

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

Date of meeting: **13 March 2023**

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**

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***RECOMMENDATIONS:***

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

- (1) **The House of Commons Transport Committee – Call for evidence - Inquiry into Strategic Road Investment;**
  - (2) **All-Party Parliamentary Group for the South East – Call for evidence - Transport Infrastructure Inquiry 2023; and**
  - (3) **The Planning Inspectorate – Registration of interested parties - Application for development consent by National Highways for Lower Thames Crossing.**
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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:

- 1. The House of Commons Transport Committee – Call for evidence - Inquiry into Strategic Road Investment;**
- 2. All-Party Parliamentary Group for the South East – Call for evidence - Transport Infrastructure Inquiry 2023; and**
- 3. The Planning Inspectorate – Registration of interested parties - Application for development consent by National Highways for Lower Thames Crossing**

**2. The House of Commons Transport Committee – Call for evidence - Inquiry into Strategic Road Investment**

2.1 The strategic road network in England comprises more than 4,300 miles of motorways and major A-roads. The Department for Transport plans improvements to these roads through five-year road investment strategies and sets priorities for the strategic road network. This inquiry is looking into how well the current Road Investment Strategy (RIS2) is being managed, and what the Government's priorities should be for future investment.

2.2 This consultation closed on 06 February 2023 and the officer level response that was submitted is contained in Appendix 1. The consultation response proposed continued collaborative working and greater engagement with STBs to help ensure contribution by schemes to wider local regional and government objectives.

2.3 Pointing to engagement at an earlier stage with National Highways, the response explained that TfSE would welcome the opportunity through its technical work to assist with setting strategic objectives that consider the SRN holistically as part of the wider transport network.

2.4 A number of suggestions based on experience to date were also included to help ensure that RIS3 is achievable and delivers on policy objectives; also highlighting the vital role the SRN has in supporting local transport plans and targets.

### **3. All-Party Parliamentary Group for the South East – Call for evidence - Transport Infrastructure Inquiry 2023**

3.1 Following a report by the Localis Think Tank highlighting the importance of the South East in the UK's post-Brexit export ability and attractiveness to foreign trade and investment, the All-Party Parliamentary Group for the South East is considering the role for transport infrastructure in underpinning Britain's plan to trade and grow in the context of The South East and 'Global Britain'.

3.2 This consultation closed on 24 February 2023 and the officer level response that was submitted is contained in Appendix 2. The consultation response proposes TfSE's Strategic Investment Plan (SIP) as a framework for investment in strategic transport infrastructure, services, and regulatory interventions and summarises key attributes of the resulting evidence-based framework for delivery of the published transport strategy.

3.3 Responses were provided to key questions raised in the consultation: whether the transport infrastructure in the south east is fit for purpose; and how delivery of transport infrastructure will enhance the government's ambitions for Global Britain, in particular pointing to TfSE's Freight, Logistics and International Gateways Strategy and its focus within the SIP.

3.4 Further to this submission, on the 08 March 2023 Rupert Clubb spoke at the session held by the All Party Parliamentary Group for the South East for their transport infrastructure inquiry 2023.

### **4. The Planning Inspectorate – Registration of interested parties - Application for development consent by National Highways for Lower Thames Crossing**

From 09 January 2023 to 24 February 2023 the Planning Inspectorate opened registration of interested parties for the application of development consent by National Highways for the Lower Thames Crossing scheme. Interested parties were required to make a brief relevant representation (a summary of a person's views on an application, made in writing). An Examining Authority is also appointed at the Pre-examination stage, and all Interested Parties will be invited to attend a Preliminary Meeting, run and chaired by the Examining Authority.

An opportunity to submit a more detailed representation will be available in due course.

The officer level response that was submitted is contained in Appendix 3. The relevant representation does express support for the Lower Thames Crossing scheme however it also highlights areas of concern that need to be considered. Particularly in relation to air quality, achieving net zero, lorry parking facilities and ensuring the strategic road network is not considered in isolation due to wider traffic impacts.

