50
	Helpfulness of staff at stations	73	78

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[11] Transport Focus (2020) "National Rail Passenger Survey Spring 2020" **https://www.transpo64rtfocus.org.uk/publication/national-rail-passenger-survey-nrps-spring-2020-main-report/**, accessed December 2021

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Operator	Indicator	Performance	Benchmark
	Station environment	68	75
	Availability of staff at stations	67	70
	Shelter facilities at stations	68	71
	Availability of seating at stations	40	53
	Availability of wi-fi at stations	30	37
	Train punctuality/reliability	64	74
	Journey time	76	82
	Connections with other services	74	77
	Value for money	37	44
	Upkeep and repair of train	71	75
	Provision of information on train	72	76
	Toilet facilities on train	29	44
	Gap between train and platform	55	64
	Train cleanliness (inside)	71	76
	Train cleanliness (outside)	68	72
	Dealing with delays	33	37
	Information about delays	37	44
	Internet connection	27	35
	Upkeep and repair of station	69	72
	Cleanliness	73	76
	Bike parking facilities	56	60
	Value for money	42	45
	Upkeep and repair of train	64	75
	Space for luggage	47	58
Southern	Toilet facilities on train	38	44
	Comfort of seats	60	64
	Gap between train/platform	58	64
	Personal security	70	74
	Train cleanliness (inside)	64	76
	Train cleanliness (outside)	64	72
	Availability of power sockets	25	38
	Ticket buying facilities	73	79
	Bike parking facilities	53	60
Southeastern	Personal security at station	69	72
	Value for money	39	45

Operator	Indicator	Performance	Benchmark
	Personal security on train	71	74
	Train cleanliness (outside)	67	72
	Availability of power sockets	25	38

3.18   TfSE is supportive of any measures that improve customer satisfaction, particularly for those indicators listed above.

3.19   Beyond the measures typically included in the NRPS, TfSE would also support measures to:

- improve the accessibility of the rail network and passenger rail services;
- reduce the complexity and perceived poor value for money of rail tickets – a common Pay As You Go zoning for the South East is being developed and is supported by TfSE
- Improving the resilience of the rail network and how it operates, including in the face of climate change. This is especially important to business (whether in terms of passenger or freight use), where certainty is valued more than speed. GBR must realistically consider the intensiveness of use that rail infrastructure is expected to support; and
- enhance integration within between rail and other modes of transport – there are many examples in the South East of poor integration between rail services and infrastructure that TfSE would like to see addressed.

Integration

3.20   Public transport information and ticketing arrangements are not sufficiently coordinated nor adequately integrated, particularly across transport modes. Parts of the South East are included in the London Travelcard area and are included in Transport for London's contactless travel arrangements. However, outside the London area more generally, there are few examples of:

- Integrated journey planning tools;
- Integrated, multi modal fares (noting some areas have access to PlusBus);
- Zonal fares systems (e.g., centred on Solent and/or the Sussex Coast conurbations); and
- Integrated, multi modal payment systems.

3.21   All this makes it harder to plan, pay for, and complete multi modal journeys in the South East. None of the conurbations in the South East are currently served by dedicated multimodal planning apps although this is a fast-developing area of interest, and third parties may provide solutions soon.

3.22   Additionally, there are several examples of poor physical integration in transport hubs. For example, Canterbury is served by two rail stations and a bus station, which are all located over half a mile apart from each other in and around the City Centre.

3.23   The railway must take account of the aims, policies, and strategies of the region's local transport authorities, particularly looking at Bus Service Improvement Plans (BSIPs) and Local Cycling and Walking Infrastructure Plans, so as to integrate railway activity as much as possible with them – for mutual benefit.

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Question 3 – Financial Sustainability

> **Question 3**
>
> *Where are the most significant opportunities and barriers to delivering financial sustainability in the rail sector over 5, 10, and 30 years and how do we achieve/overcome them? How can we most effectively monitor and assess this? What is a stretching yet realistic ambition for this objective and what measures can we most effectively use to consider success over the coming 5, 10 and 30 years? What are the interventions over that period which will be the maximum value for money?*

Context

3.24 We approach this question by first defining our understanding of what is meant by "financial sustainability". The WISP objectives suggest there are three key elements:

- increasing income/revenue;
- reducing cost/subsidy to government/taxpayers; and
- achieving high levels of efficiency.

3.25 Before addressing each of these themes, it is helpful to consider the financial position of the GB rail industry pre-pandemic (2019/20). This is outlined in Table 5 below.

Table 5: Pre-pandemic GB rail industry finances (2019/20)

Income (£bn)		Expenditure	
Passenger Revenue:	11.6	Franchised Operators	10.6
		• Staff	3.6
		• Diesel fuel	0.2
		• Rolling stock	2.9
		• Network Rail charges	2.8
		• Other costs (less industry costs)	1.1
Government Support	6.5	Network Rail	8.4
		• Operating costs	2.1
		• Maintenance	1.7
		• Renewals	2.9
		• Financing costs	2.1
		• Other costs (less industry costs)	(0.4)
Other Income	2.0	Other Costs	1.1
Total	**20.1**	**Total Costs**	**20.2**

Source: ORR[12]

3.26 This shows that, in 2019/20, the total cost of the GB rail industry was £20.2bn. In the same financial year, the Government provided a contribution of £6.5bn, representing a cost recovery of 68%. As we will explain in the following section, this is one of the highest – if not the highest – levels of cost recovery in Europe[13]. This suggests the financial position of the GB rail industry prior to the pandemic was relatively strong compared to comparator railways.

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[12] Office of Rail and Road (2020) "Rail Industry Finance (UK)", **https://dataportal.orr.gov.uk/media/1889/rail-industry-finance-uk-statistical-release-2019-20.pdf**, accessed December 2021

[13] European Commission (2021) "Rail Market Monitoring", **https://transport.ec.europa.eu/transport-modes/rail/market/rail-market-monitoring-rmms_en**, accessed January 2022 – Figure 35 in the spreadsheet titled "2021-7th-rmms-report-package-data-

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Benchmarking

3.27   In 2015 the European Commission published a report on the "Cost and Contribution of the Rail Sector"[14], which included a benchmarking exercise of all EU member state rail networks. While much of the data informing this study is now quite old, it does provide helpful insights about the relative performance of the UK[15] rail network compared to its peers.

3.28   This report shows that, at the time this study was undertaken:

- the UK rail network's operating costs were just below the average for the EU on a train km basis;
- the UK rail network had the third highest revenue yield in the EU on a passenger km basis; and
- freight utilisation was significantly below the EU average (and, as the report later argues, the UK's potential).

Financial sustainability

3.29   We recognise the rail industry is facing significant financial pressures. These are partly driven by the pandemic, but also reflect longer term pre-pandemic trends and pressures, such as a decline in 5-day working/commuting and competition from new mobility entrants (such as ride sharing businesses).

3.30   As the rail industry has high fixed and relatively low marginal costs, we believe growing rail's patronage and market/modal share is the best way of strengthening the industry's financial sustainability – at least in the short term.

3.31   In contrast, we do not believe implementing significant cuts in rail services will enable the industry to stabilise its finances, as doing so will merely drive people away from the railway, resulting in lower revenues. That said, we consider there may be scope for rationalising timetables on busier corridors (e.g., Brighton Main Line).

3.32   We are also mindful that the rail industry appears to be shifting from a customer that previously had low elasticity (i.e., London commuters with little alternative other than train to reach Central London) to those with higher elasticity (e.g., leisure travellers, or anybody who might substitute a rail journey with a digital experience). The rail industry therefore needs to become significantly more focussed on customers and their needs so that revenue levels can be stabilised and grown.

3.33   We believe there are opportunities South East's rail network where modest investment could unlock material cost savings. For example, by electrifying the remaining (unelectrified) parts of the South East Route's network, services that are currently operated by a small diesel fleet based in Selhurst could be replaced by electric rolling stock based in Brighton (and efficiently interworked with the rest of the Southern fleet). The same principle applies for the non-electrified sections of the North Downs line and for Reading-Basingstoke.

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and-figures.xlsx, which is accessible from this page, shows the level of cost recovery by public service contract and commercial fares for each EU member state, as well as Norway and the UK

[14] European Commission (2015) "Study on the Cost and Contribution of the Rail Sector" **https://transport.ec.europa.eu/system/files/2016-09/2015-09-study-on-the-cost-and-contribution-of-the-rail-sector.pdf** accessed December 2021

[15] This study includes data from Northern Ireland as well as Great Britain.

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Income

3.34   Clearly, the pandemic has materially challenged the rail industry's finances. At the time of writing, revenues had not yet recovered to 70% of pre-pandemic levels, while costs have not reduced in line with revenues.

3.35   TfSE therefore believes the fastest route to recovery must be through **attracting back old customers and generating new customers**. TfSE's Strategic Investment Plan will include several packages of interventions that are designed to attract many more people to rail (in Kent alone, demand would grow by 20% compared to business as usual) – but these are longer term interventions. In the short term, interventions[16] that might help stimulate demand could include:

- Greater use of yield management to stimulate off peak demand;
- More flexible season tickets that are aligned to hybrid working patterns (more working from home, less commuting);
- Marketing campaigns targeting the leisure sector; and
- Marketing campaigns highlighting the environmental credentials of the railway (especially low carbon).

3.36   Another route to growing revenue might be to **increase fares in real terms** – particularly on journeys that have been demonstrated as "inelastic" i.e., less price sensitive. However, **TfSE does not support a material increase in regulated fares**. This risks deterring people from using the railway and incentivising them to use alternative modes of transport, which are more likely to be car and air than walk or cycle. There is also a fundamental question of equity and fairness and a desire, on our part, at least, to ensure the railway is accessible to all.

3.37   There may also be opportunities for increasing income from **other sources**. For capital projects, this could include some form of developer contribution and/or land value capture. For operational costs, this could include other revenue generating activities at stations and on board rail services (other bundling opportunities with other pre and post journey stages may also be lucrative). TfSE is supportive of developing well connected rail stations as **strategic mobility hubs**, which would bring other services (transport and other economic functions) closer to the railway and may offer routes for additional income (e.g. retail, parking, freight).

Costs

3.38   The cost figures presented above are for the whole of Great Britain, which includes remote parts of the country where the economics of rail are fundamentally different to the South East. It is challenging (and probably unhelpful) to segregate costs between elements of the passenger rail network that serve the TfSE area and elements that serve the rest of Great Britain (particularly as many services in the South East also serve London). That said, ORR analysis suggests (pre pandemic) London and South East operators required less government support than regional operators, but more than long distance high speed operators. There appears to be a general trend whereby high density, long distance services are more likely to be "financially sustainable" than sparser and/or shorter distance journeys.

3.39   Given the current cost structure of the GB rail industry, TfSE considers that there is relatively limited scope to reduce the operating costs of the railway, at least in the short term. However,

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[16] TfSE acknowledges many of these interventions are being delivered (or have been delivered recently).

