

## Institution of Civil Engineers Green Paper: Does England need a national transport strategy?

### Draft Response from Transport for the South East

#### 1. Introduction

1.1 Transport for the South East (TfSE) welcomes the opportunity to respond to the Institution of Civil Engineers' (ICE) Green Paper on *Does England need a national transport strategy?*

1.2 TfSE is a sub-national transport body (STB) for the South East of England, 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) 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.

1.3 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.

1.4 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;
- 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.

1.5 TfSE welcome the contribution to this debate that the Green Paper provides, particularly as it terms 'the need for a clear focus on outcomes, combined with robust evidence and a holistic view of the entire transport network.' We trust that our response to the questions posed below provide value to the ICE.

## **2. (Question 1). What are the key gaps and challenges within the existing approach to transport planning in England? What are the long-term drivers of transport demand in England?**

2.1 A number of the observations made within the Green Paper are well-made. The current transport policy and delivery responsibilities across England are fragmented. In the TfSE area, for example, responsibilities for transport policy and delivery sit across a number of different national and regional bodies, as well as statutory bodies and agencies. This includes, but is not limited to:

- The Department for Transport, for nationally-significant transport priorities and funding of schemes and initiatives;
- National Highways, for the management and enhancement of the strategic road network;
- Network Rail, for the management and enhancement of local and strategic rail infrastructure;
- STBs, with responsibility for producing regional transport strategies;
- County councils, with their powers as local transport authorities (LTA) and local highway authorities (LHA);
- District councils, with their powers as local planning authorities, and some limited transport powers (e.g. taxi licencing);
- Unitary authorities, with the combined responsibilities of county councils and district councils;
- National parks authorities, with the planning powers associated with a local planning authority;
- Public transport operators, with the responsibility for operating public transport services either commercially or under contract.

2.2 Throughout the work of our partnership we have observed a number of gaps in addition to those identified in the Green Paper. These include the following:

- **Lack of a clear, multi-modal strategic direction aligned with funding and powers.** A significant learning experience from the development of our [transport strategy](#) is that at local, regional, and national level, there is a lack of a clear, multi-modal strategic direction for transport within England. The policy environment is characterised by siloed policy making, as ably articulated in the Green Paper, with little in the way of strategic co-ordination. STBs have attempted to overcome this issue through the development of their transport strategies and investment plans. For instance, TfSE has taken a multimodal approach to develop the proposals in its [Strategic Investment Plan](#). This has included a series of [Area Studies](#), work on [freight](#), and work on [future mobility](#). Although it needs to be emphasised that where there are issues that are modally-specific (e.g. capacity on the railway network), a modally-specific approach can add value.
- **Challenges on strategic co-ordination of priorities within and between regional areas.** TfSE understands from its collaborative work with other STBs, that the specific priorities of each region are different, even if the overall outcomes and objectives contained within transport strategies may be somewhat similar.

Strategic regional transport planning has a chequered history in England. Even within the TfSE region, there are a variety of sub-regional approaches to policy making. A notable example being that of the Solent region, where through Solent Transport there have been a variety of successes in sub-regional policy making, including securing funding for [a Future Transport Zone](#).

This is equally the case for strategic planning between regional areas. There is currently no duty for regional areas to co-operate on strategic transport and planning matters, similar in the manner to which Local Planning Authorities have a statutory duty to co-operate. Regardless of

this, many STBs do collaborate on a number of thematic areas, including work on decarbonisation, freight, rural transport, electric vehicle charging infrastructure and lately on the the establishment of a series of regional centres of excellence.

- **Lack of co-ordination between strategic planning and the ability to deliver necessary changes.**

The delivery of strategic planning and priorities requires close partnership working between a variety of partners to enact significant changes. TfSE has successfully developed and adopted a number of thematic strategies and action plans through its Partnership Board, who have successfully worked together through consensus on securing the best possible deal for transport in the South East. This focus has been key in securing the progress that TfSE has to date. But this process has also showed how different priorities and understanding of issues can cause problems in delivery.