## **5. Conclusion and recommendations**

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

**RUPERT CLUBB**  
**Lead Officer**  
**Transport for the South East**

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## **Submission from Transport for the South East**

### **Transport for the South East response to Transport Select Committee Inquiry: Strategic Road Investment in England**

#### **1.0 Introduction**

- 1.1 Transport for the South East (TfSE) is a sub-national transport body (STB), which 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. Authorities are represented on the Shadow Partnership Board along with representatives from the region's five Local Enterprise Partnerships, District and Borough authorities, the protected landscapes in the TfSE area, Highways England, Network Rail and Transport for London.
- 1.2 TfSE provides a single voice on the transport interventions needed to support sustainable economic growth across its geography. The south east is crucial to the UK economy and is the nation's major international gateway for people and business with some of the largest ports and airports in the country. High-quality transport infrastructure is critical to making the south east more competitive, contributing to national prosperity and improving the lives of our residents.
- 1.3 Transport for the South East welcomes the opportunity to respond to the Transport Select Committee inquiry into Strategic Road Investment in England.

#### **2.0 General comments**

- 2.1 Ministers have set out 2 core functions that the Department for Transport (DfT) supports STB's to deliver:
  1. Develop and maintain a transport strategy for our region.
  2. Provide advice to Ministers on prioritising transport investment.
- 2.2 In 2020 TfSE published a thirty-year transport strategy that sets out an ambitious 2050 vision for the area. Through a programme of area studies we identified multimodal packages of transport interventions that will be needed to deliver the transport strategy, alongside developing a freight and logistics strategy, future mobility strategy and decarbonisation pathways work. Underpinned by this credible, evidence based technical programme, we consulted on our draft Strategic Investment Plan (SIP) in the autumn of 2022. When published in spring 2023, the SIP will present a compelling case for future decision making which will help us create a more productive, healthier, happier and more sustainable south east.
- 2.3 Our SIP aligns with and supports government priorities to rapidly decarbonise the transport system, improve public health outcomes, reduce congestion and improve road safety, level-up left-behind communities and facilitate sustainable economic growth in the south east. However, we are clear that it cannot be growth at any cost. We need to make better use of existing assets and corridors and make sure new and emerging technology is used to its full potential to boost physical and digital connectivity. There is a need for more joined up planning,

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particularly between transport and housing, to help build more sustainable communities and enable more efficient business operations, putting the strategic transport infrastructure in place that enables communities to thrive and live happier, healthier, more active lives. Securing the right investment in the SRN is a crucial part in delivering our transport strategy.

- 2.4 National Highways operate under a licence through which the Secretary of State for Transport sets out statutory directions and guidance. Given the role and importance of STB's transport strategies in setting out how the whole transport system in their areas should be developed we would ask that Government consider amending the licence to reflect the role of STB's and in doing so require National Highways to formally consider the advice provided by STB's through their transport strategies and investment plans, and to provide a formal response as to how that advice is reflected in the Road Investment Strategy.

### **3.0 How effectively the current Road Investment Strategy (RIS2) enhancements portfolio has been managed to date;**

- 3.1 In common with other STB's TfSE provided advice to Government on the south east's priorities for investment in the SRN through RIS2. However, unfortunately there was then no further engagement as to how that advice was reflected in the RIS2 document prior to its publication.
- 3.2 Through the development and appraisal of schemes, there still seems to be a strong focus on the economic case for the intervention. The HM Treasury "Green book" review stressed the need to provide a greater focus on the strategic case in decision making, to ensure that projects demonstrate how they contribute to wider local, regional and government objectives. TfSE welcomes this approach. Greater engagement with STB's, aligning with our transport strategies and investment plans, is crucial to develop a strong strategic case for interventions to support this aim.
- 3.3 TfSE supports the Office of Rail and Road's (ORR) role and approach to their assessment of the government's and National Highways' plans for the development of RIS3. A key aspect of the ORR's consideration about whether National Highways have met the requirements of their license, 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'. The way in which TfSE and National Highways work collaboratively together has improved significantly over recent years, and this is welcomed. We have agreed a Joint Engagement Action Plan and have strong working relationships across a number of technical work areas.

### **4.0 Whether risks to the enhancements portfolio for the remainder of the RIS2 period are being well managed;**

- 4.1 TfSE has limited information about risk to the portfolio of RIS2 schemes and how it is being managed, and therefore we are not able to specifically comment on this question.

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4.2 A number of RIS2 schemes are included within our SIP, and so we would request that any significant risks to scheme delivery in our area should be shared allowing us comment on any proposed mitigation plans, and to consider any impacts on our own wider investment programme.

### **5.0 What the impacts of delays and cost overruns are on the overall programme, and whether the revised programme can be delivered to schedule and on budget;**

5.1 TfSE is not sighted on the detail of delays and cost overruns within RIS2 Programme and therefore cannot comment on this question.