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looking at the highest cost elements, one could consider the following options for generating some savings (or at least controlling costs) in the medium to longer term:

- **Staff** – increased automation and new ways of delivering customer service and a more visible staff presence could provide ways of controlling costs, protecting, and enhancing rail revenues, and delivering better service (automation is likely to be easier to deliver through signalling, control, engineering etc rather than front line roles)
- **Diesel fuel** – all diesel operations should be eliminated and replaced with (cheaper) electricity traction
- **Rolling stock** – this could be more standardised and modularised to enable more flexible deployment, easier driver training, simpler parts/maintenance regimes etc.
- **Network Rail Costs** – this is largely driven by Operations, Maintenance, and Renewals, which is a complex area of engineering and not one TfSE is well placed to comment on in any detail. There is a growing importance for those engineering activities to become more decarbonised. Attention should be given to using parts of the GBR/Network Rail estate for generation (and distribution) of clean energy for the railway (e.g., installation of photovoltaic panels at stations to provide clean, renewable power, to reduce reliance on potentially more expensive power from the grid).
- **Complexity of rail sector interfaces –** the new industry structure should reduce the number of cross-company interfaces around the rail sector. GBR will bring in-house a range of railway functions; the end of franchising will allow GBR to provide more of a common approach across different parts of the railway, including possible reductions in service operating costs by taking on the revenue risk from the new Passenger Service Contracts.
- **Other costs** – the new GBR model should enable the pooling of several functions that are replicated at a small scale across the industry (e.g., customer contact centres, websites, compensation processes, lost property offices, booking systems). Also, many stakeholders in the South East would like to see the access charge for HS1 services significantly reduced when the current concession ends.

Efficiency

3.40   To discuss how the GB rail industry might improve its efficiency, it is helpful first to define what "efficiency" means for the operational railway. We suggest there are two primary metrics, which describe the deployment of assets, that might help shape this discussion:

- track utilisation – how many services use a section of the railway with a given capacity; and
- train utilisation – how many passengers use a given train (essentially seat occupancy), taking account of total seats available.

3.41   According to the European Commission benchmarking study cited above, at the time that study was undertaken, the UK had:

- the 2nd highest level of track utilisation (which, incidentally, contributed to weaker operating performance – sweating infrastructure assets having a negative impact on service resilience and timetable recovery); and
- slightly better than average train utilisation.

3.42   Figure 6 shows how the UK performed in this study compared to its European peers.

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Figure 6: Track utilisation and train utilisation in European countries (2015 study) – UK circled in red
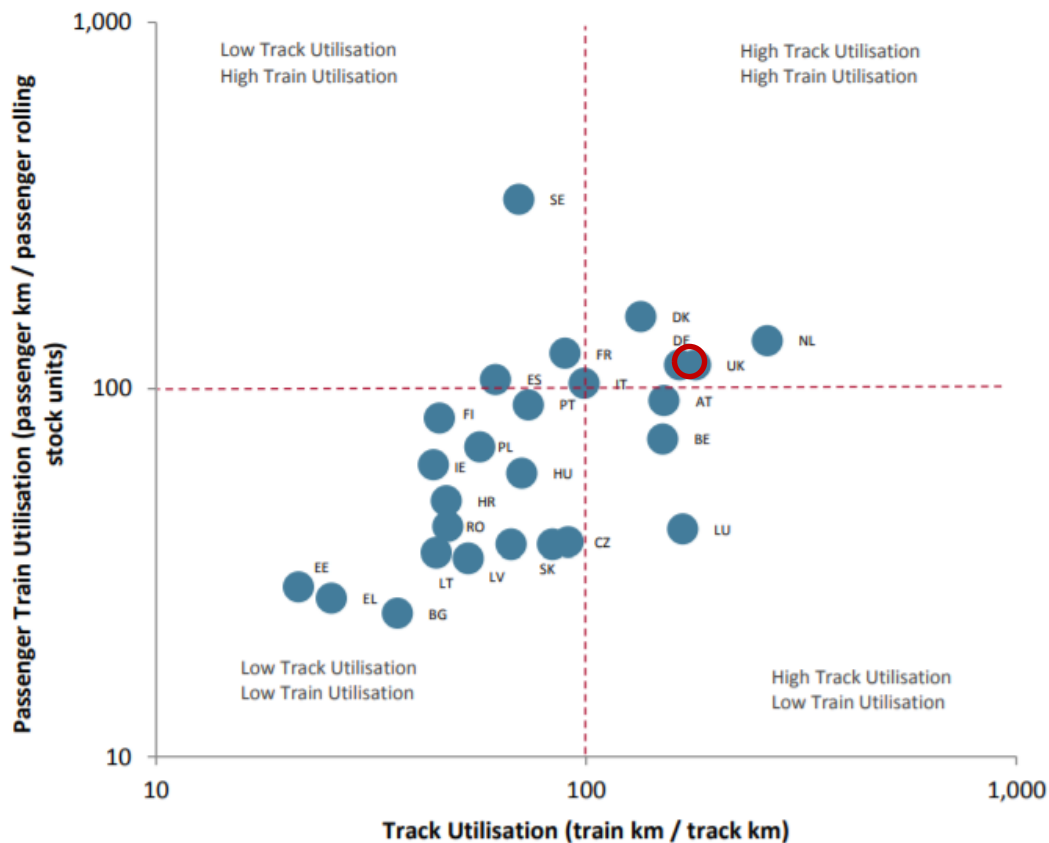
3.43   In summary, the UK is using its track assets efficiently, but there may be scope for deploying its rolling stock more efficiently. We suspect this trend is even more pronounced in the South East due to the "peakiness" of pre-Pandemic passenger demand, the weak counterflow observed in this area, and the much smaller longer distance market (and therefore much less revenue yield).

3.44   It is not clear how the South East can better utilise its rolling stock without reducing service levels. This is increasingly challenging as new trains tend to be walk-through integrated units that cannot be split or joined in service. However, there may be a case for considering:

- **Greater use of yield management** in fares to smooth demand throughout the day, whilst not making the rail fares regime more complicated.
- **Rationalising services on the Brighton Main Line** by (for example) merging the Gatwick Express service and conventional services.
- **Optimising the balance between direct or trunk-and-feeder operation around the customer –** some parts of the network will operate more efficiently on a trunk-and-feeder basis (as on the GW Main Line). On other corridors, it may be more feasible/desirable to provide new links (particularly linking places outside central London) if line capacity can become available through careful service pattern review and rationalisation.
- **Electrifying remaining "islands" of diesel operation** and replacing the diesel fleet with a more standardised electric rolling stock platform.
- **Focussing "expensive" rolling stock on high speed, high density flows** by, say, limiting the extent to which the Cl.395 fleet works off the HS1 network.

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- **Increasing the speed of services** by, say, reviewing Section Running Times on parts of the network that serve high density flows. Reducing journey times can reduce fleet size, staff costs, and a host of other cost drivers.
- **Reducing dwell times**, particularly on "stopping" services, by adopted rolling stock fleets with wider doors – a key need for the replacement for the Kent Networker fleet.

Targets and Initiatives

3.45 TfSE wishes to see revenues recover but acknowledges it will be challenging to reach pre pandemic levels in the shorter term. The long-standing trend of decline in 5-day commuting suggests the South East's railways will need to find new customers (and journey purposes) to replace those who no longer commute full-time.

3.46 In the longer term, TfSE sees significant opportunity for revenue growth through modal shift and stimulating demand through investment. Our Strategic Investment Plan is likely to include the following packages of interventions, which are designed to attract more people to rail:

- **A turn up and go metro service** in the Solent conurbation, supported by two world class mass transit systems.
- **Significantly enhanced east-west rail services** (e.g., Ashford – Gatwick, Brighton – Southampton – Exeter, Southampton – Reading – Heathrow/Old Oak Common, Brighton/Portsmouth – Reading – North of England).
- **Faster London/radial rail services for coastal/less prosperous areas,** particularly those in North Kent, East Kent, and East Sussex.
- **Better Strategic Mobility Hubs**, particularly at major rail junctions and at other multimodal interchanges.
- **Reinstated railways** in East Sussex and the Isle of Wight, (as part of the Restoring Your Railway programme) enabling direct journeys such as Brighton – Uckfield – Tunbridge Wells by rail.
- **Extended railways to support housing growth**, including new passenger services on freight-only branch lines at Fawley and the Hoo Peninsula, and new stations (in various locations).
- **Better access to international gateways** including Heathrow, Gatwick, Ebbsfleet international, and the expanding Port of Southampton (for freight, but also to serve future growth in the cruise liner market).

3.47 Modelling undertaken for the development of the Transport Strategy suggests there could be scope to double rail patronage on some routes in the South East, although this will require investment in capacity to achieve.

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Question 4 – Economic Growth

> ***Question 4***
>
> *As Britain recovers from the effects of the COVID-19 pandemic, what evidence do you have for how rail can contribute to wider economic growth over the next 5, 10, and 30 years? What is a stretching yet realistic ambition for this objective and what measures can we most effectively use to consider success over the coming 5, 10 and 30 years? What type of interventions over that period will provide maximum value for money from rail's economic contribution, and what evidence can you share to support your views?*
>
> *In the context of enabling development and regeneration opportunities both in the immediate vicinity of stations and within the surrounding area, how can rail best facilitate improvements to places and local growth, through improved connectivity and unlocking commercial activity, housing, and employment over the next 5, 10 and 30 years?*
>
> *What innovative and modernising ideas do you have which would benefit the railway while supporting the strategic objectives? Please give evidence and make reference to how they would maintain or enhance the railway's safety record.*

Economic growth

3.48   Along with the rest of the country, the COVID-19 pandemic has hit the South East hard. Crawley in West Sussex had the highest portion its workforce on furlough in the country at the height of the first wave of the pandemic (see Figure 7 below). The aviation sector has been particularly affected and will likely take many years to recover to pre-pandemic strength. TfSE is therefore supportive of interventions that target areas that have been hardest hit by the pandemic (hence our support for a Package of Interventions on the Brighton Main Line).