A notable recent example is that of decarbonisation. The STBs are working together to understand the decarbonisation potential of a variety of types of transport schemes and the data and approaches needed to understand this. However, even where there is consensus that decarbonisation should be achieved, this can be interpreted differently in different locations. For instance, within a larger urban area decarbonising transport can be understood to mean encouraging the use of active travel, whereas in another area the focus could be on encouraging the uptake of electric vehicles.

### **3. (Question 2). Should a new national transport strategy be developed for England or the UK as a whole?**

- *How would an overarching strategy strengthen decision-making, help meet the UK's long term objectives, improve infrastructure delivery and better the lives of the public?*
- *What specific issues and challenges should it address?*
- *How should a national transport strategy address connectivity between the UK's nations?*
- *How would a strategy for England be integrated with those of Scotland, Wales and Northern Ireland?*

3.1 TfSE would welcome the creation of a transport strategy for England. In common with Scotland's and Wales's national transport strategies this should not identify specific projects or interventions but provide a framework for making decisions to enable infrastructure interventions directly linked to the wider national outcomes being sought. This national strategy would provide the framework for the regional transport strategies and investment plans developed by STBs which would identify the interventions needed to address the specific challenges and opportunities in their areas.

3.2 The transport strategies and investment plans that have already been delivered by the STBs demonstrate the merits of a regional approach to transport planning. They have enabled the development coherent multi-modal transport strategies that serve the needs of the people business and places within their areas.

3.3 TfSE's Strategic Investment Plan is underpinned by a credible, evidence-based technical programme that has enabled TfSE and our partners to:

- understand the current and future challenges and opportunities in the south east;
- identify stakeholder priorities for their respective areas of interest;
- evaluate the impacts of a wide range of plausible scenarios on the south east's economy, society, and environment;
- develop multi-modal, crossboundary interventions;

- assess the impact of proposed interventions on transport and socio-economic outcomes; and
- prioritise the interventions that best address the south east’s most pressing challenges and unlock the south east’s most promising opportunities.

3.4 The STBs transport strategies and investment plans provide the ‘golden thread’ between national policy priorities and local transport plans developed by their constituent LTAs to ensure individual community needs are well understood and that projects at every scale complement each other, avoiding waste and duplication of effort.

3.5 There are a number of transport policy objectives and issues that are likely to be at the forefront of an English national transport strategy. A significant focus of policy making is on decarbonisation and issues of equality and fairness. We anticipate that it will be the role of the national transport strategy to articulate the meaning of these issues in a transport policy context to establish a common baseline of understanding of them across the regions of the UK. Additionally, it is likely that the economy will be a key policy priority. The strategic goals established for the TfSE transport strategy articulate some of the detail behind these policy areas:

<b>Environmental</b>	<b>Social</b>	<b>Economic</b>
<ul style="list-style-type: none"> <li>• Reducing carbon emission to net zero by 2050, at the latest.</li> <li>• Reducing the impact of, and the need to, travel.</li> <li>• Protecting our natural, built and historic environments.</li> <li>• Improving biodiversity.</li> <li>• Minimising resource and energy consumption.</li> </ul>	<ul style="list-style-type: none"> <li>• Promoting active travel and healthier lifestyles.</li> <li>• Improving air quality.</li> <li>• An affordable, accessible transport network that’s simpler to use.</li> <li>• A more integrated transport network where it is easier to plan and pay for door-to-door journeys.</li> <li>• A safer transport network</li> </ul>	<ul style="list-style-type: none"> <li>• Improving connectivity between major economic hubs, ports and airports.</li> <li>• More reliable journeys.</li> <li>• A more resilient network.</li> <li>• Better integrated land use and transport planning.</li> <li>• A digitally smart transport network.</li> </ul>

3.6 TfSE has no strong views on how this national strategy could be integrated with those of Scotland, Wales, and Northern Ireland. We would recommend, however, that this strategy carefully considers requirements for international connections by passengers and freight, and their importance to the English economy. This is especially the case for the TfSE area, which contains a number of major international gateways including Gatwick and Southampton Airports, as well as the major freight and passenger ports of Dover and Southampton.

