

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

Date of meeting: **30 October 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**

---

***RECOMMENDATIONS:***

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

- (1) **Govia Thameslink Railways (GTR) –  
Proposals launched to improve customer service and reflect how customers now buy tickets;**
  - (2) **National Highways –  
Route Strategy Overview Reports;**
  - (3) **National Highways –  
Connecting the Country;**
  - (4) **Transport Select Committee –  
Call for evidence: Does the Government have a joined up plan for investing in transport?;**
  - (5) **Transport Select Committee –  
Call for evidence: Future of transport data;**
  - (6) **Department for Transport (DfT) and Department for Levelling Up, Housing and Communities (DLUHC) –  
Call for evidence: Freight and logistics and the planning system;**
  - (7) **Portsmouth City Council – Draft parking strategy consultation;**
  - (8) **Portsmouth City Council, Travel Portsmouth – Draft EV infrastructure strategy consultation; and**
  - (9) **London Gatwick - Registration as interested party: application for a Development Consent Order (DCO), repositioning the centre line of the Northern Runway to allow dual runway operations, aligning with international safety standards.**
-

## 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:

- **Govia Thameslink Railways (GTR) – Proposals launched to improve customer service and reflect how customers now buy tickets**
- **National Highways - Route Strategy Overview Reports**
- **National Highways - Connecting the Country - our long-term strategic plan to 2050**
- **Transport Select Committee - Call for evidence: Does the Government have a joined up plan for investing in transport?**
- **Transport Select Committee - Call for evidence: Future of transport data**
- **Department for Transport (DfT) and Department for Levelling Up, Housing and Communities (DLUHC) - Call for evidence: Freight and logistics and the planning system**
- **Portsmouth City Council - Draft parking strategy consultation**
- **Portsmouth City Council, Travel Portsmouth - Draft EV infrastructure strategy consultation**
- **London Gatwick - Registration as interested party: application for a Development Consent Order (DCO), repositioning the centre line of the Northern Runway to allow dual runway operations, aligning with international safety standards.**

## 2. Govia Thameslink Railways (GTR) – Proposals launched to improve customer service and reflect how customers now buy tickets;

2.1 GTR, South Eastern, Great Western Railway and South West Trains invited stakeholders to respond to their consultation regarding specific proposals to close ticket offices at a number of railway stations in order to modernise the railway.

2.2 This consultation closed on 26 July 2023 and the officer level response that was submitted is summarised below and contained in Appendix 1.

2.3 TfSE's response noted a number of concerns about the ticket office closure proposals, the way they have been developed and the consultation process. The response also pointed to likely disadvantage of these proposals to significant numbers of people as evidenced; highlighting the impact this has on train of travel of certain groups and their access to employment opportunities, education, health and social facilities. TfSE notes that such proposals run counter to our 2050 vision that seek to enable all of our communities to thrive and live healthier, more productive and active lives.

2.4 TfSE highlighted that further engagement with those who are most likely to be adversely affected by the proposals needs to be undertaken and potential measure need to be identified to address the adverse impacts that are identified; outcomes of this work to then be included in a further public consultation exercise, with a longer duration, to ensure meaningful responses can be submitted.

## 3. National Highways - Route Strategy Overview Reports

3.1 Route strategies are a rolling programme setting out National Highways plan for the strategic road network (SRN). A stated key research element underpinning the Road Investment Strategy (RIS) which informs the process of future road investment, TfSE has responded through the RIS3 Route Strategies Online Feedback Form.

3.2 This consultation closed on 11 August 2023 and the officer level response that was submitted is summarised below and contained in Appendix 2.

3.3 Generally TfSE welcomed the contents of the strategies and their alignment with TfSE's own area studies and Strategic Investment Plan (SIP), TfSE makes a number of general observations:

- Highlighting the importance of National Highways developing a stable programme of work to ensure it can maximise the efficiency and effectiveness of its overall business.
- Expressing concern that the increase required for maintenance budgets stated in the documents may be funded to the detriment of major projects.
- Observing that small schemes will not necessarily deliver what is necessary (noting that severance has been an issue for decades and small interventions won't make the improvements required to meet government objectives for levelling up).

3.4 Feedback as provided in Appendix 1 of our response has been provided on Initial Overview Reports: Kent Corridors to M25, London Orbital to M23, London to Wales, Solent to Midlands, South Coast Central, South West Peninsula.

3.5 TfSE recognises being heavily involved in the process to this point in collaboration with National Highways, relationship significantly improved in the time between RIS2 and RIS3 and we are satisfied that we are aligned with National Highways.

#### **4. National Highways – Connecting the Country – our long-term strategic plan to 2050**

4.1 In reference to National Highways' stated vision of a long-term strategic plan to 2050 based on an analysis of available evidence to understand both historic and future trends, TfSE has welcomed the opportunity to comment on this Connecting the Country report.

4.2 This consultation closed on 11 August 2023 and the officer level response that was submitted is summarised below and contained in Appendix 3.

4.3 Observing that collaboration between TfSE and National Highways through this process has been positively received, TfSE further comments that the Connecting the Country report contains a lot of good work; TfSE looking forward to continuing to develop this collaborative working relationship with National Highways to ensure alignment of TfSE's strategy and SIP, and National Highways planning for the long term and RIS3.

## **5. Transport Select Committee – Does the Government have a joined up plan for investing in transport?**

5.1 Inspired by proposals that were pitched to the Committee during its *Our Future Transport* campaign, the Transport Committee launched a new inquiry to examine how the Government develops strategic objectives for transport policy, as well as how effectively the Government works across departments to set strategic transport objectives, and how these objectives do — or should — influence decisions on investment in services, networks and infrastructure.

5.2 This call for evidence closed on 11 August 2023 and the officer level response that was submitted is summarised below and contained in Appendix 4.

5.3 TfSE welcomed this inquiry to identify to what extent the Government takes a long-term, national and multi-modal approach, and what difference adoption of clear, national strategic objectives for transport could make, hoping responses to questions posed will provide value to the Committee.

5.4 TfSE recognises that standard practice in the development of objectives for new strategies is to undertake a review of existing policies to ensure compliance, proposing that a more lateral integration of policy objectives across government departments is required to ensure that policies are mutually beneficial to each other. Noted that enabling this in a manner that is useful to the setting of transport objectives requires new ways to develop policy that seek collaboration across government departments.

5.5 Reference is made to the provision of a policy and funding framework for the regional multimodal transport strategies produced by STBs, should an English national transport strategy and regional funding allocations be established; providing the primary mechanism for identifying and allocating funds to transport investment priorities across the country.

5.6 TfSE has pointed to the importance that further consideration be given to providing STBs the powers and duties as set out in the Transport Act (2008) at the appropriate time for benefits to be fully realised and ensure that regional transport strategies are delivered effectively. Noting that the only STB currently with statutory status is Transport for the North, suggested that statutory status would provide STBs with the powers and responsibilities that would be needed to fully deliver their transport strategies and strategic investment plans.

## **6. Transport Committee – Future of transport data**

6.1 As part of the Transport Committee's inquiry into the potential uses of data to improve planning and delivery of transport services, maintenance and management of transport assets, and helping transport users get around more quickly, efficiently and safely - it is asking where transport data will take us in the future.

6.2 This call for evidence closed on 25 August 2023 and the officer level response that was submitted is summarised below and contained in Appendix 5.

6.3 In reply to key exploratory questions in this call for evidence, TfSE has responded regarding greater use and sharing of transport data, as well as

anticipated benefits / consequences for specific stakeholders including the travelling public, local communities, freight sector and supply chain.

6.4 TfSE has responded to further questions looking at usage and condition of assets going forward, highlighting the importance of accuracy, completeness, consistency, validity, timeliness, uniqueness and modelling.

6.5 Following response to further key questions, TfSE has made recommendations regarding national tools for local transport authorities' use in the development of local transport plans etc to facilitate nationwide uniformity of format; also proposing workshops to ensure optimum data value, suggesting the centralisation of data to allow relevant sharing and comparison.

6.6 TfSE noted some identified barriers in the Transport Data Strategy, highlighting the lack of guidance on overcoming them, but did not have any comment to make in response to a final question on emerging best practice internationally in the development of standards and frameworks for transport data.

## **7. Department for Transport (DfT) and Department for Levelling Up, Housing and Communities (DLUHC) – Freight and logistics and the planning system**

7.1 In the context of *The Future of Freight: a long-term plan* that recognises the needs of the freight and logistics sector, DfT and DLUHC published a call for evidence seeking views so that the planning needs of the freight and logistics sector can be properly and effectively considered and empowering the relevant authority to plan for them.

7.2 It is intended that evidence helps underpin any new or amended planning policies that reflect the government's vision and expectations for local planning authorities in planning for freight, ensuring sufficient land is allocated to service the needs of freight and logistics. Responses were invited on what works well for planning freight and logistics, what does not work well and if there are improvements to be made; evidence sought in 3 areas in particular:

- local plan making and land availability
- planning decision taking and the applications process
- how the planning system can support specific policy priorities
- (to include supporting supply chains; decarbonisation of freight; HGV driver parking facilities and welfare; strengthening the Union).

7.3 This call for evidence closed on 06 October 2023 and the officer level response that was submitted is summarised below and contained in Appendix 6.

7.4 To inform TfSE's response on a number of questions of direct interest to local authorities (others relevant only to the freight and logistics sector), a workshop and number of detailed follow-up meetings with planning and transport officers from 12 partner authorities across the region were held with call for evidence questions at their core.

7.5 Detailed evidential responses were provided, along with suggestions and recommendations in relation to specific initiatives and anticipated guidance in this welcome opportunity to assist government understanding into where the planning system can appropriately support the freight and logistics sector, alongside the practical issues that arise within the system when planning the right infrastructure.

## **8. Portsmouth City Council – Draft parking strategy consultation**

8.1 Portsmouth City Council invited views from all on how to improve parking in Portsmouth, for everyone to have a say to help develop a strategy that works for them whether driving, walking, cycle, wheeling or taking public transport.

8.2 This invitation closes on 29<sup>th</sup> October and the officer level response that was submitted is summarised below and contained in Appendix 7.

8.3 Highlighting Portsmouth City Council (PCC) as one of TfSE's key partners, it has been noted that – in addition to having a representation on our Partnership Board – PCC has been engaged as a stakeholder throughout the development of TfSE's technical work programme, and will be key in helping TfSE to deliver the vision set out in our Transport Strategy and Strategic Investment Plan.

8.4 Welcoming the opportunity to comment on the Portsmouth draft parking strategy, we have confirmed that we welcome, in general the content and are happy to see the alignment with TfSE's work; happy to discuss any of the feedback in our response, as well as opportunities for further collaboration.

## **9. Portsmouth City Council, Travel Portsmouth – Draft EV Infrastructure strategy consultation**

9.1 As part of the Portsmouth City Council (PCC) aim to support residents in switching to using an electric vehicle, views have been invited from those considering an electric vehicle (EV) to help improve air quality in the city, as well as those who already have an EV to get around in a cleaner, greener way.