Figure 7: Percentage of workforce on furlough at peak of first wave of the COVID-19 pandemic (2020)
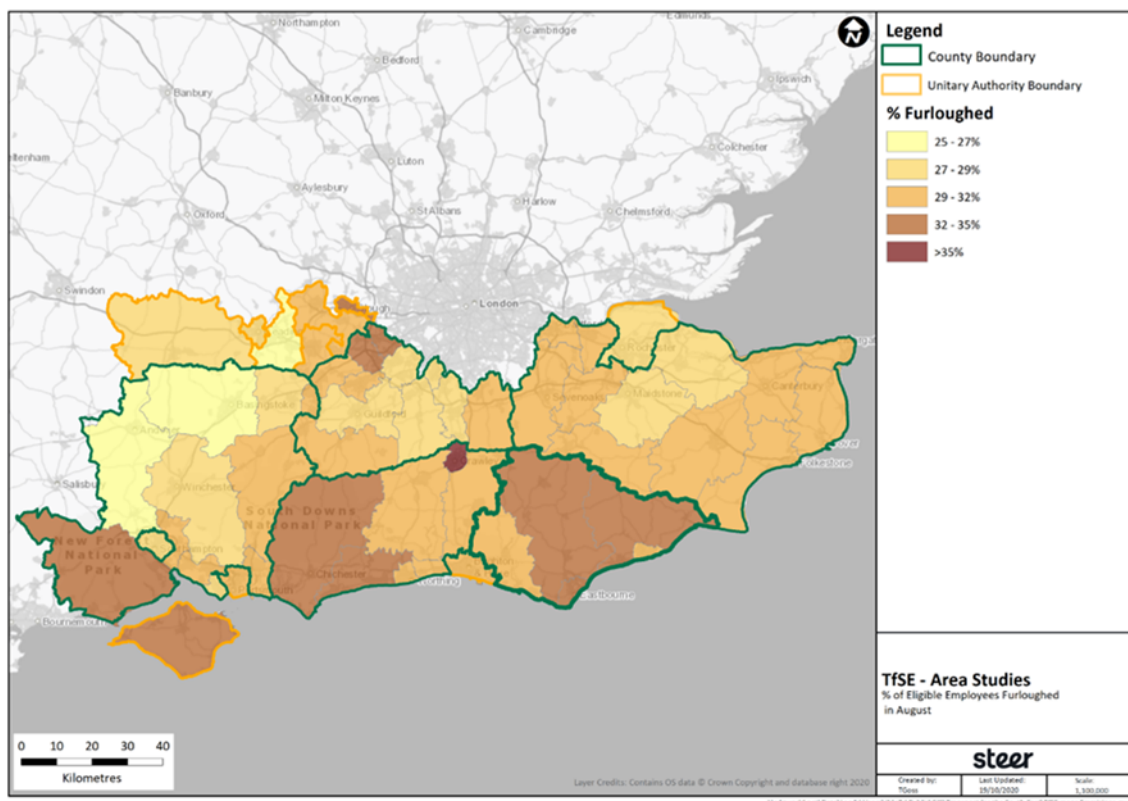
3.49 TfSE's Strategic Investment Plan will include several packages of rail based interventions, that will help boost the South East's economy. We have undertaken detailed modelling of these packages in our Land Use Transport Interaction Model. Together, the railway interventions that we have modelled have the potential to boost the South East's economy (measured as Gross Value Added) by over £1bn per annum (by 2050). Our modelling work is still ongoing, but we would be delighted to share our results with GBRTT when this work is complete.

3.50 TfSE has modelled the impacts of our proposed packages of interventions on the South East's economy using a Land Use Transport Interaction Model. The early results of this modelling indicate that targeted investments in the rail network have the potential to unlock over £1bn in Gross Value Added (per annum) to the wider South East's economy.

3.51 TfSE is particularly interested in the opportunities to improve connectivity on the South East's "orbital" and "coastal" rail services, which have received significantly less investment than London services in recent years.

3.52 We are also supportive of investment that enhances access to the South East's key ports (including Channel Ports and Southampton) and airports (including Heathrow and Gatwick). We see significant opportunity for high rail freight mode share between the South East's ports and the rest of the UK.

Enabling development

3.53 We believe there are opportunities to develop the railway network in a way that unlocks new development (both for housing and jobs) regeneration opportunities. The initiatives and listed in paragraph 3.46 above would all be important opportunities to support new development. GBR will need to be agile in its ability to respond to opportunities that may arise from new development proposals and from proposals for new spatial allocations in local planning authorities' development plans. Some enabling transport infrastructure may be required to release areas of land for development and GBR need to be alive to those cases too.

Innovation, modernisation, and safety

3.54 TfSE is supportive of the Rail Technical Strategy and the long term ambitions of the Digital Rail Programme to deliver innovative schemes that improve the performance and efficiency of the railway. In particular, we support innovations in traction that work towards the decarbonisation of the rail industry – notably for freight, which is not well suited to the largely third rail traction provided in the TfSE area. Local partners in our area are actively developing hydrogen solutions for bus and road freight – including a hydrogen hub for Newhaven, which will serve Brighton buses. Opportunities such as this could be coordinated with the railway to provide lower carbon rail solutions too.

3.55 TfSE would like to see innovative tools rolled out that have been delivered outside our area. This includes widespread contactless and Pay As You Go payment systems, as well as state-of-the-art communications and information systems that help rail users, but also provide integration with local bus networks, provision of bike/e-bike hire and other elements of joined-up MaaS (or similar) products. We support efforts to make operational and timetable data widely available for third parties to enable developers to create new services and products that benefit rail passengers.

3.56 TfSE is interested in exploring innovative approaches to the procurement and delivery of interventions in the South East, including scope for using land value capture to reduce reliance on Central Government funding.

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3.57   With respect to safety – TfSE strongly supports the removal of level crossings that intersect busy roads. For example, the Strategic Road Network between Hastings and Ashford has two level crossings. There are also crossings in busy town centres at Reigate, Totton, Cosham, and West Worthing.

Targets

3.58   The TfSE Transport Strategy for the South East identifies 5 Objectives and 11 Key Performance Indicators (KPIs) that support the WISP Economic objectives. These are shown in Table 6.

Table 6: TfSE Transport Strategy for the South East Economic Objectives and KPIs

TfSE Priority	Key Performance Indicator
• Better connectivity between our major economic hubs, international gateways (ports, airports, and rail terminals) and their markets.	• The delivery of improved road and railway links on corridors in need of investment. • Improved public transport access to Heathrow and Gatwick Airports. • Improved long-distance rail services (measured by journey time and service frequency).
• More reliable journeys for people and goods travelling between the South East's major economic hubs and to and from international gateways.	• Improved Journey Time Reliability on the Strategic Road Network, Major Road Network, and local roads (where data is available). • Improved operating performance on the railway network, measured by Public Performance Measure (PPM) and other available passenger and freight performance measures, where available (e.g., right time delivery).
• A transport network that is more resilient to incidents, extreme weather, and the impacts of a changing climate.	• Reduced delays on the highways network due to poor weather. • Reduced number of days of severe disruption on the railway network due to poor weather. • Metrics relating to reduced delay on road network suffering from Road Traffic Collisions.
• A more integrated approach to land use and transport planning that helps our partners across the South East meet future housing, employment and regeneration needs sustainably.	• The percentage of allocated sites in Local Plans that are developed in line with Local Plans.
• A 'smart' transport network that uses digital technology to manage transport demand, encourage shared transport and make more efficient use of our roads and railways.	• Increase in the number of bus services offering 'Smart Ticketing' payment systems. Number of passengers using 'Smart Ticketing'. • Number of passengers using shared transport.

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Question 5 – Levelling Up

Question 5

What evidence can you provide for how the rail sector contributes to the four levelling up outcomes and to improving connectivity in across Great Britain, including through cross-border services? How does this change depending on the type of place where the sector operates (including in cities, towns and rural areas), and what are the most cost-effective ways at the sector's disposal to improve that further during the next 5, 10, and 30 years?

How could the rail industry, over the next 5, 10, and 30 years, become more responsive to, and more accountable to, local communities and passengers? Please give evidence and examples in your response.

What is a stretching yet realistic ambition for this objective and what measures can we most effectively use to consider success over the coming 5, 10 and 30 years? What are the interventions over that period which will be the maximum value for money, and what evidence can you share to support your views?

Levelling Up

3.59   The UK Government's "Levelling Up" advisor, Neil O'Brien MP, has stated that Levelling Up means[17]:

- Empowering local leaders & communities;
- Growing the private sector & boosting living standards, particularly where they're lower;
- Spreading opportunity & improving public services, particularly where they're lacking; and
- Restoring local pride.

3.60   For TfSE, Levelling Up is about improving socioeconomic outcomes for communities that have much lower levels of prosperity than nearby communities. TfSE believes there is a relationship between prosperity and transport connectivity, but acknowledges transport is one of many drivers of weak socioeconomic outcomes.

3.61   Figure 8 below shows the areas of the South East with the highest levels of deprivation, along with an overlay of journey times to London. While there are some deprived areas of the South East with good connectivity to London (such as Slough and North West Kent), most of the more deprived areas are poorly connected to the Capital. For many areas, this also means they are poorly connected to the rest of the country, as geography dictates that, in order to reach the rest of the UK, it is necessary to go through (or round) London.

3.62   TfSE is strongly supportive of interventions that improve rail connectivity to less prosperous areas of the South East. Our Strategic Investment Plan is expected to include interventions, such as extending HS1 services to Hastings and Bexhill as a means of promoting regeneration and growth in one of the most deprived parts of the South East.

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[17] The Business Desk (2021) "Gove leaves Government's levelling-up vision waiting on spending announcements" **https://www.thebusinessdesk.com/news/1038728-gove-leaves-governments-levelling-up-ambitions-waiting-for-spending-announcements/** accessed January 2022

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Figure 8: Deprivation and transport connectivity in South East England (2020)[18]
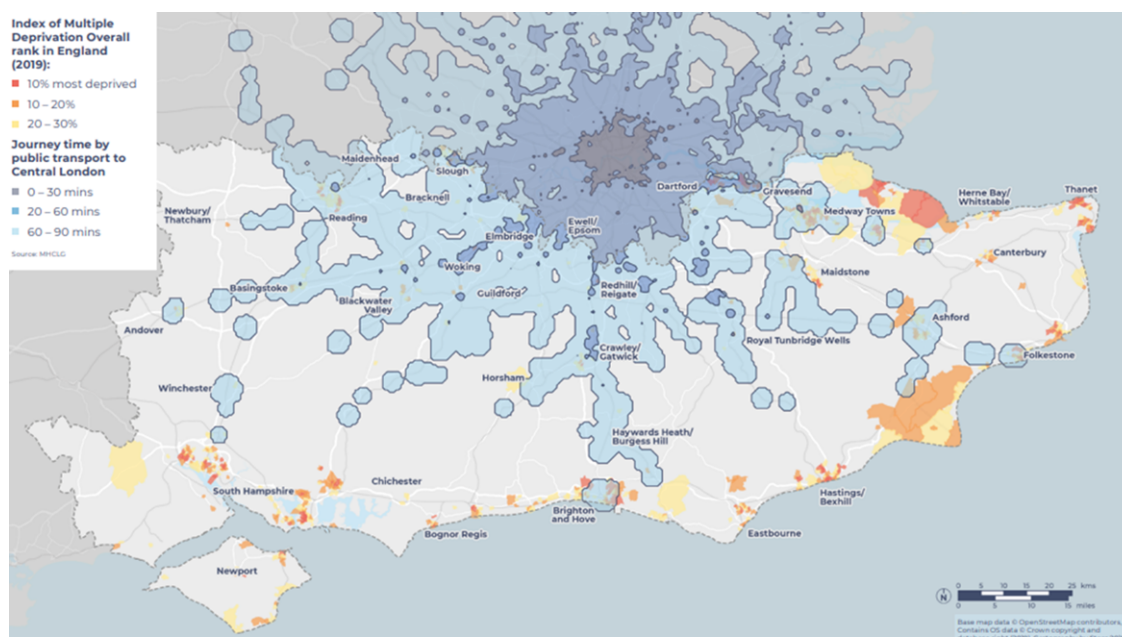
3.63　TfSE is developing a series of packages of interventions designed to boost the connectivity of the rail network in less prosperous areas. These packages, which will be set out in our Strategic Investment Plan, are likely to include:

- extending High Speed passenger rail services to East Kent and East Sussex;
- improving journey times for passenger rail services in North Kent;
- delivering a high-quality, high-frequency, urban metro service for the Solent conurbation (supported by bus and potentially tramway systems in Southampton and Portsmouth);
- reinstating closed railways on the Isle of Wight;
- improving cross country and cross regional services;
- improving connections to ports and airports;
- enhancing access, integration, and the affordability of public transport services; and
- enhancing access to employment opportunities, key services, and amenities.