5.2 We understand that there are budget pressures and also that delays to a number of RIS2 schemes is creating a funding tail that will need to be carried forward, potentially impacting on the number of new schemes able to be taken forward in RIS3. A number of RIS2 and RIS3 pipeline schemes are included within our SIP, and so we would request our inclusion in any review of the overall programme or scope of any schemes in our region ensuring that we can consider any impacts on the timing of schemes or broader connectivity issues affecting our own wider investment programme.

### **6.0 What progress is being made on planning for the next Road Investment Strategy;**

6.1 TfSE strongly welcomes the increased engagement and input that we have had with both DfT and National Highways in planning for the next Road Investment Strategy. It is imperative that the evidence base developed through our transport strategy and SIP underpins and drives planning for RIS3.

6.2 National Highways engaged with TfSE and our local authority partners through a series of workshops as they gathered evidence for their Route Strategies, providing us the opportunity to input on the issues, challenges and opportunities for the SRN. This represents a step change from the previous RIS2 planning process. It has enabled the consideration of the regional priorities set out in in our Transport strategy and SIP and provides much greater opportunity for the SRN to be considered as part of the wider transport network and not in isolation. We also welcome the work National Highways have undertaken to consider the role of the SRN in different locations and its impact on the wider environment (particularly in urban areas).

6.3 TfSE have provided National Highways with access to the extensive evidence base developed through our own technical work programme, including our area studies and through the development of our SIP. National Highways colleagues attended our stakeholder groups providing reciprocal information sharing and input, leading to a greater alignment between our respective workstreams and priorities.

6.4 TfSE also provided feedback on the draft Route Strategy Reports relevant to our region and continue to be kept informed of the overall RIS3 development process and programme. We look forward to this

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collaborative approach continuing and to providing further input and feedback through the forthcoming consultations on the SRN Initial Report, Connecting the Country strategy and Route Strategies Overview Reports, and as the Draft RIS3 is developed.

- 6.5 TfSE have also been engaged on work carried out by National Highways on a number of strategic studies and “RIS3 pipeline” schemes within our area. Whilst we are pleased to see this more detailed work and individual schemes progressing, this engagement has not been consistent and has not always been as open or collaborative as that for the strategic level of RIS3 development. This is unfortunate as we consider that TfSE and other STB’s can really add value to National Highways work around the early stages of scheme development when the initial cases are being made for the need for intervention. The outputs from our technical work and the local expertise from the respective local authorities can significantly strengthen the strategic cases for schemes, and it is at this stage that we can assist with setting strategic objectives that consider the SRN holistically as part of the wider transport network. We would welcome greater engagement in these early stages of scheme development.

### **7.0 What lessons from RIS2 need to be incorporated into RIS3 to ensure it is achievable and delivers on policy objectives;**

- 7.1 Since RIS2 STB’s have become more established. Recognising our core function to provide advice to Ministers on prioritising transport investment, we consider that the National Highways Licence should be amended to ensure that the advice provided by STB’s through their transport strategies and investment plans is formally considered and responded to as RIS3 is developed.
- 7.2 The improved engagement and collaboration is welcomed and should be continued throughout the whole RIS3 development process to ensure that the objectives set for RIS3 align with the agreed outcomes for the south east set out in our Transport Strategy and SIP.
- 7.3 The SRN is one component of the wider transport network, and it is imperative that it is considered holistically alongside other networks and modes. This should include, but not be limited to, considering the role of the SRN in facilitating travel by other modes, such as public transport and active travel, the interactions between the SRN and the major and local road networks, and any impacts that occur, including those arising from carbon emissions. Should interventions on the SRN adversely impact other networks, it is vital that any mitigation required is planned and provided for accordingly through that holistic view, and not left to local transport authorities to seek rectify through other programmes.
- 7.4 In planning for RIS3, consideration should also be given to the role of the SRN in facilitating development. Historically, network performance considerations have tended to outweigh role of SRN in providing access to much needed new homes, but this needs to change through a more integrated role of highway infrastructure facilitating development.

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7.5 The SRN also has a vital role to play in supporting local transport plans and targets, for example with the monitoring and reduction in transport related carbon emissions. A holistic view the across whole network will be essential to drive the reductions in demand necessary to meet those carbon reduction targets.