9.2 In addition, PCC in relation to businesses wants to implement more EV charging infrastructure, helping make journeys more reliable for those that have converted to electric vehicles for business and staff vehicles.

9.3 As part of PCC's vision to transform how everyone travels within the city and wider region, views will help shape PCC plans to create cleaner air for our city and improve the health of everyone who lives, works, visits and studies here.

9.4 This invitation closes on 29<sup>th</sup> October and the officer level response that was submitted is summarised below and contained in Appendix 8.

9.5 Welcoming this opportunity to comment, pointing to TfSE's own regional EVCI strategy for the South East published in spring 2023 and setting out its aims, our response highlights PCC's valuable constituent authority contribution to the development of TfSE's strategy, as well as its full involvement and ongoing support for the wider work of TfSE.

9.6 Particular and positive reference is made to specific stated objectives and policies of PCC's strategy evidence regarding future rollout of EV charging infrastructure; noted is alignment with those of TfSE's regional EVCI strategy, with its focus on the need for a regional collaborative approach that aims to improve the rollout of EV charging infrastructure across the south east.

9.7 Referring also to PCC's consideration of fleet vehicle needs when planning for future EV charging infrastructure rollout (key objective of TfSE's regional EVCI strategy), TfSE welcomed continuing PCC support in development of this work to ensure continuation of aligned thinking. Noted is TfSE recent work on development of a methodology for projection of fleet EV uptake and associated charging demand that will emerge from public sites and depots.

9.8 Concluding that TfSE endorses PCC's collaborative approach with the development of this strategy, we note openness to discuss any opportunities for further collaboration and sharing of data to our mutual benefit.

## **10. London Gatwick - Registration as interested party: application for a Development Consent Order (DCO), repositioning the centre line of the Northern Runway to allow dual runway operations, aligning with international safety standards.**

10.1 Gatwick Airport Limited (GAL) has invited registrations of interest on their application for a Development Consent Order (DCO), repositioning the centre line of the Northern Runway 12 metres north to allow dual runway operations, aligning with international safety standards, anticipated that construction could start in 2025, completed and ready for operational use by the end of the decade and contributing to the unlocking of new capacity while allowing for a more efficient and resilient operation.

10.2 This invitation closes on 29<sup>th</sup> October and the officer level response that was submitted is summarised below and contained in Appendix 9.

10.3 TfSE is registering as an interested party in relation to the surface access elements of this application by GAL for an additional northern runway, noting that the proposed expansion of Gatwick Airport will have significant impacts on the transport system in and around Gatwick Airport and that these impacts must be addressed as part of the project.

10.4 Acknowledging that many of the identified improvements in the surface access strategy are already planned and committed in National Highways and Network Rail's investment programmes, specific reference has been made to a number of these, with further detail on a number of aspects.

10.5 Reference is made to addressing approaching traffic from the surrounding road network into the A23/M23 corridor, noting concerns that provision of safe and suitable access has not been demonstrated.

10.6 Further, support is expressed for West Sussex County Council (WSCC) request for evidence to support the potential impact of the speed limit reduction proposed on London Road (A23) to 40mph.

10.7 Noting that changes to highway proposals were made following GAL's Autumn 2021 consultation, changes do not however appear to have incorporated sufficient additional measures to make sustainable modes of travel more attractive to staff and passengers.

10.8 TfSE has commented on GAL's commitments on percentage ambition for passenger journeys being made by public transport, noting that the majority of journeys to and from Gatwick are made by car; proposing that GAL honours its commitments including the provision of new bus services, Improved bus connections will enable longer distance inter-urban journeys.

10.9 Also needed is a commitment to increase the attractiveness of alternate modes; an undertaking for ongoing liaison with all public transport operators increasing understanding of travel behaviour and how it could be changed in the future.

10.10 Additional freight movements, as a result of the Northern runway, should also be considered not just within the airport boundary but in the surrounding area. Driver welfare and parking facilities should be provided or made provision for in the vicinity of Gatwick to avoid any adverse effect on surrounding local roads.

10.11 Finally recommended is that the delivery of the scheme and plans for surface access must maintain a consideration of government targets for decarbonisation and how they will contribute to achieving net zero aspirations for 2050.

## **2. Conclusion and recommendations**

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

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

Contact Officer: Elan Morgan  
Tel. No. 07849 308518  
Email: [elan.morgan@eastsussex.gov.uk](mailto:elan.morgan@eastsussex.gov.uk)



Sent by e-mail to:

[Ticketoffice.GWR@transportfocus.org.uk](mailto:Ticketoffice.GWR@transportfocus.org.uk)

[Ticketoffice.GTR@transportfocus.org.uk](mailto:Ticketoffice.GTR@transportfocus.org.uk)

[Ticketoffice.SWT@transportfocus.org.uk](mailto:Ticketoffice.SWT@transportfocus.org.uk)

[Southeastern.Consultation@Londontravelwatch.org.uk](mailto:Southeastern.Consultation@Londontravelwatch.org.uk)

[Southern.Consultation@Londontravelwatch.org.uk](mailto:Southern.Consultation@Londontravelwatch.org.uk)

[GNTL.Consultation@Londontravelwatch.org.uk](mailto:GNTL.Consultation@Londontravelwatch.org.uk)

25 July 2023

To whom it may concern

**Transport for the South East (TfSE) response to the Govia Thameslink Railway, South Eastern, Great Western Railway and South West Trains consultation regarding proposals to close ticket offices at a number of railway stations.**

I am writing to you in my role as lead officer for Transport for the South East (TfSE) in response to the consultation from Govia Thameslink Railway, South Eastern, Great Western Railway and South West Trains consultation on proposals to close ticket offices at a number of railway stations.

TfSE is a sub-national transport body (STB) that 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's transport strategy was agreed in July 2020. It sets out a vision for 2050 for developing the transport system in the South East to facilitate sustainable economic growth and reach net zero carbon emissions by 2050 at the latest. We recently published Strategic Investment Plan (SIP) which sets out a compelling case for future transport investment in the region to create a more productive, healthier, happier, and more sustainable south east. We submitted the SIP to Government in March 2023 and have received written assurance that Ministers will have due regard to it when making future policy and investment decisions.

Both the transport strategy and the SIP are aligned with government priorities to facilitate sustainable economic growth, decarbonise the transport system, reduce congestion, level-up left-behind communities and improve public health outcomes. To deliver these outcomes, there is a need for more joined up planning, particularly between local and national transport delivery bodies, including train operators, to enable communities to thrive and live healthier,

more productive and active lives. Throughout both documents, there is a recognised need to reduce private car travel by facilitating modal shift to more sustainable and accessible alternative travel options, including rail. The continued ability of all people to have easy access to stations, tickets, and trains will be critical to achieve this.

We have a number of concerns about the ticket office closure proposals, the way they have been developed and the consultation process. Firstly, a three-week consultation period is insufficient on an issue that is likely to have a major impact on a significant number of people, particularly those from a number of disadvantaged groups, including elderly and disabled people. This very short consultation period has not provided sufficient time to properly consider and respond to these far-reaching proposals. In addition, there has not been any meaningful engagement with the groups who are likely to be affected by them during their development.

It is understood that the train operating companies are carrying out Equality Impact Assessments for the stations where they are proposing to make changes and, as part of that work, they will speak to stakeholder groups. However the final assessment will not be made available until after the consultation process has finished. However, in order to provide meaningful responses to the consultation, those responding need to be able to understand the potential impacts of the proposals on customers, particularly disabled people and older people, and any proposed mitigation measures.

There is clear evidence that a significant number of people are likely to be disadvantaged by the proposals. Not everyone would be able to use the alternative methods of booking tickets, set out in the consultation documents. For example, [19% of disabled adults and 46% of those aged 75 and over in 2020](#) do not use the internet, and only [78% of UK adults owned a smart phone in 2021](#). Many find telephones and ticket machines difficult to use. This is due to a number of reasons including age, visual, hearing, physical, mental, social/behavioural, memory and learning disabilities. Many with these disabilities rely on familiarity with location, process and people, and many also find it easier to have face-to-face interaction with people with whom they are familiar.

The proposed additional requirement to first arrange a meeting at the station with an unknown person in order to get the assistance required would cause additional inconvenience, stress and further disadvantage to those who are less mobile or have disabilities that would further limit their access to the rail network.

Planning journeys on the railway is already more difficult for those with disabilities and can take a lot of preparation. This is part of the reason why such a small proportion of disabled people use the train. Not all users are able to plan ahead sufficiently to call ahead to arrange for a 'travel assistant' to meet them, or find one when they arrive, so that they can discuss their journey and then use the current ticket machines, not all of which are always accessible to all those with disabilities. 'Travel assistants' who 'roam' around the station will not necessarily be a suitable and accessible alternative for many disabled people with mobility impairments, who cannot always move through the station to try and find

assistance. Blind and visually impaired users may struggle to identify a member of staff.

Ticket offices are often the only designated point in the station with a hearing induction loop. These cannot be operated by individual members of staff 'roaming' around the station. Therefore, many people who are hard of hearing may be unable to access the assistance they need. We do recognise that additional training may be given to the 'travel assistants' but there is no alternative to induction loops, and signing. There is also a concern that not enough assistants will be available at off-peak times.

When 'travel assistants' are unavailable it is likely that any user who needs help will need to use a designated Help Point. However, it is unclear how much information about ticketing will be available via this system, particularly as these are currently more often used by those seeking train and station information, physical accessibility requests or problems when exiting the station when stations are unstaffed.

If a 'travel assistant' is not available then travellers will have to use ticket machines. However, these are not always accessible to those with disabilities. This is either because: their position is not easily accessible; they are at the wrong height; lack tactile information and functionality; they are not sufficiently well lit; or are just too complicated for some users to follow. This can lead to additional stress for older or disabled people, particularly when they are 'under pressure' if there are others waiting to use the machine behind them.

There is also the issue of ticket machine availability, it is unclear how many new ticket machines will be installed in stations where there is no functioning ticket office' to ensure that people will be able to buy tickets in time for their train.

Ticket machines and websites are not always capable of recognising different discount options e.g. an easitNetwork card, nor are they able to identify the cheapest routes for different, non-standard journeys or to give multiple options depending on the needs of the user. Even if the options to make multiple enquiries was easily available, the user would then have to make notes of each so that they could then make an informed decision.

The current limitations of websites and ticket machines, and the difficulties that many users have in using them, are likely to result in more expensive journeys. This is because there will be insufficient information or time available for many users to identify and investigate all the options that would have been identified previously by a member of staff at a ticket office. This is more of an issue now as an increasing number of the journeys being made are not 'standard journeys' such as peak time, work related journeys or off-peak returns that that would have been covered previously by season or standard day-return tickets. This can be a major concern for many, not just those who are older or have disabilities but also those who are economically disadvantaged.

The focus of the consultation on ticket office staffing seems to have been considered in isolation and in advance of other wider ticket related developments, such as smart or pay as you go (PAYG) ticketing. It is unclear how these options could be incorporated into current ticket machines. How would these methods of ticketing be made available via ticket machines for those who are disadvantaged and less able to use them or those who do not own mobile phones to act as portable ticket devices? It is also unclear how various discount schemes can be incorporated into PAYG or smart ticketing options, even if these were available without mobile phones.