3.64　TfSE has undertaken spatial analysis of the modelling of the packages of interventions outlined above. This has enabled us to understand which districts and boroughs would most benefit from an uplift in GVA arising from these packages. This work is still ongoing, but we would be delighted to share our results with GBRTT when this work is complete (encouragingly, early analysis indicates many of the interventions listed above deliver significant economic benefits for the most deprived areas of the South East.

3.65　TfSE has modelled the impacts of our proposed packages of interventions on the South East's economy using a Land Use Transport Interaction Model. The early results of this modelling indicate that targeted investments in the rail network have the potential to unlock over £1bn in Gross Value Added (per annum) to the wider South East's economy.

3.66　TfSE is particularly interested in the opportunities to improve connectivity on the South East's "orbital" and "coastal" rail services, which have received significantly less investment than

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[18] TfSE (2020) "Transport Strategy for the South East", Figure 2.6, **https://transportforthesoutheast.org.uk/app/uploads/2020/09/TfSE-transport-strategy.pdf**, accessed December 2021.

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London services in recent years. This could include providing/restoring direct services where otherwise at least one change of train would be needed.

3.67 We are also supportive of investment that enhances access to the South East's key ports (including Channel Ports and Southampton) and airports (including Heathrow and Gatwick). We see significant opportunity for high rail freight mode share between the South East's ports and the rest of the UK.

Community Engagement

3.68 Local transport in the TfSE area is currently the responsibility of five two-tier county councils and eleven single tier unitary authorities as local transport authorities (LTAs). There are no Combined Authorities in the area, and no firm plans to create any in the near future. The rail industry's engagement will therefore continue to rely on relationships with the same set of stakeholders that Network Rail and train operators engage with today – LTAs, Local Enterprise Partnerships, National Parks, Planning Authorities, Community Rail Partnerships, business organisations, civic organisations, other operators, public service providers, developers, etc.

3.69 TfSE enjoys an excellent working relationship with Network Rail and operators in the area and looks forward to working with Great British Railways as it develops over the next few years.

3.70 Network Rail is a key stakeholder for TfSE and is represented on several working groups and forums, including our Area Study Working Groups. Network Rail has helped shape priorities for our Strategic Investment Plan and worked closely with us to align objectives and understand the deliverability of the emerging packages of interventions.

3.71 TfSE welcomes any opportunity to contribute to the strategic planning process in the rail industry and continues to support Route Level and Regional Level strategy planning.

Targets

3.72 The TfSE Transport Strategy for the South East identifies 5 Objectives and 9 Key Performance Indicators (KPIs) that support broader **social** objectives, which generally align with the WISP Levelling Up Objectives. These are shown in Table 7 below.

Table 7: TfSE Transport Strategy for the South East Social Objectives and KPIs

TfSE Priority	Key Performance Indicator
• A network that promotes active travel and active lifestyles to improve our health and wellbeing.	• Increase in the length of the National Cycle Network in the South East. • Increase in the length of segregated cycleways in the South East. • Increase mode share of trips undertaken by foot and cycle. • Number of bikeshare schemes in operation in the area. • Social Mode share of walking and cycling.
• Improved air quality supported by initiatives to reduce congestion and encourage further shifts to public transport.	• Reduction in NOx, SOx and particulate pollution levels in urban areas.
• An affordable, accessible transport network for all that promotes social inclusion and reduces barriers to employment, learning, social, leisure, physical and cultural activity.	• A reduction in the indicators driving the Indices of Multiple Deprivation in the South East, particularly in the most deprived areas in the South East area.

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TfSE Priority	Key Performance Indicator
• A seamless, integrated transport network with passengers at its heart, making it simpler and easier to plan and pay for journeys and to interchange between different forms of transport	• Increase in the number of cross-modal interchanges and/or ticketing options in the South East.
• A safely planned, delivered, and operated transport network with no fatalities or serious injuries among transport users, workforce or the wider public	• Reduction in the number of people Killed and Seriously Injured by road and rail transport.

Question 6 – Environmental Sustainability

> **Question 6**
>
> *What is a stretching yet realistic ambition for this objective and what measures can we most effectively use to consider success over the coming 5, 10 and 30 years?*
>
> *What are the interventions over that period which will be the maximum value for money, and what evidence can you share to support your views?*
>
> *How can rail best invest in climate resilience, supported by smarter forecasting, planning and technology, over the next 5, 10, and 30 years and what evidence do you have to support your view?*

Interventions and resilience

3.73   TfSE's Transport Strategy for the South East sets ambitious goals for achieving environmental sustainability. The Strategic Investment Plan is expected to include several packages of interventions that aim to reduce carbon emissions, reduce the impact of transport on the historic/natural environment, and reduce the impact of transport on people. The strategy also explicitly promotes the approach of achieving biodiversity net gain in our interventions.

3.74   TfSE has used the Land Use Transport Interaction Model (SEELUM) described in paragraph 2.23 to estimate carbon emissions from transport ("at tailpipe") and test several scenarios for carbon reduction. TfSE has also used this model to test the impacts of schemes identified as part of the Area Studies. Further information about this work is provided in a published technical report[19]. This study identified three findings:

- While our modelling shows there should be a reduction in transport emissions per person in the South East by 2050 (driven by efficiencies in fuel technology and conversion to zero emission fleets), this is partially off-set by population growth.
- There is a risk that spatial planning policies may encourage a shape of employment growth (e.g., in Major Economic Hubs and regeneration areas) that hinders future employees from being able to travel by more sustainable modes. Significant developments in Major Economic Hubs should be especially planned (and sites allocated) in such a way that 'good growth' is achieved through mixed development patterns reflecting the ease of walking, cycling, and using public transport. This also risks undermining carbon reductions that could be achieved through efficiencies in fuel technology and conversion to zero emission fleets.

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[19] TfSE (2021) "Carbon Assessment Technical Report", https://transportforthesoutheast.org.uk/app/uploads/2021/03/Carbon-assessment-technical-report-final-TfSE-branded.pdf, accessed January 2022

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- Central government forecasts for the conversion of vehicle fleet appear to be very low and do not appear to align with central government policy, changing political narrative, or other industry forecasts. National Highways have provided constructive feedback to the Department for Transport and Department for the Environment, Food and Rural Affairs to this effect.

3.75 The key interventions listed in paragraph 3.46 will support the goal of achieving environmental sustainability by encouraging modal shift from car/air to rail. They also include interventions that involve decarbonising the railway and promoting better interchanges with other forms of public transport and active travel.

3.76 Some of the interventions that are being promoted by TfSE may have an adverse impact on the environment during the construction period (including carbon, through embedded emissions), and we are keen to mitigate these impacts as much as possible. We are also promoting schemes that may incur a higher upfront capital cost (such as tunnels rather than cuttings or at-grade infrastructure) to limit their impact on the natural and historic environment.

3.77 The South East's rail network is vulnerable to the impact of Climate Change. For example, the Folkestone Warren railway has historically suffered significant disruption from weather and coastal subsidence, and this risk of disruption is expected to worsen as Climate Change takes effect. The Strategic Investment Plan will include some interventions aimed at strengthening resilience. This includes developing a diversionary route between London and Brighton Main Line (delivered through reopening Uckfield – Lewes line) and providing an alternative route to the railway at Folkestone Warren (which would be achieved by building a chord between the Canterbury East and Canterbury West lines).

Delivering environmental sustainability

3.78 The high proportion of electrification of the South East's railway means it is particularly well placed to make a significant contribution to the government's decarbonisation agenda. Electrifying the unelectrified gaps will ensure the railway can reach carbon neutrality as soon as possible, while also helping reduce costs and increase the operational efficiency of the railway.

3.79 The railway also can support the decarbonisation agenda through promoting modal shift from air and car to rail. The London – Paris Eurostar service (which until recently called at Ebbsfleet and Ashford) shows the level of modal shift that can be achieved with the right level of targeted investment[20].

3.80 Additionally, modal shift can support other environmental objectives by reducing noise, air pollution, and the impact of the car on the built and natural environment. In the longer term, higher rail mode share can provide an alternative to highway capacity expansion (and many of the environmental risks associated with this type of investment).

3.81 TfSE is also alive to the increasing risk of climate change resulting in higher levels of disruption to the transport system – particularly in impacts to infrastructure. Some of the South East's key highway and rail corridors cross areas prone to flooding and subsidence (e.g., Folkestone

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[20] Eurostar's market share on the London – Paris route was reportedly 75% pre-pandemic, and the company was making inroads into the London – Amsterdam market. Source: International Rail Journey (2020) "First direct London Eurostar departs Amsterdam as Eurostar-Thalys merger progresses", **https://www.railjournal.com/passenger/high-speed/first-direct-london-eurostar-departs-amsterdam-as-eurostar-thalys-merger-progresses/** accessed December 2021.

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Warren line between Folkestone and Dover). Future investment programmes will likely need to include some resources to protect and strengthen the resilience of the most vulnerable parts of the transport network.

Targets

3.82   The TfSE Transport Strategy for the South East identifies 5 Objectives and 7 Key Performance Indicators (KPIs) that support broader **environmental** objectives, which generally align with the WISP Environmental Sustainability Objectives. These are shown in Table 8 below.

Table 8: TfSE Transport Strategy for the South East Environmental Objectives and KPIs

TfSE Priority	Key Performance Indicator
• A reduction in carbon emissions to net zero by 2050 to minimise the contribution of transport and travel to climate change.	• Reduction in carbon emissions by transport.
• A reduction in the need to travel, particularly by private car, to reduce the impact of transport on people and the environment.	• A net reduction in the number of trip kilometres undertaken per person each weekday. • A reduction in the mode share of the private car (measured by passenger kilometres).
• A transport network that protects and enhances our natural, built, and historic environments.	• No transport schemes or interventions result in net degradation in the natural capital of the South East, instead aiming for environmental net gain for priority ecosystem services (such as natural flood risk management). • No transport schemes or interventions result in a net loss of biodiversity but seek to achieve a minimum of 10% net gain in biodiversity managed for 30 years, in line with the requirements of the Environment Bill.
• Use of the principle of 'biodiversity next gain' (i.e., development that leaves biodiversity in a better state than before) in all transport initiatives Use of the principle of 'biodiversity next gain' in all transport initiatives.	• No transport schemes or interventions result in a net loss of biodiversity but seek to achieve a minimum of 10% net gain in biodiversity managed for 30 years, in line with the requirements of the Environment Bill.
• Minimisation of transport's consumption of resources and energy.	• Reduction in non-renewable energy consumed by transport.