**4. (Question 3). What role should different stakeholders play in delivering better transport outcomes in England (e.g. central government, subnational transport bodies, the National Infrastructure Commission)?**

4.1 TfSE is clear about the role that STBs should play in delivering better transport outcomes for regions in England. There are a number of benefits that STBs bring:

- Delivering local democratic accountability and speaking with one voice on behalf of their constituent authorities on transport investment requirements of their the regions;
- Developing regional evidence bases ensures that the differing needs and opportunities within each region are reflected in their transport strategies

- enabling Government to deepen the use of a programme approach in confirming the allocation of funds
- strengthening the linkage between plans prepared by LTAs and those developed/delivered by national infrastructure bodies such as Network Rail and National Highways;

4.2 In order so that such benefits are fully realised, and regional transport strategies are delivered effectively, it is important that further consideration is given to providing STBs the powers and duties as set out in the Cities and Local Devolution Act at the appropriate time. Currently, the only such STB is Transport for the North. . In July 2020 TfSE made an application to become a statutory body. Statutory status would provide us with the powers and responsibilities that will be needed to deliver our transport strategy and strategic investment plan. In outline, this would result in the following powers being bestowed upon TfSE;

- Become a statutory partner in road and rail investment decisions;
- Improve bus services for passengers and provide improved alternatives to car travel;
- Coordinate the delivery of region-wide integrated smart ticketing;
- Have role in the development and implementation of transport investment schemes;

Although the Government decided not to progress with our initial request for statutory status, our board and our partners remain clear that getting the right tools from government will be critical to delivering the south east's transport investment priorities. So, we will continue to work with government and the other STBs to identify the best time to put forward our case.

4.3 Should a national transport strategy be established providing a policy framework for regional multimodal transport strategies produced by statutory STBs, then these would provide the primary mechanism for identifying transport investment priorities across the country. This presents an opportunity to drive further efficiency in the system by allowing Network Rail and National Highways to focus on maintaining an effective and safe network with the strategic investment planning work undertaken by STBs. Under this proposal LTAs would continue to produce local transport plans setting out how the needs of local communities were to be met.

## 5. **(Question 5). What timeframe should a strategy cover and how often should it be reviewed?**

5.1 In determining the timeframe for any such strategy, any organisation responsible for developing and delivering the strategy needs to consider a number of factors. There are no 'hard and fast' rules for what constitutes an ideal length for a transport strategy. Notwithstanding that, we would recommend that the following be considered when setting a timescale for a national transport strategy:

- A sufficiently long time frame to address the challenges that the country faces with the urgency needed and achieve the desired outcomes of the transport strategy, reflecting periods of planning, construction, operation, and payback for transport investment.
- Established statutory guidance on transport infrastructure and service investment, including timescales to be considered for projects of varying scales.
- Known or estimated timescales by which transport-related issues are expected to become acute or urgent, for example carbon emissions.

5.2 We would recommend that, in line with best practice on policy and strategy development, that monitoring, evaluation, and reporting on progress be undertaken on a continual basis. This should also

be integrated into the mechanisms by which the transport strategy is delivered. A formal, comprehensive refresh of the transport strategy should be undertaken every 5 years.

## **6. (Question 5). How can a strategy be made resilient to political change?**

6.1 A necessary pre-condition of a strategy being resilient to political change is ensuring that it is based on a strong evidence base. Ensuring that the evidence base is sound and robust and using that to set clear vision and objectives means that it is easier to gain consensus on the current situation with regards to transport over a particular area. This makes the task of setting a clear vision and objectives that political stakeholders can sign up to much easier, and forms a good basis by which political leadership can be engaged in the strategy development process.