While we recognise that there will be no new unstaffed stations, we are concerned that the numbers of staff available to maintain a suitable level of accessibility, safety and security for all users will be adversely affected by those staff having to deal with ticket related enquiries rather than be available for helping users access platforms and trains or helping those that require emergency assistance.

The net impact of these proposals is likely to mean that certain groups of travellers will be less likely to travel by train than they do now, further reducing their access to employment opportunities, education, health and social facilities. As such, these proposals run counter to our 2050 vision that seek to enable all of our communities to thrive and live healthier, more productive and active lives.

We recognise that following the Covid 19 pandemic, many people are making changes to the way they purchase tickets and organise their journeys. However the focus needs to be on recovering revenue by encouraging people back to the railway, rather than introducing measures that may dissuade them from doing so. Before moving any further forward with these proposals there needs to be more thorough engagement with representatives from those groups who are more likely to be affected by them. The outcomes of that engagement and any modifications that have been introduced in response should then be made available as part of a further consultation exercise with all stakeholders.

In summary, the proposals set out in the consultation documentation, would disadvantage a number of users, particularly the elderly and disabled. They would run the risk of discouraging use of the railway at a time when the focus needs to be on increasing patronage. Further engagement with those who are most likely to be adversely affected by the proposals needs to be undertaken and potential measure need to be identified to address the adverse impacts that are identified. The outcomes of this work should then be included in a further public consultation exercise, with a longer duration, to ensure meaningful response can be submitted.

This is an officer response. The TfSE Partnership Board next meets on 30 October 2023 when it will consider this response. A further iteration of it may therefore follow.

Yours sincerely



**Rupert Clubb**  
Lead officer, Transport for the South East



**0300 3309474**

**[tfse@eastsussex.gov.uk](mailto:tfse@eastsussex.gov.uk)**

**[transportforthesoutheast.org.uk](http://transportforthesoutheast.org.uk)**

Transport for the South East, County Hall,  
St. Anne's Crescent, Lewes, BN7 1UE

# RIS3 Route Strategies Online Feedback Form

## Introduction

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, National Highways, 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.

In 2020, TfSE published a thirty-year transport strategy for the south east that sets out an ambitious 2050 vision for the area. We undertook a programme of area studies to identify multimodal packages of interventions that will be needed to deliver the transport strategy. The outputs from the area studies have been brought together in a Strategic Investment Plan (SIP) that was published in March 2023.

National Highways are one of our key partners and are represented on our Partnership Board, as well as having been engaged as stakeholders throughout the development of our technical work programme and SIP. National Highways will be key in helping us to deliver the vision set out in our Transport Strategy and SIP.

TfSE have been actively engaged with National Highways as RIS3 and the Route Strategies have been developed collaboratively and we look forward to continuing our close work with you. We welcome the opportunity to comment on the final Route Strategies to ensure that regional priorities are reflected within the Initial Overview reports. In general, we welcome the contents of the strategies and their alignment with our own area studies and SIP, however in responding we would make a number of general observations.

It is vital that National Highways develops a stable programme of work to ensure it can maximise the efficiency and effectiveness of its overall business. It is clear that a number of lessons have been learned from RIS2 that will need to be put into practice in RIS3 to ensure a stable programme is in place.

It is important the objectives set for RIS3 align with the agreed outcomes for the south east as set out in the Transport Strategy and SIP. Delivery strategies should 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.

**0300 3309474**

**[tfse@eastsussex.gov.uk](mailto:tfse@eastsussex.gov.uk)**

**[transportforthesoutheast.org.uk](http://transportforthesoutheast.org.uk)**

Transport for the South East, County Hall,  
St. Anne's Crescent, Lewes, BN7 1UE



Consideration of impacts and issues on the MRN and local roads should be made when planning for investment as part of a more holistic approach. Consideration of using the Strategic Road Network (SRN) funding to improve MRN and local roads for the benefit of the SRN should be given equal consideration.

Through completion of area studies, TfSE have demonstrated that several parts of the south east's highway network suffer from regular congestion, undermining the productivity of the economy. Gaps in the SRN place communities at a structural disadvantage – including coastal communities that are already among the least prosperous in England.

There are several areas in the south east where long-distance connectivity is “funnelled” through a single lane highway, with few viable alternatives for motorists caught up in disruption.

The south east serves several of the busiest ports and airports in the UK. While generally well connected, there are challenges with managing disruption on some corridors.

We do have concern that the increase required for maintenance budgets stated in the documents may be funded to the detriment of major projects. As evidenced in the TfSE Transport strategy and SIP, these schemes support the government's policies of economic growth, levelling up and facilitate a move to net zero through improved transport choices.

The RIS2 tail has created pressure on the RIS3 envelope, it appears headroom for new schemes is limited and there has been discussions over the importance of the need to prioritise from DfT through the engagement process of RIS3. It appears that small schemes that make a “real difference to users and business” are likely to get greatest traction and that more ambitious schemes will need to wait for RIS4.

We are concerned that small schemes won't necessarily deliver what is necessary. Severance has been an issue for decades and small interventions won't make the improvements required to meet government objectives for levelling up. If we really want to make change there is a need to grasp the problem and look at more ambitious solutions as investments without which there will be an inability to meet targets set by government.

Our responses to the consultation questions from the online form can be found in appendix 1. Due to six of the Route Strategies being relevant to TfSE we are responding once in a single document. National Highways questions are stated and referenced by relevant number in bold throughout the appendix. Answers specific to individual Route Strategies are highlighted as such within the answers.

We look forward to working together with the DfT and National Highways through the next stage in the development of RIS3, and we would be happy to discuss any opportunities for further collaboration to ensure that our strategy and SIP, and RIS3 are aligned.

This is an officer response. The TfSE Partnership Board next meets on 30 October 2023 when it will consider this response. A further iteration of it may follow that meeting.

Yours sincerely

Rupert Clubb  
Lead Officer  
Transport for the South East

0300 3309474

[tfse@eastsussex.gov.uk](mailto:tfse@eastsussex.gov.uk)

[transportforthesoutheast.org.uk](https://transportforthesoutheast.org.uk)

Transport for the South East, County Hall,  
St. Anne's Crescent, Lewes, BN7 1UE





## Appendix 1

### **1. Please tell us about you. Are you responding as an individual or on behalf of an organisation?**

On behalf of an Organisation - Go to question 8-10 and then question 11 onwards

### **8. What is your Organisation's Name? Please supply your Organisation's name in full.**

Transport for the South East

### **9. If you are responding on behalf of an Organisation, please indicate which type of Organisation. Please select ONE that best applies or choose Other Organisation.**

Sub-National Transport Body

### **10. If you are responding on behalf of an organisation, please would you provide your contact details so that we may update our contacts database for future communications regarding Route Strategies?**

Mat Jasper  
Scheme Development Manager  
Mat.jasper@eastsussex.gov.uk

### **11. Which Initial Overview Report are you looking to provide feedback on?**

- Kent Corridors to M25
- London Orbital to M23
- London to Wales
- Solent to Midlands
- South Coast Central
- South West Peninsula

### **12. Please provide general comments on the selected route. For example: How well does this Initial Overview Report identify the challenges? How well does it map out a way forward?**

#### ***In reference to all 6 route strategies in the TfSE Area***

The challenges and way forward are generally aligned with those of TfSE as a result of our collaboration with National Highways through the Route Strategies process. TfSE welcome the opportunity to continue to work with National Highways to ensure that our priorities continue to align through the delivery period.

### **13. What specific comments would you like us to consider in relation to Chapter (1) Introduction?**

#### *In reference to all 6 route strategies in the TfSE Area*

Overall, the document is well aligned with TfSE, our Strategy and our Strategic Investment Plan (SIP).

We support that you are exploring how to support customers' end-to-end journeys by creating travel choices that aim to deliver net zero carbon customer journeys by 2050 and National Highways role in supporting an integrated transport network that allows current and future customers to re-route, re-time, re mode and reduce their journeys.

The confirmation of STB inclusion alongside LTA's and devolved authorities noted as part of your engagement is welcomed.

We welcome the recognition of the needs of customers and neighbours and an approach to be widely accessible and integrated with the rest of the transport system where it benefits the SRN. Highways interventions remain necessary to deliver a multi modal strategy, as they can unlock mass transit, active travel routes and improve safety. Further information on the context for multi modal highways were included in TfSE's highways thematic plan.

The strategic priorities set out in the Introduction align with TfSE's. Our vision as stated in our transport strategy is that 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.

There is a statement in the introduction giving clarity that the document does not "Identify committed schemes for delivery as part of future RIS periods. This will be part of the wider RIS setting process ". There is also a statement that "Following the setting of RIS1 and RIS2, which covered the first road period (2015-2020) and second road period (2020 2025), we are now in our third round of route strategy planning informing RIS3 for the third road period (2025-2030) and beyond". Some clarification around the move of incomplete schemes in RIS2 which now form the schemes for delivery in Road period 3 would be of benefit here. There are no RIS3 schemes named as "RIS3" in any of the route strategies. There are only RIS2 schemes stated to be completed in Road Period 3 but they are still listed as RIS2 schemes in Chapter 7. The RIS2 schemes are followed by RIS4 pipeline schemes without logical explanation for lack of anything noted as RIS3. This could cause confusion without more explicit clarification because what the document sets out in the chapters between is therefore more relevant to RIS4 pipeline schemes rather than RIS3 (of which there are none and they are already committed but not guaranteed).

We support the improved environmental outcomes and introduction of PAS 2080 as guidance. We recommend the addition of text to explain that the hierarchy

0300 3309474

[tfse@eastsussex.gov.uk](mailto:tfse@eastsussex.gov.uk)

[transportforthesoutheast.org.uk](http://transportforthesoutheast.org.uk)

Transport for the South East, County Hall,  
St. Anne's Crescent, Lewes, BN7 1UE



quoted is an assessment tool which does not “favour” not undertaking construction but to ensure that specified objectives of a scheme cannot be met without construction at the early option assessment stage. We would encourage this to be clarified in order that the document is not used out of context.

We agree that the SRN is an important economic corridor for the south east, and better connectivity will support the government's levelling up programme.

Digital roads - we welcome the increase in data collection and would like to have access as we begin to monitor and evaluate the success of the SIPs interventions.

## **14. What specific comments would you like us to consider in relation to Chapter (2) The Route?**

### ***South Coast central***

The issues set out in the route chapter align with TfSE's. We welcome the recognition of the A27 being notable as the only element of the SRN running east – west to the south of the M25.

The southern section of the A21 is the least developed part of the SRN in the region.

The A259 and A2070 are often narrow and traverse several sharp turns and level crossings. Their route passes directly through the centres of Hastings and Bexhill, negatively impacting vulnerable road users and contributing to high levels of congestion in the area.

The A27/A259/A2070 corridor contains some of the most deprived wards in the South East, including Brighton, Eastbourne, Hastings and Bexhill. Median earnings are also markedly lower than the regional average. This is likely to be due in part to gaps in connectivity and remoteness from more prosperous parts of the South East.