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Scenario Forecasting Results

Business As Usual (2050) Entire TfSE Area (TfSE)

Change by key indicator

Change by movement type

1.09m — 14% — Population

420k — 13% — Employment

£217bn — 119% — GVA

3.34m — 16% — Trips

TfSE to Other **+30%**
TfSE to London **+24%**
Other to TfSE **+42%**
London to TfSE **+24%**
Within TfSE **+12%**

Change in trips by mode

- Car 20%
- Tram 28%
- Bus 32%
- Cycle -5%
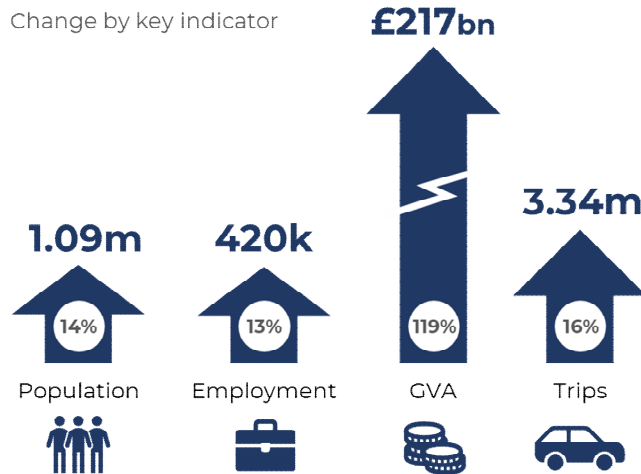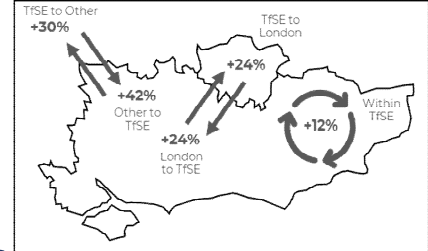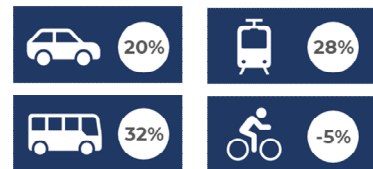
Sustainable Route to Growth Entire TfSE Area (TfSE)

Change compared to **Business as Usual (2050)**

Change by movement type

+85k — 1% — Population

+471k — 13% — Employment

+£59bn — 15% — GVA

+900k — 4% — Trips

TfSE to Other **– 14%**
London to TfSE **+47%**
Other to TfSE **+4%**
TfSE to London **+1%**
Within TfSE **+4%**
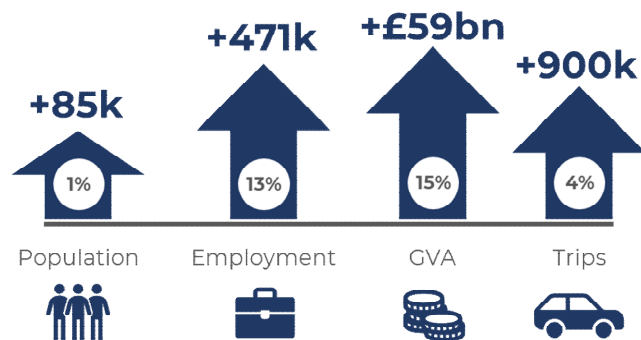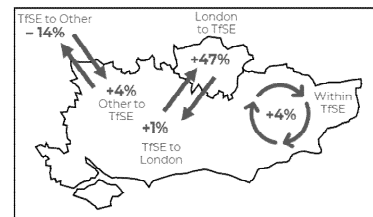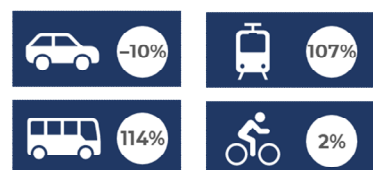
BAU 2050: 8.8m — 3.7m — £400bn — 24.2m

Change in trips by mode

- Car −10%
- Tram 107%
- Bus 114%
- Cycle 2%

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**Future of Transport regulatory review: zero emission vehicles
Joint STB response**

1.1   This is the joint submission from the Seven Sub-national Transport Bodies
       (STBs)[1] in response to the Future of Transport regulatory review
       consultation call for evidence in relation to Zero Emission Vehicles.

1.2   The role of STBs as set out in the enabling legislation[2] is to identify and
       prioritise larger scale transport investment schemes in their areas to
       facilitate sustainable economic growth. They bring a strength of
       partnership among their membership to speak to government with one
       voice. Sub-national bodies can offer significant benefits from consolidating
       and facilitating multi-agency activities, evidence and analysis on an
       integrated regional scale, and the decision-making to deliver an evidenced
       solution which is right first time. Further, the DfT Transport
       Decarbonisation Plan (2021) makes reference to "STBs can support the
       government's decarbonisation objectives by joining up local plans across a
       wider geography, to capitalise on economies of scale and ensure
       coherence across local authority borders", and the Transport Select
       Committee Inquiry into Zero Emission and Road Pricing states "the
       Government must support STBs and LAs to deliver a range of practice and
       accessible charging solutions to suit local needs, so that no area is left
       behind".

1.3   In view of the timescales for the response deadline, this response has
       been prepared by senior officials in the STBs.

1.4   This document outlines the response to the four areas for which OZEV are
       seeking views on new primary legislation for the introduction of
       government powers.

2. Our Response

2.1.1 STBs are supportive of Governments ambitions to electrify the vehicle
       fleet and agree that there is a need to review and update the regulatory
       framework in relation to ZEV's and welcome the opportunity to respond to
       this consultation.

2.1.2 STB's are uniquely placed to work with Government, local authorities
       (LAs) and the private sector in ensuring value-for-money, funding and
       strategic decisions regarding transport are informed by our local
       knowledge, expertise, and needs. Supported by government funding, we
       work collectively to develop robust evidence on the transport needs of our
       communities, identifying transport investment to support our shared

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[1] Outside London the seven STBs covering England are: Transport for the North, Midlands Connect, England's
Economic Heartland, Transport East, Western Gateway, Peninsula Transport and Transport for the South East.

[2] The Local Transport Act 2008 (as amended)

ambitions for sustainable and inclusive economic growth, decarbonisation, and identifying levelling up opportunities across all localities in the regions we represent.

2.1.3 The DfT has recently asked STBs to submit proposals to support LAs in achieving greater uptake of EVs for their areas to support the roll out of the soon to be published national Electric Vehicle Infrastructure Strategy. This can support the development of regional assessments of current and future EV infrastructure needs, which some STBs have begun to develop. The STB approach can provide a 'bottom up' evidence base (from MSOA level), providing further local intelligence around chargepoint demand, type and location of demand, to support local authorities and energy system stakeholders in planning infrastructure provision. This can then be drawn up to regional level to help mitigate the risk of inefficient and duplicate planning and delivery, but also support the scaling of opportunities and the commercial attractiveness to operators and investors. Whilst more ambitious, this is vital considering that many of the trips made across the UK are medium to long distance, or transboundary (across LAs) in their nature. STBs will have a key role in assisting LAs in the rollout of EV charging infrastructure.

2.1.4 **The following sections outline our collective STB response to the Future of Transport consultation.**

2.2 <u>Statutory obligation to plan for and deliver charging infrastructure</u>

2.2.1 The proposal outlined in the consultation document does not specify which organisation(s) the statutory obligation could be applied to but does refer to LAs, charge point operators and energy companies. The STB response to this proposal predominantly focuses on the views of STBs if the statutory obligation were to be applied to LAs to plan for charge point provision, with energy providers and charge point operators responsible for delivering the provision.

2.2.2 STBs are actively engaged with their constituent partners and have a solid understanding of the aspirations of LAs and the challenges which they face in achieving them. STBs are supportive of the stated importance of local leadership and delivery, with STBs and LAs across the country developing evidence and planning for EV charging infrastructure based on local knowledge. We believe that Government should set national policy & regulations, we look forward to the publication (Q1 2022) of the OZEV infrastructure strategy. Within this framework we believe STBs can play a pivotal role in providing a regional evidence base, facilitate collaboration / sharing of good practice, and LA's should lead on ensuring EV infrastructure is delivered in the right locations in their areas.

2.2.3 It is essential that the correct funding, delivery and enforcement mechanisms are provided in conjunction with any additional responsibility

for planning and/or delivery. Any statutory duties should be outcome focused, based on local evidence on the number and type of charging infrastructure required. This should also be informed by national guidance, for example on minimum requirements, LA's should have discretion to deliver the best outcomes for their locality – not be driven by outputs and targets. There are a number of challenges around trip-end parking in places with an absence of off-street parking; and the statutory duty, plans or funding needs to account for this and ensure these communities are not left behind. The role of private sector providers needs to be taken into account as they will continue to have a significant impact on level of provision over which LAs have no control. LA's need to be adequately funded to support EV roll out, through an evidence led funding stream which is not based on competitive bidding and should include revenue support to build capacity in regions, as well as capital for infrastructure. Additional responsibility for LAs without adequate funding and resource being provided risks an inconsistent roll out of the availability and quality of EV charging infrastructure across England. It may be helpful if a statutory body could enforce statutory duty to plan for sufficient charging points, noting that this would need to fit alongside Ofgem's statutory role.

2.2.4　The consultation document makes little / no reference to responsibilities around the maintenance of chargepoints once installed, and STBs request that any maintenance responsibility, minimum standards and associated financial costs and safeguards are clearly outlined and consulted on before the responsibility is assigned. This clarity on responsibility should also be extended to cover the sustainable management of assets, including consideration on how they can be upgraded, repaired and recycled in line with the principals of a circular economy, and also the costs and best practice of decommissioning assets. The introduction of legislation for private car park owners to provide EV infrastructure should be considered, as a means to ensuring the private sector contributes to funding the transition to electric vehicles.

2.2.5　If LAs are to be assigned greater responsibility in the planning and delivery of EV infrastructure, there is a risk that efforts and expense could be duplicated across LAs. STBs could have a coordinating role in this instance, providing a regional resource of evidence and expertise facilitating coordination between neighbouring authorities and delivering better value for money from public investment. Through the STB regional evidence base, STB's are able to support LA's in developing integrated transport investment programmes – considering all modes and cross boundary trips.

2.2.6　Reference is made within the consultation document to the expected benefits of introducing a statutory duty to plan for and ensure adequate charging infrastructure provision in a given geographical area. STBs would expect the approach of a single overall plan to provide some clarity of expectations, however this will require a clear outline of responsibilities, particularly when combining public and private sector decisions and delivery. STBs are aware there have been various instances in LAs relating

to permitted development and charge points being installed by the private sector with little engagement with the local strategic planning authority which risks the development of a sporadic and unreliable network. This issue needs to be considered within plans for the regulatory framework. The statutory requirement implies a need to develop a strategy/policy to recognise the number of charge points, barriers to delivery and locations to deliver for the individual authority, which means the approach is not piecemeal. It also means that an LA can take a balanced approach to investment, inviting private investment but retaining control. In the case of County Councils, it would enable a LA wide procurement strategy delivering better value for money.

2.2.7 With most vehicle kilometres occurring on the Strategic and Major Road Networks, the consideration of such trips in the planning and implementation of EV charging infrastructure is key. STBs have tools available, or are in the process of developing tools, which could greatly assist in identifying current and future EV charging demand, locations for charge points and its impact on the electricity network. STBs offer a regional perspective and can deliver a robust and consistent evidence base providing data on current and forecast demand for EV charging at a local scale whilst also accounting for the EV charging infrastructure needed to support longer cross-boundary trips.