### **8.0 Whether the Government's current and forthcoming roads investment programme is meeting the current and future needs of consumers and business;**

8.1 The top concerns raised by users through Transport Focus' report in August 2021 tended to focus more on the operational role of National Highways. However, to address these challenges it is crucial to ensure the SRN is fit for purpose, and this requires a more integrated view of the function of the SRN within the wider transport network.

8.2 The RIS2 programme is currently delivering a number of improvements across the SRN within the TfSE area providing benefits to consumers and businesses across the region. However, a number of key challenges remain to be addressed on the network in order to provide consumers and businesses with the safe, efficient, reliable and seamless end to end journeys they expect and need from the road network as a whole.

8.3 Congestion and resilience of the SRN remain issues for the SRN across the south east and this undermines the productivity of our economy. Limited east-west connectivity coupled with the SRN being of an inconsistent standard through the region, mean journeys of a similar distance can take widely differing times depending on which part of the network is used. This means the SRN is unable to fulfil its strategic function and that there are few viable alternatives for motorists caught up in disruption.

8.4 Parts of the SRN pass through protected landscapes and urban areas (for example at Worthing, Chichester, Guildford, and Hurst Green) causing environmental and severance issues which undermines the quality of life for residents and compromises the attractiveness of active travel in those communities. The inconsistent standard of the SRN places communities at a disadvantage, including some of our coastal communities which are already among the least prosperous in England.

8.5 The south east serves several of the busiest ports and airports in the UK. While these are generally well connected, there are challenges with managing disruption on some corridors – particularly to Heathrow Airport, Gatwick Airport, Solent Ports and Southampton Airport, and Port of Dover. There is also a need to support growth – notably at Southampton and Gatwick.

8.6 A significant portion of UK international trade passes through the south east. It is critically important that the highway network has the capacity and resilience to manage future disruption and ensure trade can flow as seamlessly as possible. Linked to this it is crucial that appropriate facilities are provided for Freight, including rest areas. The M2 and M20 corridors are



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particularly susceptible to disruption, which can force heavy traffic onto local roads.

- 8.7 TfSE's SIP advocates for a "whole route" approach to planning, not continually adding capacity or creating new corridors, but making existing corridors work for variety of modes. Planning to deliver an end-to-end solution, providing a consistent standard of route that protects landscapes, townscapes and people, supports regeneration and growth, segregates local and strategic traffic and unlocks multi-modal opportunities.
- 8.8 To effectively address these challenges, planning for RIS3 must consider journeys and networks holistically to improve transport outcomes. Separating modes into silos for strategic development regardless of collaboration makes alignment and planning for people and their needs difficult.

### **9.0 Whether the Government's roads investment programme aligns with other policy priorities, such as decarbonisation, levelling up, productivity and growth;**

- 9.1 Through our increased engagement with RIS3 planning and the Route Strategies development, it is clear that a greater emphasis is being given to these wider policy priorities as the SRN Objectives have been developed. It is however vital that there remains a focus on these priorities as individual schemes are developed and investment decisions are taken.
- 9.2 These Government policy priorities are also key priorities within TfSE's transport strategy and SIP. The SIP demonstrates how transport investment in the south east will yield material economic, social, and environmental returns for our residents, businesses, and visitors, improved public health outcomes and support the UK economy enabling Government to achieve its wider carbon, trade, and levelling-up objectives.
- 9.3 The scale of the challenge to meet decarbonisation targets is significant and should not be underestimated. Road transport needs to be rapidly decarbonised if the government's mandated target of achieving net-zero carbon emissions by 2050 is to be met. TfSE's Decarbonisation Pathways work identifies that "in order to facilitate an effective pathway to net zero it is paramount to plan to optimise the role of public transport, active travel, and zero emission vehicle interventions, along with demand management and behaviour change interventions."
- 9.4 Therefore the highways interventions within our SIP represent a step-change away from traditional "predict and provide" capacity enhancements of previous decades. Adopting a "decide and provide" approach, aligned with our vision and supporting not only strategic movement of vehicles but our places and communities. Road based interventions must be complimented by others that manage demand and employ digital technology, reduce the number of trips, accelerate the decarbonisation of road vehicles, and promote sustainable travel.

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- 9.5 As described above, the SRN has a crucial role to play in levelling up the south east's left behind communities.
- 9.6 To ensure that the Government's roads investment programme aligns with other policy priorities, such as decarbonisation, levelling up, productivity and growth, it is therefore essential that the advice provided by STB's through their transport strategies and investment plans is formally considered and responded to as RIS3 is developed.