The highway is of variable quality, passing through urban areas and flat junctions with some sections of single carriageway. Congestion is particularly acute on parts of the M27 around Southampton, and the A27 at Chichester, Lancing and Worthing. There is a lot of interaction and conflict between different types of road users and local and regional traffic.

An Air Quality Management Area (AQMA) is in place on the A27 at Lancing and Worthing. Further AQMAs are in place in urban areas including Southampton, Portsmouth and Brighton.

### ***Kent Corridors***

TfSE welcome the highlighting of Operation Brock and the Dover Traffic Access Protocol (TAP) in the chapter when highlighting the route to the channel ports. We would like to see some more highlighting of the importance of and issues around freight and facilities for Lorry drivers along this route.

We also welcome the recognition of high levels of planned housing and employment development within the region but note the absence of Medway

towns where there is an existing issue regarding housing and stress on the M2 J1. There is significant out-commuting from the Medway Towns due to an imbalance of housing and jobs in the area, putting pressure on the wider transport network, with significant further housing development planned.

Maidstone is a road congestion bottleneck in the centre of the corridor, particularly during the AM peak.

### ***Solent to Midlands***

TfSE Welcome the recognition of this route as a strategic route connecting the Solent Ports to the manufacturing areas of the Midlands, and that it sees a higher-than-average volume of freight.

There is a notable cluster of historic road traffic incidents on the corridor around the A34/A303 junction, including incidents resulting in people being killed or seriously injured.

Congestion hotspot just outside Winchester on approach to junction 9 of the M3. This junction forms the southern end of the A34.

### ***London Orbital and M23***

The M25 is the busiest road corridor in the South East. This comes with significant areas of congestion, particularly along the south-west quadrant of the M25, as well as around Oxted and further east near the Dartford Crossing.

There are road safety issues on the corridor around the Dartford Crossing. There are clusters of historic road traffic incidents in this area, including incidents resulting in people being killed or seriously injured.

There is a notable concentration of deprivation in the Dartford area.

### ***South West Peninsula***

There are several road traffic congestion hotspots on the M3, M27 corridor. These include the M3 between Winchester and Southampton, the M3 between Fleet and the M25, and some of the access roads and junctions between the M3 and the Port of Southampton (i.e., the M27, M271, A33 and A326). This congestion slows down freight movements on the corridor and has the potential to worsen as the Port of Southampton expands.

There are clusters of historic road traffic incidents on the corridor where it enters Southampton, particularly on and around the M271 and A33, including incidents resulting in people being killed or seriously injured.

There is a significant imbalance in the development of jobs and homes along this corridor. Housing development is focused on Basingstoke, while employment growth is more concentrated in Southampton.



### ***London to Wales***

We recognise the importance of the tech industry noted in the Route Strategy but there is significant socioeconomic disparity along the corridor, with several pockets of deprivation in Reading and Slough.

There are some road traffic congestion hotspots on the corridor. These are between junction 4b and junction 6 of the M4 around Slough as well as between junction 10 and junction 12 of the M4 around Reading. There are also wider problems with road safety and air quality on the M4, particularly between Reading and the M25. The proposed expansion of Heathrow Airport could add additional pressure to the highway network.

## **15. What specific comments would you like us to consider in relation to Chapter (3) Engagement with Customers and Neighbours?**

### ***In reference to all 6 route strategies in the TfSE Area.***

We welcome the mention of TfSE alongside the major stakeholders in the first paragraph.

We would like consideration of changing the sentence “Improve safety through appropriate integration of local and strategic traffic” rather than integration of local and strategic traffic we would like to see targeted, integrated interventions to deliver high quality connections for freight, private and mass transit vehicles (notably, buses) that de-conflict local and longer-distance traffic supported by public transport.

## **16. What specific comments would you like us to consider in relation to Chapter (4) Network Integration?**

### ***In reference to all 6 route strategies in the TfSE Area.***

We welcome the affirmation that the SRN forms part of a transport network and does not exist in isolation. The commitment to joint early planning of outside interventions which will ultimately improve the SRN bringing increased value for money and improved customer experience.

We are grateful to the priority from DfT as part of RIS2 that allowed National Highways and STBs to come together to collaborate and develop an engagement framework. This has led to priorities, schemes, interventions, and data that increases to align and work cohesively together. The result of our collaboration is visibly present throughout the Route Strategies.

We welcome the inclusion of the TfSE Transport Strategy within this section but would also like to request mention of our SIP.

## **17. What specific comments would you like us to consider in relation to Chapter (5) Challenges and Issues?**

### ***In reference to all 6 route strategies in the TfSE Area.***

We would like the phrase “emerging thinking from Transport for the South East (TfSE) area studies” updated as we have now completed and published our SIP following the area studies work.

We welcome the use of iRAP to assess and identify areas for safety improvement across the region and the country. This is a leading data led method of assessing safety issues and we support its use for prioritising improvements.

We welcome National Highway’s recognition of the environmental challenges. The detail in the Initial Report sets out the basis for a progressive and industry leading way forward to address carbon reduction in the highways sector. We agree that across the 6 route strategies in the south east you have identified the local issues and environmental constraints.

We welcome the improvements and enhancements to the SRN to improve air quality in local areas. We can confirm that the areas identified for air quality align with our own locations from our area studies and go into greater detail setting out the impact on receptors at both 100 and 300m.

We are pleased that the local plans have been used to shape the RIS3, and housing developments have been considered when planning for the SRN to alleviate local congestions. Taking note of increased pressures on the network as a result of housing targets.

We are pleased to see the inclusion of areas identified as priority for levelling up.

### ***South Coast Central***

We agree that the issues highlighted are aligned with our own findings and that much of the SRN within this route is below the grade required to perform its strategic function properly. The many single lane pinch points are a particular issue requiring difficult resolution considering it is the only east-west strategic road south of the M25.

We welcome National Highways recognition of the need to consider better integration with other transport modes and how to support the transition to electric cars and zero carbon heavy goods vehicles (HGVs). We would like to see support for mass transit and public transport on the SRN quoted here in more detail.

We are happy to see the TfSE area studies referenced in recognition of the need for the A27 to provide a high-quality link for communities between the Solent region and Brighton. It would be nice to see the SIP referenced here as it has now been published and contains schemes identified to improve this.

We accept that there is limited technology provision within the South Coast Central route as most roads are A-Roads of varying consistency, and do not meet motorway standards. This does highlight the lack of appropriate SRN in the region as mentioned above and reinforces our view of the need to invest in the schemes set out in the SIP such as a long-term solution at Worthing and Guildford.

### ***Solent to Midlands***

The areas identified for safety improvements align with those outlined in our SIP from our area studies.

Network performance is aligned with TfSE's understanding and we are pleased that the SIP is reflected in the key challenges flagged within network performance. Our Solent and Sussex coast chapter in the SIP sets out 9 packages that significantly reduce congestion. The packages note the Southampton access to the M27 via Junction 2 and 3 (RIS4 pipeline) and are supported by a complement of other TfSE schemes. There is further alignment to network improvements within our Wessex Thames packages.

We welcome the recognition of the status of both Portsmouth and Southampton's economic importance and levels of deprivation.

### ***Kent to M25***

Network performance is aligned with our SIP and we are pleased to see both Brenley corner and Bluebell Hill referenced but it would be good to highlight their increased importance due to LTC along with any other relevant areas of concern that have been highlighted as part of National Highways modelling of the scheme. So as to ensure that LTC's opening is a success and not passing a problem onto another part of the SRN or the local road network. We are also pleased to see mention of improvements from the Housing Infrastructure Fund (HIF).

We welcome the inclusion of the Kent County Council Bus Service Improvement Plan (BSIP) which highlights a vision to improve public transport choices and encourage more travel to school by bus, which will help reduce congestion. The plan identified initiatives to embed the 'mobility as a service' concept as part of future provision in the county. We are also happy to see the consideration of rail for freight and its ability to support the ports in the Kent corridor.

We welcome the recognition of the route's importance supporting trade and freight both nationally and internationally.

We welcome identification of the housing pressures that has been included. There are currently specific issues due to a lack of alignment between house building targets and the infrastructure to support them (M2 Junction 1 as an example). Some recognition of the problem facing both local authorities' and National Highways in delivering on policy without sufficient funding would be beneficial to make the case for investment through one department or the other. This is touched on in the paragraph highlighting the expected population growth of over 16% by 2031 which could be considered an understatement that this will exacerbate pressure on the route and whether this considers the possibility of completing the housing growth plans based on capacity issues along this route.

### ***London Orbital***

We agree that it is a priority to consider and resolve the delays and congestion in the south west quadrant of the M25, the M23 and A23, and the A2 near Dartford.

### ***South West Peninsula***

There are considerable key congestion areas highlighted in this region by TfSE's area studies. This is despite most of the Route Strategy being outside of the TfSE area. Some of the key congestion areas highlighted from our corridor studies are:

- The M3 between Winchester and Southampton.
- The M3 between Fleet and the M25.
- Some of the access roads and junctions between the M3 and the Port of Southampton (i.e., the M27, M271, A33 and A326). This congestion slows down freight movements on the corridor and has the potential to worsen as the Port of Southampton expands."
- Where the A33 intersects the M4, as well as more moderate congestion along several stretches of the A33 between Swallowfield and Basingstoke."
- Just outside Winchester on approach to junction 9 of the M3. This junction forms the southern end of the A34.
- Where the A36 intersects the A3090 and M27.
- Between junction 4b and junction 6 of the M4 around Slough.
- Between junction 10 and junction 12 of the M4 around Reading.
- The A31 at Ringwood.
- Parts of the M27 around Southampton.
- The A27 at Chichester, Lancing and Worthing where there is a lot of interaction and conflict between different types of road users and local and regional traffic.

We welcome the recognition of areas that are expected to experience major economic growth. Southampton in particular with the expansion of the Port of Southampton and a potential runway expansion at Southampton Airport.

### ***London to Wales***

We welcome recognition of the air quality issues along the M4.

## **18. What general comments would you like us to consider in relation to Chapter (6) Initial Route Objectives?**

### ***In reference to all 6 route strategies in the TfSE Area***

TfSE have been heavily involved in the process to this point in collaboration with National Highways. Our relationship has improved significantly in the time between RIS2 and RIS3 and we are satisfied that we are aligned with National Highways. We welcome the reference to our transport strategy and reference to TfSE in Table 2: Evidence used to inform objectives under Integration with our partners' strategies and priorities.

We agree with the context, considerations and required outcomes. The objectives are aligned with TfSE's as a result of the level of engagement National Highways have undertaken with TfSE in the development process.

0300 3309474

[tfse@eastsussex.gov.uk](mailto:tfse@eastsussex.gov.uk)

[transportforthesoutheast.org.uk](http://transportforthesoutheast.org.uk)

Transport for the South East, County Hall,  
St. Anne's Crescent, Lewes, BN7 1UE





We would like to see SMART objectives in this section rather than those provided which “support” or “maximise opportunities”. However, we do appreciate this may not be possible without an understanding of the funding available for the RIS3 period.