2.2.8 A strategic regional plan can ensure resilience of EV infrastructure network decisions. Planning at this scale will support mass adoption of EVs across all place types that is inclusive of all users and will ultimately deliver our decarbonisation goals. A common understanding of relative costs and impacts for our different places will be critical in exploring the optimum timing and distribution of EV infrastructure delivery to meet our decarbonisation targets, through adopting a whole network approach. This also helps to communicate policy certainty and an attractive investment environment for charge point operators and investors to develop and embed sustainable and inclusive long-term commercial models. This requires a coordinated approach with Distributional Network Operators (DNOs) to ensure that:

- Electric charging infrastructure is accessible to all, regardless of household type
- Decisions on electric charging infrastructure are part of a whole system approach to improving transport networks
- This supports an integrated approach to strengthening and decarbonising electricity networks
- Ensuring that charging infrastructure roll-out supports a rapid move to zero carbon transport.

Case Study: Transport for the North Regional Steering Group (LAs, OZEV, DNOs).

TfN lead a regional EV Steering Group for LA partners, Distribution Network Operators, National Highways, Network Rail, the Energy Saving Trust and National Grid. This provides a forum for partners to shape TfN and partners EV strategies and evidence bases, discuss EV-related issues, share experiences and gather feedback from other local partners.

As part of TfN EV work, TfN have developed an Electric Vehicle Charging Infrastructure (EVCI) model. The EVCI model translates regional travel demand and land-use data (travel patterns, car population, socio-demographics, household types etc) from TfN's Analytical Framework to EV charging infrastructure requirements. This predicts a likely level of supply of EVCI required to meet a given level of demand and usage. Outputs are generated at an MSOA level, providing partners with an enhanced chargepoint demand evidence with which to draw from. It also produces a DNO focused output targeted at presenting the linked electricity demand on the grid, to help enhance our energy partners planning and delivery. There is a risk that funding allocation based solely on modelling will favour more affluent areas where there is greater wealth and car ownership, particularly given the focus on SRN sites in the consultation document. The TfN EVCI model factors in social and sustainability elements which would assist with ensuring there is a balance in the provision and contribute to Government ambitions on levelling up.

The TfN model outputs can be altered to test outputs under different Future Scenarios, and to reflect different rates of EV uptake or changes in travel and charging behaviour, such as higher levels of home working. This allows LAs to understand levels of demand for future charging infrastructure, providing agility and managing the future uncertainty of social, spatial and sustainability decisions impacting on car use and resulting EV demand. This will provide further clarity on how a variety of factors may impact the levels of EV charging infrastructure required, including assessment towards the optimum balance of charge points to support decarbonisation and inclusivity, as well as road network efficiency, quality, and resilience. Since the model is built using open data, the model outputs can be shared with TfN partners. The structure and build can also be shared with the other STBs (as part of a common Analytical Framework) and allow them to apply their own regional datasets to influence the model outputs.

2.2.9 Government should intervene with economic regulated industries – specifically telecommunications and energy generation/supply. Government already has the power to give a direction to an independent economic regulator where that can be justified on grounds of national need/policy. Government can and should act to stimulate investment in infrastructure that supports/enables change by directing the regulators in

a co-ordinated manor, to mandate that EVCPs need to adapt / work with the grid rather than the grid adapting to EV demand.

2.3 Requirements to install charge points in non-residential car parks

2.3.1 Through STB engagement with our local authority partners, STBs have a strong understanding of the barriers which LAs are facing in responding to demands for charging infrastructure. A current major barrier is delivering charging infrastructure for residents without off-street parking. There is currently little private sector investment in on-street charging and a number of issues to address, including potential for street clutter, trailing wires, and a lack of consistency in the quality and availability of on-street charging. This issue requires further guidance on standards and principles for on-street parking, whilst recognising the need for agility to varying place types. Further insight and methodology will be required as to the intended targets or requirements any legislation would set, something which was previously outlined in the 2019 Government consultation on electric vehicle charging in residential and non-residential buildings[3].

2.3.2 The requirement for charge points to be installed in non-residential car parks is encouraged as this could increase the availability of accessible charging points for those without off-street parking access, and also for charging access as part of a longer journey. However there is a risk that those using the EV chargers without off-street parking may be required to pay more per charge and the requirement therefore needs to consider the wider social impacts as it is developed further. Without this consideration, there is a very significant risk of widening the gap between poverty and affluence especially as/when policies come into force to deter use of fossil fuelled vehicles. Further, Government should provide guidance on minimum standards for EV charging infrastructure, with LA's to implement their own policies for EVCI standards / charging policies. This would support the ambition of equal charging infrastructure rollout across England.

2.3.3 The previous consultation in 2019 for new non-residential buildings to install charge points proposed that every building with more than 10 car parking spaces should have 1 charge point. The output of the 2019 consultation has not yet been published. STBs would offer the support of their EV models and evidence base to help forecast potential requirements based on varying user behavioural assumptions. This would provide agile planning and inform the minimum requirements which should be set since the evidence behind the proposed 1 charge point per 10 spaces is not fully available. As the adoption of EVs increases, more charge points will be required and plans therefore need to include provision for adding to charge points over time, noting requirements for power supply etc.

2.4 New powers to support the delivery of the Rapid Charging Fund

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[3] https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/818810/electric-vehicle-charging-in-residential-and-non-residential-buildings.pdf

2.4.1 STBs welcome the new powers to support the delivery of the Rapid Charging Fund, particularly around creating greater market competition and cost reductions. STBs also welcome the availability of funding and emphasise the need to ensure that the funding is released within the original timescales considered by DfT and for there to be no reduction in funding.

2.4.2 The evidence base and (where available) the models produced by STBs are available to support Government with identifying locations for the rollout of charging infrastructure on the Major Roads and Strategic Roads Networks as part of the Rapid Charging Fund. However we would remind the Government that a whole network and whole system approach to EV charging infrastructure should be maintained to deliver optimum and cost-effective results. This is a view that STB evidence and partnerships can provide to support our shared goals.

2.4.3 STBs can support the Government with identifying priority locations for charging points in their STB areas. STBs are well placed to lead on development of regional EV infrastructure plans, in doing so reducing resource demands on individual LA's and delivering better value for money for the public purse. This approach would support long term EV infrastructure planning based upon evidence of need and remove the need for inefficient competitive funding rounds which risk delivery of an inconsistent regional and national EV charging network. Funding allocation decisions should be aligned with local net zero policies, for example those LAs with active travel as means of carbon reduction in their plans should have less need for EV charging infrastructure than those authorities where medium or long distance travel is more of an issue and there is less scope for mode shift to mitigate this.

2.5 <u>Requirements to improve the experience for electric vehicle consumers</u>

2.5.1 STBs are supportive of proposals for more inclusively designed charge points, consumers feeling safe when charging on-route, and consumers having rights to redress if something goes wrong. The interoperability of charge points is key if a consistent rollout of charging infrastructure is to be achieved alongside the interchangeability of technology and payment systems.

2.5.2 STBs would encourage these standards to be in place for both public and private charging points, since this is required for there to be a consistent standard of charging points across the UK, ensuring compliance with the Disability Discrimination Act and the Equality Act 2010. If these standards were only applied to UK public charging points, there is a risk that those areas with predominantly private charging points would receive a below standard level of charging provision. Further, given that one of the proposed new powers is focused on inclusive design, by only applying this power to public charge points risks some areas being socially excluded.

2.5.3 For the suggested powers to be applied, there is a requirement for adequate funding to be provided to the responsible body for monitoring and enforcing charge point standards. Further, the necessary enforcement powers need to be in place for the responsible body to ensure that the new standards for charge points can be monitored and fully enforced.

2.5.4 There is a potential safety risk associated with EVs running out of charge, which is a particular safety concern for smart motorways. There needs to be a suitable recovery / mobile charging mechanism in place to mitigate against stationary out-of-charge vehicles blocking lanes, particularly since EVs cannot be towed and are very heavy to recover.

Emailed to: feedback@gatwickfutureplans.com

30 November 2021

To whom it may concern,

Gatwick Northern Runway Project Consultation

I am writing to you as lead officer for Transport for the South East (TfSE) in response to the consultation on Gatwick Airport's Northern Runway Proposals.

Transport for the South East (TfSE) is a sub-national transport body (STB) that represents sixteen local transport authorities. These are Brighton and Hove, East Sussex, Hampshire, Kent, Medway, Surrey, West Sussex, the Isle of Wight, Portsmouth and Southampton, and the six Berkshire unitary authorities.

These authorities are represented on the Partnership Board along with representatives from the region's five Local Enterprise Partnerships, District and Borough authorities, the protected landscapes in the TfSE area, National Highways, Network Rail and Transport for London. TfSE provides a single voice from across its geography on the transport interventions needed to support sustainable economic growth.

Our transport strategy was agreed by the Partnership Board in July 2020. It sets out a 2050 vision for the development of the South East transport system, which includes a commitment to reach net zero carbon emissions by 2050, at the latest. One of the key principles underpinning the vision for our strategy is to achieve sustainable economic growth that leads to positive social and environmental outcomes.

Gatwick Airport sits at the centre of the TfSE geography and is recognised as an important economic asset for the South East. It facilitates the movement of goods and services across the region and the UK, as well as supporting access to international markets. It is also a key employer in the area and generates employment through a significant local and national supply chain that supports its operations.

We understand that proposals for the project are currently at the pre-application stage of the Development Consent Order (DCO) process therefore a formal response will be submitted at the acceptance stage. At this point in the process insufficient information has been provided about the potential impacts of the expansion plans and the way in which the adverse impacts that have been identified to date would be appropriately mitigated. As a consequence, TfSE is not in a position to either support or oppose Gatwick Airport's Northern Runway Proposals at this time. There are a number of aspects of the proposals which require further consideration. This will enable the proposals to be reviewed and refined before they are formally submitted to the Planning Inspectorate.

Carbon emissions and climate change

Transport is currently the single biggest contributor to Green House Gas emissions. Action needs to be undertaken to address this and our transport strategy includes a commitment to meet the Government's target of achieving net zero carbon emissions by 2050, at the latest.

It is noted that the Preliminary Environmental Impact Report suggests that there will be an increase in overall carbon emissions of 1.387 MtCO2e at the 2038 assessment year as a consequence of the expansion plans. The Government's recently published Transport Decarbonisation Plan (TDP), and the Jet Zero consultation, sets the government's commitments and the actions needed to decarbonise the entire transport system in the UK. It is clear that to deliver the commitments set out in the TDP, bold actions will be necessary. The non-technical summary report on the Preliminary Environmental Assessment states that a Carbon and Climate Change Action Plan is being drafted that will set out how the impact on Greenhouse Gas Emissions are to be mitigated. This report will be published with the application for development consent. Until this report is available, it will not be possible to determine the extent to which the expansion plans will contribute to the Government's mandated target of achieving net zero carbon emissions by 2050.

Noise

Communities that live under the flight paths of the Airport are already affected by aircraft noise. The potential increase in the number of flights resulting from future expansion would mean more noise disturbance. The proposed introduction of a new and improved Noise Insulation Scheme, a Homeowners Assisted Moving Scheme and a proposed 'noise envelope' to set limits and manage noise from future operations at Gatwick are noted. Further information will need to be provided as the proposals develop to identify whether the

proposed mitigation measures will be sufficient to address the impact on quality of life of those communities that will have increased external noise levels as a result of the expansion plans.