### **10.0 How RIS3 should take account of technological developments, and evidence on ways of increasing capacity on the Strategic Road Network (such as smart motorways and potential alternatives to them).**

- 10.1 The transport sector's response to the decarbonisation challenge is gathering real momentum and it needs to be recognised that, on its own, the conversion of the vehicle fleet to clean fuels will not deliver the reductions in carbon emissions that are needed. The Covid pandemic accelerated trends that had been emerging over decades around home working and virtual access to services. The countries response to the pandemic showed that both our need to travel and the way in which we travel is susceptible to change.
- 10.2 Innovative technologies present opportunities and challenges for transport, enabling manufacturers to improve vehicle safety and environmental performance. Also enabling delivery of new more sustainable ways of transport and business models that improve information, accessibility, and choice for travellers. Properly managed, the transport technologies of the future will make journeys faster, safer, greener, easier, more comfortable, and more affordable. They will make our environments quieter and less polluted, and they will enable us to provide mobility as a service, integrated and accessible to all.
- 10.3 In planning future highways investment, there is a need to look wider than the traditional view of a road. To move away from focussing on increasing capacity and to consider highways as multi-modal movement corridors, providing for journeys by electric and hydrogen powered vehicles, bus, and all forms of active travel. This will include also planning for infrastructure to support the uptake of zero emission vehicles. TfSE is currently undertaking work on an EV charging strategy for the region.
- 10.4 There is an increasing likelihood we will need to rely on digital connectivity, and 4G, broadband and emerging 5G connectivity will provide the foundations for many new technologies and associated services that will both change the nature of future travel demand and in some instances reduce the need to travel.
- 10.5 Issues surrounding Smart Motorways need to be resolved to prioritise safety, and until this can be assured TfSE support the current pause to the programme. There are other emerging technologies such as connected and autonomous vehicles that could improve the capacity of the network where this is specifically required. Consideration should also be given to

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the opportunities to trial new technologies within the managed environment of smart motorways.

- 10.6 Data that is used or collected within this new technological environment must be shared, in order that the whole transport system may benefit and continuously improve.
- 10.7 It is vital that planning for RIS3 takes account of and maximises the benefits from these changes and opportunities, and that the programme can adapt to new and emerging technologies.

**Transport for the South East**  
**February 2023**

Emailed to: [appgsoutheast@secouncils.gov.uk](mailto:appgsoutheast@secouncils.gov.uk)

Friday 24<sup>th</sup> February 2023

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 'The South East and 'Global Britain': what role for transport infrastructure in underpinning Britain's plan to trade and grow?

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. We have a [30-year transport strategy](#) in place which carries real weight and influence and will shape government decisions about where, when and how to invest in our region to 2050. The Secretary of State has confirmed that they will have regard to our strategy in developing new policy. We work closely with the Department for Transport (DfT) to provide advice to the Secretary of State 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 8.3 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.

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 and a track record of delivery in partnership with local and national partners.

Our [Strategic Investment Plan \(SIP\) for South East England](#) provides a framework for investment in strategic transport infrastructure, services, and regulatory interventions in the coming three decades. The plan provides a framework for delivering our Transport Strategy, which:

- is a blueprint for investment in the South East;
- shows how we will achieve our ambitions for the South East;
- is owned and delivered in partnership;
- as set out in the legislation to establish sub-national transport bodies, this document is intended to provide advice to the Secretary of State for Transport;
- is a regional plan with evidenced support, to which partners can link their own local strategies and plans – a golden thread that connects policy at all levels;
- provides a sequenced plan of multi-modal investment packages that are place based and outcome focused; and
- examines carbon emissions impacts as well as funding and financing options.

The plan presents a compelling case for action for investors, including government departments – notably the Treasury and Department for Transport (DfT) – as well as private sector investors. It is written for and on behalf of the South East's residents, communities, businesses and political representatives.

Investing in the South East will yield material economic, social, and environmental returns for our residents, businesses, and visitors, improved public health outcomes and supporting the UK economy and enabling Government to achieve its wider carbon, trade, and levelling-up objectives.

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.

### **Is existing transport infrastructure in the South East fit for purpose?**

The region's existing transport networks require significant investment and improvement. If we do not act, then many of the investment priorities included in our SIP will not be addressed, and associated opportunities will not be realised. More specifically, there is a material risk that:

- the south east will not decarbonise its transport system fast enough;
- the south east's transport systems will not adapt to a post-pandemic, post-Brexit environment;
- housing growth will stall and house prices will remain unaffordable for too many of the south east's residents (and potential residents);
- the south east's left behind and more deprived communities will be unable to "catch up"; and
- improved public health outcomes will not be achieved, with disproportionate negative impact on the most vulnerable.