We welcome the assertion that route objectives do not represent a commitment to road-based interventions but are intended to enable multimodal interventions to be explored as part of later study phases. Clarification over National Highways’ willingness to invest in “off network” solutions to improve performance/functionality of the SRN would be beneficial.

We welcome the integration with our partners strategies and priorities inclusion within the objectives table. It clearly shows National Highways’ route to alignment and shared visions.

Overall, the route objectives in each of the route strategies are a solid logical progression from the previous challenges and issues chapter.

## **19. If you have any specific feedback on any of the objectives for the Route, please provide them below.**

### ***South Coast Central***

We agree that the strategic function of the route is impeded by traffic congestion which undermines its strategic function resulting in reliability issues and delays. This contributes to the creation of local noise, air-quality and environmental impacts, as well as severance issues for local communities, which undermines opportunities for active travel and some public transport alternatives.

We agree with the identified areas of congestion and the impacts on the strategic function of the SRN in linking local communities and in enabling improved accessibility for customers.

We agree with the identified areas affected by poor air quality issues. We also recognise the constraint to the network as it passes through sensitive assets including the South Downs National Park, the A3 adjacent to the Surrey Hills AONB and the A21 running through the High Weald AONB. We appreciate the difficulty this can impose in developing any proposed interventions. But we also wish to highlight the detriment that congestion can have on the natural environment. Finding solutions may be difficult but the objectives should not be dismissed because they are difficult.

We welcome the recognition of emerging thinking from TfSE area studies and SIP consultation which identified that the A27 / M27 should provide a consistent high-quality route linking the two major conurbations in the Solent area and Sussex Coast (Worthing – Eastbourne), with travel being better supplemented by high quality public transport.

We accept that there is limited technology provision within the South Coast Central route as most of the SRN is made up of A-Roads, of varying consistency, and do not

meet motorway standards. This does highlight the lack of appropriate SRN in the region and stresses the need to invest in the schemes set out in the SIP such as long-term solutions at both Worthing and Guildford.

While we accept this as the current situation we feel this makes a very strong case for the need to upgrade the SRN in the TfSE region. The South Coast Central Route strategy is the largest in our region with the greatest proportion of schemes highlighted in the SIP. It is the largest area by far of the route strategies that affect the TfSE area and within it has no strategic routes offering end to end strategic level connectivity.

### ***Solent to Midlands***

We welcome the proposal to manage the interplay of local and strategic traffic and contribute to improving network performance but it is not clear how this will be implemented.

We welcome the importance of freight being recognised along this corridor.

### ***Kent to London***

We welcome the objective to support driver welfare and are aligned in our prioritisation of this for this corridor.

We welcome the objective to support effective local and regional connectivity through improved integration with sustainable transport modes to minimise the impact of short distance trips from key growth areas and strategic development sites to benefit the economy as we also recognise this to be a particular problem on this corridor.

## **20. What specific comments would you like us to consider in relation to Chapter (7) Locational Areas for Consideration?**

### ***In reference to all 6 route strategies in the TfSE Area***

We welcome the alignment of the route strategies to the DfT's six strategic objectives and would like to know more about how they will be used to assess the RIS3 performance metrics. We are concerned with the lack of any new schemes outlined for RIS3 and would like to know what impact this will have, particularly in reference to growing the economy & network performance.

We are pleased that the schemes which are identified for delivery as part of RIS2 (into 3) are aligned with TfSE's priority SRN schemes in the SIP. We are also aligned regarding the schemes identified for RIS4 pipeline.

Regarding schemes incomplete in RIS2 we strongly believe that the process needs to continue through to full business case and DCO (where applicable) to ensure they are ready for delivery when funds become available rather than "parking" them.

We feel it is important not to stop or delay schemes any further than is necessary to help manage expectations of stakeholders in the region and not discourage private investment due to a perceived lack of commitment. We have two major airports

0300 3309474

[tfse@eastsussex.gov.uk](mailto:tfse@eastsussex.gov.uk)

[transportforthesoutheast.org.uk](http://transportforthesoutheast.org.uk)

Transport for the South East, County Hall,  
St. Anne's Crescent, Lewes, BN7 1UE



and several international sea ports that are key to the economy and require better links to meet growth plans and support the government's policy of economic growth, both regionally and internationally.

In the TfSE region we have particular concern over delays to the Arundel scheme. It is our view that a lot of work has already been completed and to stop at this point would be wasteful. National Highways should continue to progress these schemes through the statutory process to avoid having to restart at additional cost in the future.

## **21. What specific comments would you like us to consider in relation to Chapter (8) Next Steps?**

### ***In reference to all 6 route strategies in the TfSE Area***

TfSE will provide more extensive feedback on National Highways' next steps in the Connecting the Country consultation response.

We welcome the reference to TfSE in this section and the recognition of a need for integrated and collaborative solutions and we look forward to helping National Highways consider the interaction of the SRN with other transport networks.

We welcome the objective to use communication and technology to improve user experience in times of disruption.

TfSE priorities include a seamless, integrated transport network, making it simpler and easier to plan journeys. TfSE priorities also highlight the desire for a network that is more resilient to incidents, extreme weather and the impacts of a changing climate, and a 'smart' transport network that uses digital technology to manage transport demand.

### ***London Orbital***

We welcome the support of mode choice solutions for access to the key international airports in and around London, notably at Heathrow and Gatwick. Broadening route choice and improving experience for road users travelling to the airports and sharing road space on the M25 south west quadrant and M23 in particular.

### ***South West Peninsula***

We welcome the support for shifts in modes of transport through better integration with public transport and improved active travel options to relieve pressure on the SRN, particularly in urban areas including Southampton.

### ***London to Wales***

We welcome the support for delivery of regionally significant and sustainable economic development in the Berkshire authorities.

We also welcome the support for effective local connections and integration with other transport modes to reduce short-distance travel demands on the SRN and promote transfer to alternative modes and reduce carbon, particularly in the Berkshire authorities.

## **22. Considering the route selected, to what extent do you agree with the locational areas identified for further consideration in Chapter 7?**

**Please answer 1 - 5, where 1 represents Strongly Disagree and 5 represents Strongly Agree**

4

## **23. Please could you tell us why you gave this rating? Have we missed anything both in general terms or at specific locations?**

### ***In reference to all 6 route strategies in the TfSE Area***

We welcome the alignment of the schemes identified but also the general alignment of areas of interest with areas that are identified in the SIP for improvement. Most of our long-term priorities are included within schemes or areas of interest. We would however, like to identify for future areas of interest the locations set out below which do not appear to be included.

<b>SIP Scheme</b>	<b>Description</b>	<b>Relevant Route Strategy</b>	<b>Covered in route strategy Area of Interest?</b>
M2 Junction 4 - Junction 7 Smart Motorway (SMP)	Deliver smart motorway initiatives along the M2 between Junction 4 and 7 - to increase capacity, resilience and support freight movements.	Kent Corridors to M25	Junction 4 is within the Area of Interest: F but most of road in SIP not within the A of I
A2 Canterbury Junctions Enhancements	Deliver improvements to enhance capacity, improve resilience and reliability and safety at A2 junctions serving Canterbury.	Kent Corridors to M25	Area of Interest D (doesn't reach Eastern Junction set out in the SIP) - A2 (M2 Junction 7 Brenley Corner to Canterbury)
M25 Junction 5 Enhancements	Deliver improvements to increase capacity, improve resilience and reliability and safety at M25 Junction 5.	London Orbital and M23	No

SIP Scheme	Description	Relevant Route Strategy	Covered in route strategy Area of Interest?
A27 Falmer – Polegate Bus Stop and Layby Improvements	Inter-urban bus enhancements along the A27, along with bus priority measures to provide a faster, more frequent and reliable service between Falmer, Polegate and other rural communities along the corridor, without hindering other traffic movements.	South Coast Central	No
A27 Devils Dyke Junction Enhancements	Improvements at A27 Devils Dyke Junction to improve safety of all road users while safeguarding journey time reliability.	South Coast Central	within Area of Interest: J on the map but unclear from text if will be considered as part of A23/27 junction
A23 Hickstead and Bolney Junction Enhancements	A23 Junction enhancements at Hickstead and Bolney to increase connectivity and accommodate planned growth around Burgess Hill.	South Coast Central	NO

In addition to the schemes above we would like to remain in dialogue as an advocate for Medway in regard to the issues around Capacity on the M2 at Junction 1 in order to unlock the development identified along this corridor.

We would also like to engage further on the priorities set out as areas of interest in the table below which do not appear as priority in our SIP.

Name	Route Strategy
A259 Bexhill (between Little Common and Glynde Gap)	South Coast Central
A303 from Amesbury to Andover	South West Peninsula

### **South Coast Central**

We are unclear regarding the status of RIS4 pipeline scheme number 1 - A21 Safety Scheme. RIS4 schemes won't commence until 2030-2035 but in the description of this schemes it states "We are bringing forward a series of schemes to improve safety along this corridor, which will include, junction improvements, improvements to road alignment and visibility, changes to speed limits, improved signing, markings and road studs, amongst others. Note this scheme has been accelerated and works have started. Planned to open to traffic in 2024-25". If this is the case shouldn't this be included in the RIS2 schemes section?

**24. Considering the Initial Overview Report, how well does this report consider your needs?**

**Please answer 1 - 5, where 1 represents Not Very Well and 5 represents Very Well**

5

**25. Please could you tell us why you gave this rating?**

*In reference to all 6 route strategies in the TfSE Area*

TfSE recognise the extensive collaboration that has taken place throughout the development process and can see the alignment with both government policy and TfSE's objectives. The schemes which do not appear from our SIP in the areas of interest may be too far on the horizon to be included for RIS3 but we expect that National Highways will continue to collaborate with us and align where possible. We are very happy to see both STB's and TfSE referenced throughout the documents and are very supportive of their content and approach.

## Introduction

Our responses to the consultation questions from the online form can be found in appendix 1. The appendix contains a response in the same format as the online form including the questions.

TfSE is a sub-national transport body (STB), 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, National Highways, Network Rail and Transport for London.

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.

In 2020 TfSE published a thirty-year Transport Strategy for the south east that sets out an ambitious 2050 vision for the area. We have undertaken a programme of area studies to identify multimodal packages of interventions that will be needed to deliver the Transport Strategy.

This led to the publication of our Strategic Investment Plan (SIP) to help both government and LTA's prioritise investment in our region. The packages detailed in the SIP address eight investment priorities aligned with the vision and strategic goals of the TfSE Transport Strategy and the wider regional and national policy context. It provides a framework for investment in strategic transport infrastructure, services, and regulatory interventions in the coming three decades.

The SIP represents the culmination of five years of technical work, stakeholder engagement, and institutional development. It 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, cross-boundary interventions.
- Assess the impact of proposed interventions on transport and socio-economic outcomes.

0300 3309474

[tfse@eastsussex.gov.uk](mailto:tfse@eastsussex.gov.uk)

[transportforthesoutheast.org.uk](https://transportforthesoutheast.org.uk)



Transport for the South East, County Hall,  
St. Anne's Crescent, Lewes, BN7 1UE

- Prioritise the interventions that best address the south east's most pressing challenges and unlock the south east's most promising opportunities.