Transport and surface access

The proposed expansion of Gatwick Airport will have significant impacts on the transport system in and around the surrounding areas of Gatwick Airport and these impacts will need to be satisfactorily addressed. TfSE expects Gatwick Airport to provide further information and clarification on how the additional demand resulting from the possible expansion of the airport will be accommodated.

Gatwick Airport Limited should be promoting sustainable travel modes as the preferred method of transport to and from the airport for passengers and staff. However, the main measures to mitigate the likely surface transport impacts set out in the consultation material are local highway improvements and a plan to provide an additional 18,500 car parking spaces. The need for this quantity of additional car parking spaces is unclear and further clarification about this is required. The current objectives for increasing both passenger travel (60% of passengers using sustainable transport by 2030, from 48% in 2020); and more importantly staff travel (60% of staff journeys to work using sustainable transport by 2030, from 39% in the 2016) to the airport by sustainable forms of transport are not ambitious enough and more will need to be done to promote the use of these modes of transport by both passengers and staff.

Employment and economy

The projected increase of 18,400 additional job opportunities by 2038 is to be welcomed. It is noted that over 50% of these jobs would be in the higher and semi-skilled categories such as pilots, air traffic controllers and flight operations staff, customs, immigration, police, fire staff, and information technology roles. We note that an Employment, Skills and Business Strategy Implementation Plan is currently being drafted and would wish to review this when this is published to identify how the employment opportunities arising from potential airport expansion could be maximised. In particular it will be important to identify what can be done to make the 50% lower skilled sustainable in the longer term through career progression opportunities.

Conclusion

In conclusion, at this point in the process TfSE's position is that it neither supports nor opposes the proposals to bring the northern runway into regular routine use. As has been highlighted in this response, there are a number of aspects of the proposals where further information is required to enable the

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potential impacts of the proposals to be more fully assessed. In addition, clear and robust strategies need to be developed to deal with the potential impacts of the proposed expansion plans on carbon emission and noise and ensure that a greater proportion of those travelling to the airport as passengers or employees can do so using sustainable forms of transport. It is vital that all of the documentation and supporting information relating to the proposals is made available to enable thorough scrutiny as the proposals progress through the DCO process. In the meantime, the Airport will continue to be an important consideration for TfSE as we continue to develop our Transport Strategy. We will welcome continued engagement with Gatwick Airport Limited as your expansion proposals are developed further and appreciate there will be further opportunities to respond during the DCO process.

This is an officer response. The TfSE Partnership Board meets on 24 January 2022 and will consider this draft response and a further iteration of it may therefore follow.

Yours sincerely,

Rupert Clubb
Lead Officer
Transport for the South East

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Emailed to: transporteastconsultation@jacobs.com

10 January 2022

To whom it may concern,

Transport East's Draft Transport Strategy Consultation

I am writing to you in my role as Chair of Transport for the South East (TfSE) in response to the consultation on Transport East's draft transport strategy. A copy of this response was considered and approved at our Board meeting on 24 January 2022.

Transport for the South East (TfSE) is a sub-national transport body (STB) that represents sixteen local transport authorities. These are Brighton and Hove, East Sussex, Hampshire, Kent, Medway, Surrey, West Sussex, the Isle of Wight, Portsmouth and Southampton, and the six Berkshire unitary authorities. These authorities are represented on the Partnership Board along with representatives from the region's five Local Enterprise Partnerships, District and Borough authorities, the protected landscapes in the TfSE area, National Highways, Network Rail and Transport for London. TfSE provides a single voice from across its geography on the transport interventions needed to support sustainable economic growth.

TfSE welcomes the opportunity to comment on Transport East's draft Transport Strategy. You have developed a bold and ambitious vision that includes the aspiration to deliver a resilient and reliable transport network for the area that will deliver inclusive and sustainable growth. Your vision strongly aligns with the 2050 vision set out in our own transport strategy, as do the strategic priorities and goals you have set to deliver it. TfSE also fully supports the approach to delivery that you are promoting with its focus on planning for people and places rather than vehicles. The similarities in the vision, strategic goals and approach in both of our strategies reinforces the need for us to continue to work together closely as we move to implement the strategies and reach our shared vision to achieve sustainable economic growth.

Transport for the South East supports the commitment in your transport strategy to meet the ambitious and challenging target of decarbonising the transport network and achieving net-zero emissions by 2040. It is clear that you

recognise of the scale of this challenge and the step change to future planning for transport that will be required to achieve this.

Your draft strategy also highlights the importance and challenges of encouraging people to change their behaviours and use sustainable modes of transport instead of private motor vehicles. TfSE also fully supports the strategy's focus on creating a transport network that encourages people to use public, shared and active transport modes that can provide zero carbon solutions and alternatives to the private car.

The focus of your strategic priority on unlocking the constraints on international gateways is one that we share. To deliver on this we are currently finalising work on a freight, logistics and gateways strategy for our region. This strategy provides a route map to enable the growth of the industry to keep up with the growing population and economy in a sustainable manner. We strongly support your stance on the need to decarbonise the freight sector by encouraging an increase in the use of alternative fuels, but also a mode shift of freight movements to a more sustainable modes of transport. It is only through joint working that we will begin to identify solutions and we look forward to working closely with Transport East on identifying and resolving these challenges.

Improving connectivity in rural and coastal communities is another key priority identified in your strategy. Action is needed to level up these areas through better connections, enabling deprived areas to prosper. The focus on reducing the need to regularly travel long distances by encouraging a switch to more localised trips, through closer services or via digital means is clearly the way forward and we look forward to learning more about your plans for improving digital connectivity. TfSE also strongly supports the focus on promoting active travel modes in rural areas and we look forward to hearing more about your approach to improving strategic walking and cycling routes.

In conclusion, TfSE welcomes the Transport East draft Transport Strategy as there are many aspects of it that are closely aligned with our own transport strategy. Moving forward we keen to continue working closely with you to ensure a coordinated approach to the development of our strategic transport investment plans in our areas, and we wish you well with the next stages of the development of your strategy.

Yours sincerely,

Cllr Keith Glazier

Chair

Transport for the South East

8 October 2021

Dear Sirs,

Transport for the South East (TfSE) response to West Sussex Transport Plan 2022-2036 consultation

I am writing to you as lead officer for Transport for the South East (TfSE) in response to the consultation on your West Sussex Transport Plan 2022-2036.

TfSE is a sub-national transport body which represents sixteen local transport authorities in the South East of England. These are Brighton and Hove, East Sussex, Hampshire, Kent, Medway, Surrey, West Sussex, the Isle of Wight, Portsmouth and Southampton, and the six Berkshire unitary authorities. These authorities are represented on the Partnership Board, which is its decision-making body, along with representatives from the region's five Local Enterprise Partnerships, district and borough authorities, protected landscapes, Highways England, Network Rail and Transport for London.

TfSE provides a mechanism for its constituent authorities to speak with one voice on the transport interventions needed to support sustainable economic growth across its geography. High-quality transport infrastructure is critical to making the South East more competitive, contributing to national prosperity and improving the lives of our residents.

TfSE welcomes the opportunity to comment on the West Sussex Transport Plan 2022-2036. As you will be aware TfSE published a thirty-year transport strategy for the South East in July 2020, which sets out an ambitious vision for our area in 2050. As one of our constituent authorities, West Sussex County Council has been fully involved in the development of our strategy and we very much value the contribution that has been made to the development of the strategy as well as the ongoing support for the wider work of TfSE.

We are therefore very pleased to see our transport strategy referred to within the wider policy context in which your plan sits, and also that that the challenges and key issues identified within your plan align well with the strategic goals, priorities and objectives set out in our strategy.

Our transport strategy seeks to deliver sustainable economic growth that achieves the right balance between the economic, social and environmental pillars of sustainable development. This means that any intervention in the area's transport networks to address connectivity challenges must ensure that the environment is protected and where possible enhanced and that opportunities to

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improve the health, wellbeing and quality of life for everyone are realised. The ambition and shift in approach set out in our strategy includes the need to move away from a predict and provide approach based on planning for vehicles to one based on planning for people and places. It involves a shift towards a decide and provide approach to transport provision based on choosing a preferred future with preferred transport outcomes encapsulated in our 2050 Vision.

Transport is the single biggest contributor to greenhouse gas emissions in the south East and across the UK. This needs to change, so our transport strategy includes a commitment to meet the Government's target of achieving net zero carbon emissions by 2050. To achieve this and our wider 2050 vision, we need to make better use of the infrastructure we already have – reducing the need to travel through increased investment in digital and other technology and providing alternative ways for people to go about their business through increased investment in public transport and active travel.

The Government has recently published its Transport Decarbonisation Plan (TDP) which sets the government's commitments and the actions needed to decarbonise the entire transport system in the UK. It is clear that in order to deliver the commitments set out in the TDP bold actions will be necessary. We note that the both the vision and objective 7 set out in your plan state that "the transport network will be on a pathway to net zero carbon by 2050". However, in line with the TDP and the TfSE strategy we would encourage and support you making a firmer commitment to achieving that target in the final version of your plan.

Overall, whilst we welcome the vision you set out in your Transport Plan, there is an opportunity to include more of the ambition and the shift in approach articulated in our transport strategy translated through to the objectives and policies that follow from the challenges and key issues identified in your plan.

We look forward to working together with you as you continue to develop your plan, and we would be happy to discuss any opportunities for further collaboration and sharing of data to our mutual benefit. This will help ensure that our studies and your transport plan align in their thinking and outputs.

This is an officer response. The TfSE Shadow Partnership Board next meets on 18 October 2021 when it will consider this response. A further iteration of it may follow after that meeting.

Yours sincerely,

Rupert Clubb
Lead Officer
Transport for the South East

Emailed to:
surreytransportplan@surrey.gov.uk

22 October 2021

Dear Sirs,

Transport for the South East (TfSE) response to Surrey Local Transport Plan 2022-2032 (LTP4) consultation

I am writing to you as lead officer for Transport for the South East (TfSE) in response to the consultation on your Surrey Local Transport Plan 2022-2032 (LTP4).

TfSE is a sub-national transport body which represents sixteen local transport authorities in the South East of England. These are Brighton and Hove, East Sussex, Hampshire, Kent, Medway, Surrey, West Sussex, the Isle of Wight, Portsmouth and Southampton, and the six Berkshire unitary authorities. These authorities are represented on the Partnership Board, which is its decision-making body, along with representatives from the region's five Local Enterprise Partnerships, district and borough authorities, protected landscapes, Highways England, Network Rail and Transport for London.

TfSE provides a mechanism for its constituent authorities to speak with one voice on the transport interventions needed to support sustainable economic growth across its geography. High-quality transport infrastructure is critical to making the South East more competitive, contributing to national prosperity and improving the lives of our residents.

TfSE welcomes the opportunity to comment on the Surrey Local Transport Plan 2022-2032 (LTP4). As you will be aware TfSE published a thirty-year transport strategy for the South East in July 2020, which sets out an ambitious vision for our area in 2050. As one of our constituent authorities, Surrey County Council has been fully involved in the development of our strategy and we very much value the contribution that has been made to the development of the strategy as well as the ongoing support for the wider work of TfSE.