6.2 All of the STBs across England have extensive experience in engaging with political and other local stakeholders. Especially in the development of transport strategies that set a vision, objectives, and priorities for a region that have a significant degree of political support. This is often based on strong partnership working between the constituent authorities, often developed in the development of a transport strategy for the region. This is translating from the development of strategy into delivery plans for these regions.

6.3 Another necessity to securing ongoing political engagement is commitment to long term funding of projects. This gives a greater degree of certainty to STBs and local authorities that schemes that are in delivery plans – some of which may be suggested by political leaders – will be delivered. Short term funding arrangements make the delivery of transport schemes more prone to changes in political leadership, and increases the uncertainty that delivery plans and strategies will be successfully delivered. This makes the task of political engagement and securing ongoing political support for strategies more challenging.

6.4 Finally, ongoing political engagement is essential to securing ongoing support for transport strategies and their associated delivery plans. Cross-party consensus, on a National Transport Strategy is vital and there must be early engagement with other stakeholders and delivery partners. In this context, STBs can play an important role in gaining regional and local agreement on national transport policy objectives.

## **7. (Question 6). How can existing data be best used to improve transport outcomes – and what data gaps exist?**

7.1 Transport for the South East has identified a number of issues concerning data that are relevant to policy making more generally, as well as specific data gaps in specific thematic areas such as freight. It is our experience that, for many areas of transport, England and the UK is not lacking in data in terms of activity however data is often not openly available. Data is available on almost all aspects of transport operations – from amount of freight through major ports to reliability on trains. The challenge is linking such data to wider impacts in a way that supports decision making.

7.2 A notable challenge in policy making is the sharing of data between partners. In many areas there can be found good quality open data, such as National Highways Traffic Flow Data, but some data is more difficult to share for reasons of commercial confidentiality and data protection. There are means of navigating such issues, and many authorities publish good quality transport data openly, but this is far from standard practice.

7.3 To tackle the challenge of linking this data to wider impacts and outcomes in a manner that supports decision making, what is essential is that monitoring and evaluation is shared openly and in an accessible manner. This could be through a repository that supports business case development. This could be enabled by a national transport strategy (and potentially enable it) through the Department for Transport putting out a call for post-scheme monitoring and evaluation reports for different types of schemes, to publish openly.

7.4 A unique challenge is the validity of the Census 2021 Travel to Work statistics. The Travel to Work statistics are often considered as a key transport statistic for planning purposes. However, this data was collected during COVID-19, and its reliability is open to question. However, data from the 2011 Census is now 12 years old, and has similar such issues. Before applying Travel to Work data to a national transport strategy, guidance on the applicability of this data is urgently needed.

**8. (Question 7). What existing mechanisms and approaches could be used to achieve the desired integration if it proves impossible to get an integrated transport strategy off the ground?**

8.1 Transport for the South East's preferred option would be the development of a national transport strategy for England. However, should this not be possible to achieve, our recommended approach would be to consider making all Sub-National Transport bodies statutory bodies. This would enable such bodies to influence government decisions on transport issues, as well as giving the tools necessary to deliver against their respective transport strategies.

8.2 Associated with this, however, could be an expectation placed upon STBs to co-operate on strategic matters of common interest. STBs already undertake such activities through joint working on various thematic areas such as freight, rural mobility, decarbonisation, electric vehicle charging infrastructure and the establishment of Centres for Excellence. Placing a more formal duty on STBs for similar such activities could assist in integrating policy making and best practice across England.

**9. (Question 8). What lessons can be learnt from other countries with national transport strategies?**

9.1 The examples of the national transport strategies set out in the Green Paper serve to demonstrate the merits of a coherent, integrated outcome focussed, multimodal approach to transport planning that better serves the needs of the people and business using the transport system .



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