National Highways are one of our key partners and are represented on our Partnership Board, as well as having been engaged as stakeholders throughout the development of our technical work programme. National Highways will be key in helping us to deliver the vision set out in our Transport Strategy and SIP. TfSE have been actively engaged with National Highways RIS3 development and the Route Strategies work.

TfSE welcome the opportunity to comment on the Connecting the country report. In general, we welcome the content and are happy to see the collaboration we have had with National Highways through this process has been positively received. The Connecting the country report contains a lot of good work and we look forward to continuing our develop our collaborative working relationship with National Highways.

We would be happy to discuss any of the feedback in our response, and the opportunities for further collaboration to ensure that our strategy and SIP, and National Highways planning for the long term and RIS3 are aligned.

This is an officer response. The TfSE Partnership Board next meets on 30 October 2023 when it will consider this response. A further iteration of it may follow that meeting.

Yours sincerely

Rupert Clubb  
Lead Officer  
Transport for the South East



## Appendix 1

**Do you feel that the Connecting the country: Our long-term strategic plan reflects your view of what the future of the Strategic Road Network should be?**

**Not at all, undecided, somewhat, completely**

Somewhat

### **Please explain why you gave this rating.**

The vision of National Highways is aligned with that of Transport for the South East (TfSE) as set out in our Transport Strategy regarding delivery of sustainable economic growth, improving the health and wellbeing for residents and protecting and improving the environment. However, we would welcome a more outcome led approach like that adopted by sub-national transport bodies (STB's) and local transport authorities alike.

It is not clear what outcomes National Highways wish to achieve or how these outcomes will be delivered. There is also a focus on providing more capacity to meet forecast numbers of car drivers. Contrary to this STB's (TfSE in particular) are endeavouring to provide people with travel choices and encourage modal shift away from the private car.

TfSE supports the intention to improve:

- Number of and quality of interchanges with walking, cycling, public and rail modes of transport for passengers and freight.
- Number of and quality of freight vehicle facilities on the SRN.
- Increasing the number, location and charge capacity of the EV points for both cars and freight vehicles.
- Net zero operations and improving asset resilience.
- Road safety.

**National Highways is proposing to categorise the Strategic Road Network (SRN) and define the associated levels of services our customers can expect from them. Our current thinking, which requires further development, is that the categories would be national corridors, inter-regional routes and regional connections, depending on the role the SRN plays in each part of the country (see image and definitions on page 8). Do you feel that national corridors, inter-regional routes and regional connections are the correct categories for the Strategic Road Network?**

**Not at all, undecided, somewhat, completely**

Somewhat

## **Do you have any further comments on how we have categorised our network?**

TfSE appreciate idea behind the national, inter-regional and regional connections approach but have a number of concerns around its application.

It is not clear from the map provided where the specific routes would be located and what international gateways, cities and towns these routes would connect. Whilst we appreciate the map is indicative, there appear to be some significant gaps that have not been highlighted and therefore, we would like more consultation with STBs and local authorities to discuss this categorisation, particularly which types of connection are located to strategically important origins and destinations within STB areas e.g., Southampton and across the south coast.

We have concerns over creating a tiered system and what this would mean for development of routes not in the highest tier. As an example, the A27 corridor which is recognised in the South Coast Central Route Strategy to be “notable as the only element of the SRN running east – west to the south of the M25” but would not be prioritised in the highest tier. We would also want to establish how these categorisations could influence or be used to prioritise scheme delivery and network improvements.

A further example not in the TfSE area but also overlooked is Felixstowe, which appears not to have been recognised as an important international gateway.

## **Do the nine focus areas match your view of where we should focus the future of the Strategic Road Network?**

- **How much our customers will travel**
  - **Growth & levelling up**
  - **Car travel**
  - **Freight & logistics**
- **How our customers will experience travel**
  - **Safety**
  - **Digital**
  - **Decarbonisation**
- **How we will manage our network**
  - **Customer experience**
  - **Sustainable network development**
  - **Asset resilience**

**Options – yes, no, undecided**

Yes

## **Which focus area would you like to engage with?**

All

# TfSE consultation response to National Highways Connecting the Country Growth & Levelling Up



**Do you feel the trends outlined for 'Growth and Levelling up' reflect your view of the future? (Pages 17-20 of CTC)**

**Not at all, undecided, somewhat, completely**

Completely

**Please tell us why you gave this rating.**

TfSE agrees that the SRN plays a vital role in providing connectivity to support sustainable economic growth, productivity and levelling up for businesses, employees and those accessing employment opportunities, health, leisure and education facilities.

**Do you feel the vision outlined for 'Growth and Levelling up' reflects your view of the future? (Page 52)**

**Not at all, undecided, somewhat, completely**

Completely

**Please tell us why you gave this rating.**

TfSE supports National Highways vision of equality of opportunity for all its users and its vision to support regional and sub-regional aspirations for sustainable and inclusive growth.

**Do you feel our delivery plan outlined for 'Growth and Levelling up' reflects your view of the future? (Page 56)**

**Not at all, undecided, somewhat, completely**

Somewhat

**Please tell us why you gave this rating.**

The delivery plan supports TfSE's Transport Strategy and SIP, particularly in relation to:

- Lower Thames Crossing.
- Regional growth.
- Supporting businesses.
- Sustainable growth.

However, we would like to see a wider range of scenarios considered to ensure that the delivery plans are achievable. As an example, to consider the effect of a lower take up of CAVs. Or the availability of land and planning processes become constraining factors, particularly in relation to cities, towns, ports and airports becoming centres of regeneration and freight hubs.

0300 3309474

[tfse@eastsussex.gov.uk](mailto:tfse@eastsussex.gov.uk)

[transportforthesoutheast.org.uk](http://transportforthesoutheast.org.uk)



Transport for the South East, County Hall,  
St. Anne's Crescent, Lewes, BN7 1UE

## Car travel

**Do you feel the trends outlined for 'Car travel' reflect your view of the future? (Pages 21-23)**

**Not at all, undecided, somewhat, completely**

Somewhat

**Please tell us why you gave this rating.**

TfSE is concerned that there remains an emphasis on population growth driving an increase in private car travel rather than on managing car usage or encouraging modal shift to active travel and/or public transport. ONS figures show that the UK population is aging, this could suggest that fewer people will drive, although this may be balanced by behavioural studies that suggest an increase in carbon zero vehicles can cause an increase in private car travel or that private car travel will be easier with the uptake of CAVs. The use of a range of scenarios based on different kinds of population expansion could be used to test different assumptions of increased private car travel demand.

Furthermore, we would advocate a more Vision led approach, such as that undertaken for our transport strategy, which would not just plan for a future based on predicted growth, but rather sets the vision for the future and plans to deliver that.

**Do you feel the vision outlined for 'Car travel' reflects your view of the future? (Page 52)**

**Not at all, undecided, somewhat, completely**

Somewhat

**Please tell us why you gave this rating.**

TfSE support the targeted improvement to create a fully integrated network to deliver seamless multi-modal travel as an important lever to deliver carbon zero travel and encourage the movement of private car drivers to alternative forms of transport. However, this is reliant on the take up and use of digital technology and the provision of public information. Again, the use of scenarios may better inform how private car-based customers make behavioural changes in moving from car to active and/or public transport-based travel.

**Do you feel our delivery plan outlined for 'Car travel' reflects your view of the future? (Page 57)**

**Not at all, undecided, somewhat, completely**

Somewhat

**Please tell us why you gave this rating.**

While TfSE supports the focus on network integration with active and public transport-based transport and modal shift, the use of population forecasts might be better supported by an outcome focussed delivery plan that concentrates

# TfSE consultation response to National Highways Connecting the Country



more on behavioural change to increase the number of journeys shifting from private car to public transport or active travel modes.

We also support the improved visibility and monitoring of network performance to improve the resilience of the network. However, we would welcome the addition of some scenario-based plans that can account for variations in the way drivers, whether private or commercial, interpret such information to ensure the information to drivers is delivered in a way that is useful to them and results in the actions expected in the description provided.

## Freight & Logistics

### **Do you feel the trends outlined for 'Freight & logistics' reflect your view of the future? (Pages 24-27)**

**Not at all, undecided, somewhat, completely**

Somewhat

#### **Please tell us why you gave this rating.**

TfSE supports the general direction set out in the freight and logistics trends section. However, we would like to see this updated to include the changes brought about because of the changing relationship with Europe and the proposed changes that GBRTT foresee in encouraging a higher use of rail in the movement of freight, particularly in the future years of 2040 and 2050. Again, the use of scenarios here would be beneficial.

### **Do you feel the vision outlined for 'Freight & logistics' reflects your view of the future? (Page 52)**

**Not at all, undecided, somewhat, completely**

Somewhat

#### **Please tell us why you gave this rating.**

TfSE supports the vision for freight and logistics. However, from our own work in this area, we would caution against too much emphasis on consolidation as a potential panacea, particularly for articulated loads. We would also question the assumption that there will be the land available and site allocations through the planning process approvals process to support the increase in interchange facilities required to facilitate the transfer of freight from road to other modes.

### **Do you feel our delivery plan outlined for 'Freight & logistics' reflects your view of the future? (Page 58)**

**Not at all, undecided, somewhat, completely**

Somewhat

#### **Please tell us why you gave this rating.**

While TfSE supports the aims of the delivery plan, we would again caution against the over-reliance on consolidation as a means to achieve your vision and the early

0300 3309474

[tfse@eastsussex.gov.uk](mailto:tfse@eastsussex.gov.uk)

[transportforthesoutheast.org.uk](http://transportforthesoutheast.org.uk)



Transport for the South East, County Hall,  
St. Anne's Crescent, Lewes, BN7 1UE

adoption of autonomous freight vehicles. However, we particularly support the delivery of strategic freight corridors and the aim to deliver increased modal shift away from road-based freight transport.

## **Safety**

**Do you feel the trends outlined for 'Safety' reflect your view of the future? (Pages 29-31)**

**Not at all, undecided, somewhat, completely**

Completely

**Please tell us why you gave this rating.**

TfSE supports the trends set out in the Connecting the country report as this aligns with our view of the future set out in our Transport Strategy, which seeks to improve the health and wellbeing of residents in the TfSE area.

**Do you feel the vision outlined for 'Safety' reflects your view of the future? (Page 53)**

**Not at all, undecided, somewhat, completely**

Completely

**Please tell us why you gave this rating.**

TfSE fully supports the vision which is aligned with our own.

**Do you feel our delivery plan outlined for 'Safety' reflects your view of the future? (Page 59)**

**Not at all, undecided, somewhat, completely**

Somewhat

**Please tell us why you gave this rating.**

TfSE generally supports the delivery plan outline for Safety. However, we would be interested to see what effect a lower take up of CAVs has on the delivery of your vision. We also suggest using more public information messaging aimed at all road users, not just drivers, as a way to improve user and operational safety on the network.