We are very pleased to see our transport strategy referred to within your draft Local Transport Plan and that the challenges and key issues identified within your plan align well with the strategic goals, priorities and objectives set out in our strategy.

Our transport strategy seeks to deliver sustainable economic growth that achieves the right balance between the economic, social, and environmental pillars of sustainable development. This means that any intervention in the area's

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transport networks to address connectivity challenges must ensure that the environment is protected and where possible enhanced and that opportunities to improve the health, wellbeing and quality of life for everyone are realised. The ambition and shift in approach set out in our strategy includes the need to move away from a predict and provide approach based on planning for vehicles to one based on planning for people and places. It involves a shift towards a decide and provide approach to transport provision based on choosing a preferred future with preferred transport outcomes encapsulated in our 2050 Vision.

Transport is the single biggest contributor to greenhouse gas emissions in the south East and across the UK. This needs to change, so our transport strategy includes a commitment to meet the Government's target of achieving net zero carbon emissions by 2050. To achieve this and our wider 2050 vision, we need to make better use of the infrastructure we already have – reducing the need to travel through increased investment in digital and other technology and providing alternative ways for people to go about their business through increased investment in public transport and active travel.

The Government has recently published its Transport Decarbonisation Plan (TDP) which sets the government's commitments and the actions needed to decarbonise the entire transport system in the UK. It is clear that in order to deliver the commitments set out in the TDP bold actions will be necessary.

TfSE very much welcomes the bold vision and ambition set out in your draft Local Transport Plan. We fully support your commitment to achieving net zero carbon emissions by 2050 and commend you on your recognition of both the scale of challenge that this presents and the step change to future planning for transport that will be required to achieve this.

We welcome the alignment of the approach you have adopted to planning for the future development of the transport system to that set out in our transport strategy. In particular we welcome the move away from the traditional transport planning approach of 'planning for vehicles' towards a clear focus on 'planning for people and places'.

The use of the 'avoid, shift, improve' principle to achieve carbon reduction aligns well with the approach we are adopting in our current area study work, which will require the broad mix of policies and measures that you have set out in your draft Local Transport Plan.

We look forward to working together with you as you continue to develop your Local Transport Plan, and we would be happy to discuss any opportunities for further collaboration and sharing of data to our mutual benefit. This will help ensure that our studies and your transport plan align in their thinking and outputs.

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This is an officer response. The TfSE Shadow Partnership Board next meets on 24 January 2022 when it will consider this response. A further iteration of it may follow after that meeting.

Yours sincerely,

Rupert Clubb
Lead Officer
Transport for the South East

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Emailed to: appgsoutheast@secouncils.gov.uk

Wednesday 12 January 2022

Dear Sir/Madam,

Transport for the South East's response to the All-Party Parliamentary Group for the South East's call for evidence

I am writing to you as lead officer for Transport for the South East (TfSE) to provide a response to the call for evidence regarding 'financing the future – what does levelling-up mean for South East England?'

TfSE is a sub-national transport body (STB) bringing together leaders from across the local government, business and transport sectors to speak with one voice on our region's strategic transport needs. Since its inception in 2017, TfSE has quickly emerged as a powerful and effective partnership for our region and our ambition is to become a statutory body with devolved powers over key strategic transport issues.

Our principal decision-making body, the Partnership Board, brings together representatives from our 16 constituent local transport authorities, five Local Enterprise Partnerships, district and borough authorities, protected landscapes, Highways England, Network Rail and Transport for London. Together, our partnership represents more than 7 million people and 350,000 businesses in the South East and benefits from invaluable expertise and insight from those responsible for our region's strategic transport networks.

The South East has much to offer in the context of devolution and levelling up and the importance of our international gateways on the prosperity of the UK is significant. However, the South East also has some of the most deprived communities in England. The UK's prosperity depends on many local factors including housing, skills provision, the ability to fund services, land use and transport connections as well as the availability of public goods and services. All of this is facilitated by transport and communication links. If we are to build back better and provide opportunities for all then we must look again at what devolution can offer the levelling up agenda.

We believe TfSE offers a credible vehicle for devolution and levelling up in the South East. Our partnership has clear democratic accountability, strong stakeholder support and engagement, a track record of delivery in partnership with local and national partners, a thirty-year transport strategy in place and a strategic investment plan imminent.

We are ready to receive greater powers and responsibilities to support a devolved approach and we would encourage government to consider a devolved approach to infrastructure investment

funding, enabling partnerships such as ours to deliver the kinds of transformational integrated investment programmes needed to support sustainable economic recovery and growth and meet our carbon commitments. We would hope that these points are addressed in the forthcoming Levelling Up White Paper. It is important the White Paper recognises that Sub-national Transport Bodies can offer a mechanism for devolution in areas such as the South East which do not currently have mayoral combined authorities.

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Sub-national Transport Bodies' place-based approach enables infrastructure investment to level up areas. STBs have worked quickly and effectively, adding value by supporting the decision makers in Whitehall and Westminster. Using the strength of their partnership, STBs set a clear strategic direction for improved connectivity within their regions, as well as inter-regional journeys. STBs bring together the void between land use planning and transport and provide a spatial context to improve prosperity. By the end of 2021, each of the seven STBs in England had a transport strategy/plan in place or in draft. Developed using robust evidence bases, in partnership with planning authorities, and through public consultation, these provide a focal point for prioritising infrastructure investment across English regions. As democratically accountable sub national bodies, STBs provide a unified voice to the Government by setting objectives and aligning activity across their regions. STBs are supported locally and their important role has been recognised by Ministers. There is a clear opportunity for STBs to take a greater role, given their wealth of knowledge and collaborative approaches at regional level, to assist Government in delivering on the levelling-up agenda.

Central government funding approaches should adapt to help us meet the levelling up challenge. At a national level, transport infrastructure priorities tend to be identified on a network or modal basis with separate nationally significant infrastructure priorities identified for road and rail. This siloed approach to investment tends to lead to the development of specific schemes aimed at solving a particular problem or to bring about general improvements in network performance. Arguably the focus on facilitating the economic recovery from Covid-19 and levelling up particular areas, requires a more integrated, place based, programme approach to infrastructure investment that looks across different transport modes and different types of economic infrastructure. This is needed ensure that the right interventions are identified that will maximise the benefits of infrastructure investment in a particular area. The approach to scheme appraisal will also need to evolve to enable the benefits of cross-sectoral programmes of investment spanning different Government departments to be identified. A devolved regional investment pot would enable public and private sector partners, via STBs or other suitable devolved structures, to better plan and deliver the kinds of schemes which can enable genuinely transformational change and meet the levelling up challenge.

Ultimately strengthening regional infrastructure planning capability would facilitate a more integrated and place based approach to infrastructure provision at the regional and local level. It would also, crucially, support a more integrated approach to both social and economic infrastructure development, design and implementation needed to deliver increased housing supply and the Government's levelling up agenda while achieving net zero carbon emissions.

STBs are focused on place-based outcomes rather than siloed infrastructure funding streams. Their transport strategies incorporate both local and national policy outcomes allowing local partnerships to more effectively prioritise, manage and deliver a portfolio of infrastructure relevant to a place. STBs therefore have the ability to land complex policy and funding models into a place. By working with STBs, Government can operate within the silos that exist and yet still be assured that, at a regional level, STBs will take a place-based and multimodal approach to connectivity. A regional funding allocation would enable more effective prioritisation and ensure that the longer term investment pipelines that flow from the STB's transport strategies are affordable.
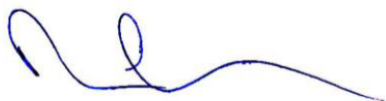
We believe Government should be flexible about its approach to devolution and who should co-ordinate levelling-up activity. For those locations, including the South East, that have either not been central to discussions around devolution or are not suited to current approaches around mayoral combined authorities, other ways to devolve should be considered.

Levelling up presents an opportunity to devolve the tools needed to bring about a step change in prosperity that not only benefits the South East but the wider UK economy. We know transport is a major facilitator of growth and the bold ambition of TfSE enables local communities to thrive and attract inward investment. In addition, it provides the key network for the movement of goods and service to the rest of the UK, supporting union connectivity through the South East extensive network of ports and airports.

TfSE consents to this response being placed on your webpage and both officers and political leaders of TfSE are more than happy to speak at a meeting of the APPG if further insight is required.

This is an officer response. The TfSE Partnership Board meets on 24 January 2022 and will consider the draft response and a further iteration of this response may therefore follow.

Yours sincerely,

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<mark>XX</mark> January 2022

To whom it may concern,

Transport for the South East (TfSE) response to Office of Rail and Road (ORR) consultation on their role and approach to Road Investment Strategy 3

I am writing to you in my role as Chair of Transport for the South East (TfSE) in response to your consultation on your role and approach to your assessment of the government's and National Highways' plans for the development of Road Investment Strategy 3.

This response was considered agreed by the TfSE Board at their meeting on 24 January 2022.

TfSE is a sub-national transport body (STB) representing sixteen local transport authorities in the South East of England. These are Brighton and Hove, East Sussex, Hampshire, Kent, Medway, Surrey, West Sussex, the Isle of Wight, Portsmouth and Southampton, and the six Berkshire unitary authorities. These authorities are represented on the Partnership Board, which is TfSE's decision-making body, along with representatives from the region's five Local Enterprise Partnerships, district and borough authorities, protected landscapes, Highways England, Network Rail and Transport for London.

TfSE provides a mechanism for its constituent authorities to speak with one voice about the transport investment needed to support sustainable economic growth across its geography.

In 2020 TfSE published a thirty-year transport strategy for the South East that sets out an ambitious 2050 vision for the area. We are currently undertaking a programme of area studies to identify multimodal packages of interventions that will be needed to deliver the transport strategy. These packages are likely to include a number of highway improvement schemes on the Strategic Road Network that would need to be delivered through future Road Investment Strategies. The outputs form the area studies will be brought together in a draft Strategic Investment Plan (SIP) that we are planning to publish for consultation in June 2022.

We are familiar with the important role that ORR plays in monitoring the costs, efficiency and performance of National Highways in accordance with the 2015

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Highways England Licence. Your attendance at the bi-monthly joint STB meetings has provided a mechanism for keeping all the STBs up to date with the progress of your work.

Overall, your proposed approach to executing the duties of your role, as set out in your December 2021 consultation document is both coherent and comprehensive. We do not have any specific comments on the way in which you propose to 'check and challenge' the cost, efficiency and deliverability of the emerging roads investment plan.

A key aspect of your consideration about whether National Highways have met the requirements of their licence is to determine the extent to which they have exercised their duties in a manner that is 'open and transparent', 'positive and responsive', and 'collaborative'. You set out in paragraph 3.61 of your consultation document how you propose to assess this specifically in relation to the development of the route strategies. Your approach will involve monitoring the extent and quality of the stakeholder engagement process, attending a sample of stakeholder events and look for evidence of how National Highways has taken account of stakeholder's views. It is our view that you should undertake a stakeholder survey to establish their views on the way in which National Highways has engaged with them both on the route strategies and more generally through-out the RIS process. It would also provide you with the opportunity to ask them to identify ways in which this engagement activity could be improved.

We look forward to continuing to work with you on the ongoing development of the third Road Investment Strategy.

Yours sincerely,

Cllr Keith Glazier
Chair
Transport for the South East

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