Our plan does not just focus on new build infrastructure. Packages include measures that make better use of existing assets and corridors, and support more efficient business and operating models. For example, there are proposals to enhance cross-regional rail and freight services using the existing rail network without having any detrimental impact on passenger services by utilising capacity released from a decline in five-day commuting. There are also proposals for a High Speed 1 / Marsh Link - Hastings, Bexhill and Eastbourne Upgrade.

### **How will the delivery of transport infrastructure enhance the government's ambitions for Global Britain?**

Through our SIP and our [Freight, Logistics and International Gateways Strategy](#), we aim to enhance the capacity and contribution of the freight and logistics sector to the South East's economy

through improved connectivity to Global Gateways, including Freeports, and adapt to changing patterns of freight demand and trade, including making the most of innovations in sustainable first and last mile delivery.

Through improving access to global gateways the South East will increase domestic and international trade by reducing trading costs. The interventions in our SIP will facilitate trade in the south east and – at a much larger scale – between the UK and Mainland Europe. This will enable the UK to prosper as it adapts to a new trading relationship with the European Union and recovers from the global COVID-19 pandemic.

Our own modelling suggests the transport interventions included in the SIP alone will generate 21,000 new jobs; an additional £4.1 billion growth in GVA a year by 2050; and additional 550,000 rail trips a day and 1.6 million bus, mass transit and ferry trips a day, and take over four million car trips a day off the roads of the South East. This growth will not come from transport alone, but transport will be an important part of the jigsaw and an enabler of growth in other sectors. Realising this opportunity will require an integrated approach to investment and delivery and will require working across institutional, sectoral, and spatial boundaries.

There are several drivers of growth that transport investment supports:

- **Connecting businesses** with faster and more reliable travel times. Our SIP enables the South East's towns and cities to boost their productivity by better integrating and sharing their economic assets, wider sharing of resources and knowledge, and will provide businesses with easier access to a large, diverse, highly educated work force.
- **Expanding the workforce** by easier matching of jobs to people. The SIP will enable firms to access and recruit a larger labour supply and provide wider employment opportunities for workers and those seeking to work.
- **Enabling development** through unlocking sites and locations that were previously poorly connected. The SIP will provide the sustainable transport capacity and connectivity for net zero growth and development.
- **Accessing global gateways** to increase domestic and international trade by reducing trading costs. The SIP facilitates trade in the South East and – at a much larger scale – between the UK and Mainland Europe. This will enable the UK to prosper as it adapts to a new trading relationship with the European Union and recovers from the global Covid pandemic.
- **Directing investment to level-up left behind communities.** The SIP makes the South East an even more attractive place to invest. It will bring areas up that are left behind relative to some other areas of the UK due to structural disadvantaged and resulting outcomes (e.g., low productivity and lower incomes and reduced health outcomes) or places that are held back by transport network constraints (e.g., where development opportunities are stalled due to traffic constraints or local access to key services aren't there by public transport).

Doing nothing is not an option. We believe a range of multimodal and wider policy interventions are needed to realise our vision.

## Funding and Financing

TfSE has worked closely with the private sector to develop a funding and financing approach to our SIP which will ensure that we are not solely dependent upon government funding. We have considered a range of ways for TfSE to support funding and financing solutions – especially in terms of:

- developing business cases;
- assessing the broad spectrum of procurement routes (including those that lend themselves to private finance);
- helping identify and secure a broad range of funding sources for interventions (including thinking creatively about commercial revenues, user charges and new value-capture charging mechanisms); and
- supporting the efficient and accountable flow of funds to the interventions for which they are required.

TfSE intends to play an important role in working with the government and other stakeholders on developing potential future options for road user charging. This includes influencing the direction of any national reform, supporting local partners in developing solutions for specific geographies, and more broadly ensuring that revenues from any future interventions can be efficiently and equitably applied to support priority capital interventions in the South East. Full details of our funding and finance ambitions can be found from [page 80 onwards here](#).

We are ready to receive greater powers and responsibilities 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.