## **Digital**

**Do you feel the trends outlined for 'Digital' reflect your view of the future? (Pages 32-35)**

**Not at all, undecided, somewhat, completely**

Somewhat

## **Please tell us why you gave this rating.**

TfSE agrees with the trends set out on the digitisation of the road network section. Particularly in improving the construction and resilience of the network, and its use to maximise network assets. However, we would like to see more evidence regarding some of the issues relating to the uptake of autonomous vehicles and how the provision of digital information affects driver-related behaviour change are dealt with as outlined in your strategy. Issues include:

- The potential for personal and company driver and company insurance to cause delays to or accelerate uptake.
- The impact of cost of CAV technologies on uptake by the freight sector.
- The need for legislative changes could also delay the uptake of CAV's in both the private and commercial sectors.
- How the delivery of a digital real-time information to drivers affects changes in driver behaviour.

It would also be useful to see more information about how the digitalisation of the network could improve real-time traffic management, particularly to improve driver and operator safety and journey time reliability.

## **Do you feel the vision outlined for 'Digital' reflects your view of the future? (Page 53)**

**Not at all, undecided, somewhat, completely**

Completely

## **Please tell us why you gave this rating.**

TfSE supports the vision outlined and how digitalisation can improve the use, design and resilience of the network by customers and network operators alike.

## **Do you feel our delivery plan outlined for 'Digital' reflects your view of the future? (Page 60)**

**Not at all, undecided, somewhat, completely**

Somewhat

## **Please tell us why you gave this rating.**

TfSE supports the digitalisation of the network with the caveat that some of the issues with take up and behaviour change outlined in previous responses previously raised are addressed.

## **Decarbonisation**

### **Do you feel the trends outlined for 'Decarbonisation' reflect your view of the future? (Pages 36-38)**

**Not at all, undecided, somewhat, completely**

Somewhat

0300 3309474

[tfse@eastsussex.gov.uk](mailto:tfse@eastsussex.gov.uk)

[transportforthesoutheast.org.uk](http://transportforthesoutheast.org.uk)



Transport for the South East, County Hall,  
St. Anne's Crescent, Lewes, BN7 1UE

### **Please tell us why you gave this rating**

TfSE's Transport Strategy and SIP aim to deliver a zero-carbon transport network in south east England by 2050 at the latest and we support the trends outlined in the Connecting the country report. However, as stated in response to a previous question, we would prefer to see a strategy based on the delivery of outcomes rather than the model which assumes a significant increase in car travel resulting from an increase in population.

Our own Transport Strategy seeks to achieve a relative decrease in car travel compared to a business-as-usual trajectory. Particularly to support the delivery of a zero-carbon network by encouraging modal shift to active travel or public transport. Increased active travel would also deliver health benefits. There should be a reference to addressing air quality issues although it is acknowledged that this issue is referred to in the section on sustainable network development.

### **Do you feel the vision outlined for 'Decarbonisation' reflects your view of the future? (Page 53)**

**Not at all, undecided, somewhat, completely**

Completely

### **Please tell us why you gave this rating.**

The vision for Decarbonisation fully reflects the aspirations set out in TfSE's Transport Strategy and SIP.

### **Do you feel our delivery plan outlined for 'Decarbonisation' reflects your view of the future? (Page 61)**

**Not at all, undecided, somewhat, completely**

Somewhat

### **Please tell us why you gave this rating.**

While TfSE supports National Highways in the delivery of its decarbonisation vision, it would be useful to include some scenarios where the capacity of the UK's power supply or supply of alternative fuels to support the complete decarbonisation of the network does not meet the ambition as set out here.

## **Customer Experience**

### **Do you feel the trends outlined for 'Customer Experience' reflect your view of the future? (Pages 40-42)**

**not at all, undecided, somewhat, completely**

Completely

### **Please tell us why you gave this rating.**

TfSE agrees that the trends set out in this section may well be realised. In particular, the potential for increasing journey time reliability and reducing delays as this is equally important for freight and logistics customers as it is for private car drivers. The use of technology is supported as it will improve the efficiency and reliability for public transport and freight also ensuring they can keep their



# TfSE consultation response to National Highways Connecting the Country



customers informed if and when delays occur. We would also welcome the improvements in freight and logistics driver parking, welfare, recharging and refuelling facilities. We would encourage, however, the inclusion of alternative fuels and HGVs in the section 'The SRN can help set the standard for customer-centric charging infrastructure' set out in the decarbonisation and 'Our Vision' sections. The SRN should also be the 'standard' for all types of alternative fuel given that most trailer HGVs use the SRN for their journeys and electric charging is unlikely to be appropriate for these kinds of vehicles in the future.

## **Do you feel the vision outlined for 'Customer Experience' reflects your view of the future? (Page 54)**

**Not at all, undecided, somewhat, completely**

Completely

### **Please tell us why you gave this rating.**

TfSE fully supports the vision as set out, it will help support our own ambition for modal shift and improve the welfare of HGV drivers. This will contribute to the sustainability of the freight and logistics sector which is of particular interest to us in our role as the Gateway to the UK Economy'.

## **Do you feel our delivery plan outlined for 'Customer Experience' reflects your view of the future? (Page 62)**

**Not at all, undecided, somewhat, completely**

Completely

### **Please tell us why you gave this rating.**

TfSE supports the customer experience delivery plan this will enable (providing some of the caveats previously raised are addressed). This will support the delivery of our own Transport Strategy and SIP, reflecting as it does our own preferred outcomes for the SRN. This is particularly the case in relation to the planned ability of the SRN to provide:

- Better connectivity between major areas of economic growth and employment as well as international gateways.
- Improve journey times and reliability.
- Improve HGV parking, refuelling and driver welfare facilities.

## **Sustainable network development**

### **Do you feel the trends outlined for 'Sustainable network development' reflect your view of the future? (Pages 43-46)**

**Not at all, undecided, somewhat, completely**

Completely

0300 3309474

[tfse@eastsussex.gov.uk](mailto:tfse@eastsussex.gov.uk)

[transportforthesoutheast.org.uk](http://transportforthesoutheast.org.uk)



Transport for the South East, County Hall,  
St. Anne's Crescent, Lewes, BN7 1UE

**Please tell us why you gave this rating.**

As part of TfSE's Transport Strategy we have committed to protecting and enhancing the environment and therefore we support this aspect of your Strategy. In particular, we support:

- The use of low-carbon construction materials.
- Working to ensure that there is no net loss of biodiversity, with a focus on increasing this going forward.
- Reducing exposure to fine particulate matter and improving air quality.

**Do you feel the vision outlined for 'Sustainable network development' reflects your view of the future? (Page 54)**

**Not at all, undecided, somewhat, completely**

Completely

**Please tell us why you gave this rating.**

The vision set out here reflects our own in the TfSE Transport Strategy, TfSE welcomes this aspect of the National Highways Strategic Vision 2050 and believes that it will add value to our own outcomes as set out in our SIP.

**Do you feel our delivery plan outlined for 'Sustainable network development' reflects your view of the future? (Page 63)**

**Not at all, undecided, somewhat, completely**

Completely

**Please tell us why you gave this rating.**

TfSE supports the delivery plan as set out in this part of the Strategy and we look forward to working together with National Highways to successfully deliver our shared objectives.

## **Asset Resilience**

**Do you feel the trends outlined for 'Asset Resilience' reflect your view of the future? (Pages 47-50)**

**Not at all, undecided, somewhat, completely**

Completely

**Please tell us why you gave this rating.**

TfSE supports the evidence set out in the trends section of the plan. We agree with your aspiration to renew much of the network's assets maximising the benefit of modelling and new technology to optimise the condition of the SRN assets and optimise the whole life value and National Highways cost efficiency. We also support your holistic approach considering many influencing factors such as climate change and the impact different aspects of this has on the increased deterioration of some assets, e.g., concrete roads and bridges.

# TfSE consultation response to National Highways Connecting the Country



**Do you feel the vision outlined for 'Asset Resilience' reflects your view of the future? (Page 54)**

**Not at all, undecided, somewhat, completely**

Somewhat

**Please tell us why you gave this rating.**

As stated in our responses to other focus areas of the plan, TfSE is concerned that there may be an over-reliance on digital technology as the basis for decision-making. Again, we would suggest that some scenarios are included to demonstrate whether there are other solutions that could deliver the same outcome of maximising the life of SRN assets in the more cost-effective way.

**Do you feel our delivery plan outlined for 'Asset Resilience' reflects your view of the future? (Page 64)**

**not at all, undecided, somewhat, completely**

Somewhat

**Please tell us why you gave this rating.**

While TfSE is supportive of the delivery plan, we would prefer to see some options included that factor in different outcomes to those that you assume will come to fruition in later years e.g., the extent and reliance on digitisation. In maintaining and maximising SRN assets in the ways described here for connected assets, asset renewals and climate change resilience, National Highways demonstrates its commitment to operating a network that will support our own strategic priorities objectives.

0300 3309474

[tfse@eastsussex.gov.uk](mailto:tfse@eastsussex.gov.uk)

[transportforthesoutheast.org.uk](http://transportforthesoutheast.org.uk)



Transport for the South East, County Hall,  
St. Anne's Crescent, Lewes, BN7 1UE

# House of Commons Transport Select Committee Call for Evidence on Strategic Transport Objectives

## Response from Transport for the South East

### 1. Introduction

1.1 Transport for the South East (TfSE) welcomes the opportunity to respond to the House of Commons Transport Select Committee's Call for Evidence on the Government's Strategic Transport Objectives.

1.2 This is a draft officer response that will be presented to the TfSE Partnership Board in October 2023 for them to agree. A further iteration may therefore follow.

1.3 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) 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.

1.4 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.

1.5 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.

1.6 TfSE welcome this inquiry by the Select Committee into the Government's Strategic Objectives. Specifically to identify to what extent the Government takes a long-term, national and multi-modal approach to planning, maintaining and developing the country's transport needs, and what difference adoption of clear, national strategic objectives for transport could make. We trust that our response to the questions posed below provide value to the Committee.

**2. (Question 1). What is your understanding of the Government's strategic transport objectives? Are they the right ones, and if not, how should they be changed?**

2.1 Currently there is a lack clarity over what the Government's strategic transport objectives are. The Department for Transport's [website](#) lists the following as its priorities:

- boosting economic growth and opportunity
- building a One Nation Britain
- improving journeys
- safe, secure and sustainable transport

2.2 The website then links to an outcome delivery plan for 2021/22, where the three priority outcomes are listed as:

- Improve connectivity across the UK and grow the economy by enhancing the transport network, on time and on budget.
- Build confidence in the transport network as the country recovers from COVID-19 and improve transport users' experience, ensuring that the network is safe, reliable, and inclusive.
- Tackle climate change and improve air quality by decarbonising transport (this outcome reflects DfT's contribution to the BEIS-led cross-cutting net zero outcome).