### **Other relevant comments**

We also align with and support government priorities to rapidly decarbonise the transport system, improve public health outcomes, reduce congestion and improve road safety, level-up left-behind communities and facilitate sustainable economic growth in the South East. Highways opportunities in the SIP have a particular focus on those facilitating freight and bus movements to make the best use of the roads in our region. While emissions will improve with time as more vehicles are electric or hydrogen, the need to manage congestion and facilitate freight and bus movements will remain a particular focus within the SIP.

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 13<sup>th</sup> March 2023 and will consider the draft response and a further iteration of this response may therefore follow.

Yours sincerely,



### **Rupert Clubb**

Lead Officer, Transport for the South East

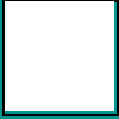
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**From:** NI Mail Distribution <[ni.mail.distribution@notifications.service.gov.uk](mailto:ni.mail.distribution@notifications.service.gov.uk)>

**Sent:** 24 February 2023 15:17

**To:** Mat Jasper <[mat.jasper@eastsussex.gov.uk](mailto:mat.jasper@eastsussex.gov.uk)>

**Subject:** Registration for project Lower Thames Crossing with the Planning Inspectorate



## Planning Act 2008: Receipt of Representation

Thank you for submitting your Representation on the application for development consent by National Highways for Lower Thames Crossing.

Your registration identification number is 20035773.

Please see the Planning Inspectorate's suite of Advice Notes for information about what happens next in the process:

<https://infrastructure.planninginspectorate.gov.uk/legislation-and-advice/advice-notes/>

Please note that the representations received will be published on the project page of the National Infrastructure Planning website as soon as practicable after the Applicant has certified that it has complied with its notification obligations. Details published on our website will be restricted to your name and the text of your Representation.

Please read our Privacy Notice

(<https://www.gov.uk/government/publications/planning-inspectorate-privacy-notices/customer-privacy-notice>) which explains how we will store and use your data.

If you did not make this registration then please ignore or delete this email or call the Planning Inspectorate helpline on 0303 444 5000 for more information.

Yours sincerely



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### Summary of your details

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### Your Representation:

Transport for the South East (TfSE) is a sub-national transport body (STB), which provides a single voice on the transport interventions needed to support sustainable economic growth across its geography which includes Brighton and Hove, East Sussex, Hampshire, Kent, Medway, Surrey, West Sussex, the Isle of Wight, Portsmouth and Southampton and the six Berkshire unitary authorities. The South East is crucial to the UK economy and is the nation's major international gateway for people and business with some of the largest ports and airports in the country. 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's 'Transport Strategy for the South East' (2020) sets out an ambitious vision for the area. Through area studies, we have identified

multimodal packages of transport interventions. Underpinned by a credible, evidence based technical programme, we consulted on our draft Strategic Investment Plan (SIP) in the autumn of 2022. When published in spring 2023, the SIP will present a compelling case for decision making.

TfSE supports the Lower Thames Crossing (LTC), our Transport Strategy and SIP identified the need for improvements to provide a more resilient corridor connecting the Channel Ports to the M25 and the north. Specifically named in our SIP this is a long standing, nationally significant scheme with considerable impact on the South East's transport system the LTC will:

Improve access to the North and Midlands via the northern part of the M25.

Divert demand away from the south west quadrant of the M25 where there is little scope for increasing capacity and traffic diverts onto local routes.

Help address key international gateway and freight journey challenges.

LTC needs to be delivered with minimal impact on the environment and communities. The points below outline areas that need to be considered:

- Our Transport Strategy highlights the need for improving air quality and achieving net zero by 2050. This scheme must not counteract efforts in improving air quality and achieving net-zero. National Highways must continue to regard environmental impacts. Particularly in relation to air quality, and the impacts on protected landscapes.
- Local opportunities and benefits must not be missed and should be maximised.
- We have previously raised concern over the absence of any rest and service facilities within the design. TfSE's Freight Logistics and International Gateways Study (developed as part of our Transport Strategy) recognised that inappropriate lorry parking is a significant issue in Kent.
- The LTC will increase pressure and have wider traffic impacts on

both the strategic and local road networks. It is vital that the Strategic Road Network (SRN) is not considered in isolation. Wider network improvements including those required on the major and local road networks must be delivered alongside the LTC to maximise benefits and minimise the impacts on local communities.

- o The A229 Bluebell Hill – Large Local Major
- o M2 (J7) Brenley Corner (RIS 3 pipeline)
- o A2 Dover Access (Lydden to Dover) (RIS3 pipeline)