2.3 Further strategies such as Bus Back Better, Gear Change, the Future Mobility: urban strategy, and the Road Investment Strategy also set out further priorities and objectives. These shifting objectives and outcomes often focus, with the probable exception of climate change and economic growth, on transport-specific matters. It is our view that the Government's strategic transport objectives should be focussing on wider outcomes that all government departments should be seeking to achieve including the following:

- Climate change and achieving Net Zero
- Economic growth and regeneration
- Tackling social exclusion and inequality
- Levelling up the UK
- Improving health and contributing to the wellbeing of the population

2.4 The delivery of these outcomes requires an integrated multimodal approach to transport planning that the Department for Transport is not currently organised

to realise. Currently there is too much focus on delivering modally based investment plans that limit the ability to achieve these wider outcomes.

2.5 The delivery of these outcomes also requires close partnership working between a variety of partners to enact the significant changes that are required. 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 made to date. But this process has also demonstrated how different priorities and understanding of issues can cause problems in delivery.

2.6 Throughout the work of our partnership we have observed a number of gaps in regional transport planning. 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](#) produced by the Institution of Civil Engineers, with little in the way of strategic co-ordination. STBs have attempted to address 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 is still needed as long as the resulting investment plan does not lose sight of the overarching strategic outcomes that should be sought.
- **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 establishment of a series of regional centres of excellence.

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

2.7 In summary, it is our view that the Government's transport objectives need to be focussed on achieving wider environmental, societal and economic benefits that an integrated multimodal approach to transport planning at the national, regional and local level can deliver. They need to be expressed on a consistent basis rather than shifting as new national strategy, policy and investment plans emerge. Objectives focussing on matters such as decarbonisation, economic growth, levelling up, and improving social outcomes are supported by our Partnership Board. But what is critical is the tone and direction of these objectives, which should provide a clear and consistent policy direction across all transport modes. This is what is currently missing.

### **3. (Question 2). How well has the Government articulated the outcomes and objectives it seeks from the country's transport network? How could this be improved, and what impact would better-defined objectives have on transport planning and investment**

3.1 The most significant challenge involved in defining outcomes and objectives is coming to a common view on what these outcomes and objectives mean. As stated in our answer to Question 1, the current objectives and outcomes for transport are shifting and unclear. Good policy making should seek to achieve an overall vision for the nation and articulate transport's role within that and the outcomes that are being sought.

3.2 TfSE would welcome the creation of a national transport strategy for England that is closely linked to an overall future vision for the nation's transport system. 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.

3.3 On a more practical level, best practice on objective setting states that these should be SMART. Namely Specific, Measurable, Achievable, Realistic, and Time-Bound. Doing so requires engagement and discussion with key stakeholders, including political stakeholders. Without this the result can be the formulation of objectives that do not satisfy these tests, or are not relevant to their context, and in some cases do not contain any objectives at all. For example, the Road Investment Strategy 2 contained a 'Strategic Vision' and provides some descriptions of what that vision entails, but has no objectives associated with it.

#### **4. (Question 3). How well does the appraisal and decision-making process for new transport investment meet the Government's strategic transport objectives? How should this be improved?**

4.1 The Transport Analysis Guidance (TAG) process has undergone significant changes over the last 10 years, most notably with the introduction of the [TAG uncertainty toolkit](#) that requires practitioners to assess interventions against a variety of future scenarios. At a regional level, this has enabled STBs to develop their analytical frameworks support the development of business cases including those being developed by Local Transport Authorities for major transport schemes.

4.2 It is important to consider that the appraisal process is simply one part of the wider decision making process on schemes, as identified in TAG and guidance in the HM Treasury Green Book. This decision making process emphasises that appraisal simply supports the development of a business case for any new transport investment in the development of major transport investment, such as major schemes. This is established in [the Department for Transport's Business Case Guidance](#).

4.3 Within this framework, strategic objectives align most closely with the Strategic Dimension section of the business case. The practical challenge is aligning relevant strategic priorities to the scheme being appraised. For instance, major bus infrastructure improvements may align well with Bus Back Better, whilst major active travel schemes may align well with Gear Change.

4.4 Whilst in a practical sense this does not deter schemes from being developed and potentially funded, the result is that the strategic cases for schemes are not being considered on a consistent basis. In the absence of over-arching Government transport objectives, each scheme is considered on its individual merits as a modally specific scheme, as opposed to a transport scheme potentially delivering wider societal, environmental or economic benefits.

#### **5. (Question 4). How should wider economic, environmental and social impacts be appraised and valued, including when the gains will largely be felt in policy areas other than transport?**



5.1 Whilst the recent changes to the Treasury [Green Book](#) have provided a shift in thinking, it is important to note that transport is an enabler, and so the current [Transport Analysis Guidance](#) (TAG) is often too narrow to fully capture the wider benefits of schemes. This is particularly the case where they are facilitating development and the provision of new homes and employment opportunities. In these instances the use of a 'Strategic Economic Narrative' to join up the traditional strategic and economic dimensions of the business cases can be useful to clearly set out the case for a scheme. This can be supplemented with additional (non-TAG) analysis and appraisal to capture the wider benefits that will be realised by the housing and employment opportunities facilitated by the scheme, which can often differ from the more traditional definition of "dependant development".

5.2 In their response to the Green Book Review, DfT published [Capturing local context in transport appraisal](#). The use of a wider range of appraisal tools and techniques such as those described in that document should be encouraged, where appropriate. The officials assessing business cases should be open to considering these alternative assessments. Decision makers should follow the principles of the Green Book revisions and need to be made aware of the entirety of the five case business case process, and not overly focus on just the benefit cost ratio (BCR) within the economic case.

## **6. (Question 5). How can longer-term certainty in planning be achieved in order to promote greater private sector investment from a range of sources?**

6.1 The most important consideration here is that funding needs to be planned and delivered on a longer term basis. This is needed to give those responsible delivering and potentially funding schemes the certainty that is needed to warrant significant investment over time. Currently, funding for different modes of transport is allocated as follows:

- Rail: Control Periods of 5 years
- Highways (Strategic): Road Investment Strategy periods of 5 years
- Highways (Local): Annual allocations through Integrated Transport Block, Road Maintenance funding allocations, and local authority own spend, with occasional funding bids
- Buses: Allocated through BSIP, but not to all local authorities, who may decide to support bus services in their own way
- Active travel: Rounds of the Active Travel Fund
- Other time-limited one-off funding bids such as the Levelling Up Fund, Housing Infrastructure Fund, the Safer Roads Fund, and the Future Transport Zones

6.2 The [National Infrastructure Strategy](#) identifies major national scale schemes to be delivered, and the funding required to do so. However, this does not account for necessary improvements to local infrastructure that are required to complement these larger scale schemes and which are critical to the people and places where they will be introduced.

6.3 This picture of a fractured funding landscape with relatively short-term funding allocations discourages effective long term planning and this in turn discourages private sector investment. What is needed to address this is longer

term pipelines of funding that would allow regional and local areas to develop longer term scheme delivery plans. TfSE's [Strategic Investment Plan \(SIP\)](#) provides a framework for investment in strategic transport infrastructure, services, and regulatory interventions in the coming three decades. It includes a section on how the interventions within it can be paid for including an exploration of approaches that seek to monetise a share of the specific value that projects deliver for beneficiaries, which in turn makes them more of an attractive proposition for potential funders.

6.4 Consideration needs to the introduction of regional funding allocations, that enable a move away from a ring-fenced, siloed modal based approach to transport infrastructure funding to one based on an integrated and multimodal approach. The longer-term funding settlements enjoyed by Mayoral Combined Authorities provide certainty and confidence required to invest in in-house transport planning and design capacity and develop pipelines of projects and procurement that delivers the best outcomes and best value. The model that currently operates in London and the Mayoral Combined Authorities and needs to be extended nationally.

## **7. (Question 6). How effectively is strategic transport planning and investment coordinated across and between transport modes, including with reference to achieving modal shift?**

7.1 Throughout its work, TfSE engages proactively with a number of stakeholders responsible for the management of national transport networks including National Highways, Network Rail and Sustrans . In our experience, all our key stakeholders are committed to working in partnership and across different modes of transport, and when strategies and projects interface, we try and work positively together. An example of this is the way in which National Highways have sought to involve STBs in the development of their [Route Strategies](#) and their [Strategic Road Network Initial Report](#). We have had a similar level of engagement with Network Rail on the development of their investment plans and both these national network operators have been closely involved the development of our Transport Strategy and Strategic investment Plan. However, it is also true to say that this practice is the exception rather than the rule as a consequence of how current governance arrangements operate.

7.2 The policy making and funding landscape across a number of key modes of transport in the South East, is summarised in Table 7.1. This demonstrates how the current governance landscape encourages a siloed approach to the development of policy, with consideration generally limited to that of specific interchange points. A notable example being railway stations, which integrate multiple modes in the same space.

**Table 7.1 – Summary of key policies related to specific modes at a national, regional, and local level within the South East of England**

	<b>National Level</b>	<b>Region and Sub-Region</b>	<b>Local</b>
Highways	Priorities and funding for National Highways established through Road Investment Strategy process (5 year plan and allocation)	TfSE Regional Transport Strategy establishing strategic priorities	Local Transport Plans revised when deemed appropriate by the Local Transport Authority Annual funding allocation for road improvements and maintenance. Major Scheme funding bids for major projects.
Active Travel	Gear Change strategy for walking and cycling	TfSE Active Travel Strategy	Local Cycling and Walking Improvement Plans Annual funding allocation for road improvements and maintenance Major Scheme funding bids for major projects Occasional Active Travel Fund bids
Bus	Bus Back Better Strategy Revenue funding for specific initiatives, notably National Concessionary Bus Pass, the current National Single Fare Scheme Bus Service Operator Grant	Bus Back Better Support Programme	Bus Service Improvement Plans and associated funding Annual funding allocation for infrastructure improvements Revenue support for socially necessary services

	<b>National Level</b>	<b>Region and Sub-Region</b>	<b>Local</b>
Rail	Priorities and funding for Network Rail established through the Control Period process (5 year plans and allocations) Awarding rail franchises	TfSE Transport Strategy and Strategic Investment Plan establishing strategic priorities	Community Rail Partnerships
Freight	Future of Freight Plan	TfSE Freight Strategy and Regional Freight Forum	Freight considerations in Local Transport Plans.
Ports	General Guidance issued by Maritime and Coastguard Agency	TfSE Freight Strategy and Regional Freight Forum	Local planning and highways guidance and decisions as relevant to individual ports
Airports	General Aviation Policy Framework adopted by the Civil Aviation Authority	TfSE Regional Transport Strategy establishing strategic priorities	Local planning and highways guidance and decisions as relevant to individual airports

7.3 Achieving modal shift is recognised by transport planners as necessary to achieving the sector’s Net Zero ambitions. However, to date only one national policy document makes direct reference to the need to achieve modal shift, whilst not being mode-specific in its approach. This the Transport Decarbonisation Plan. The current modal-centric approach to policy development discourages consideration of modal shift as a realistic policy proposition.

7.4 TfSE’s Strategic Investment Plan and Transport Strategy have been developed in a manner that seeks to co-ordinate the disparate national policies and objectives with local policies and plans. As shown in Figure 1, they provide the golden thread between national and local policy and strategy.

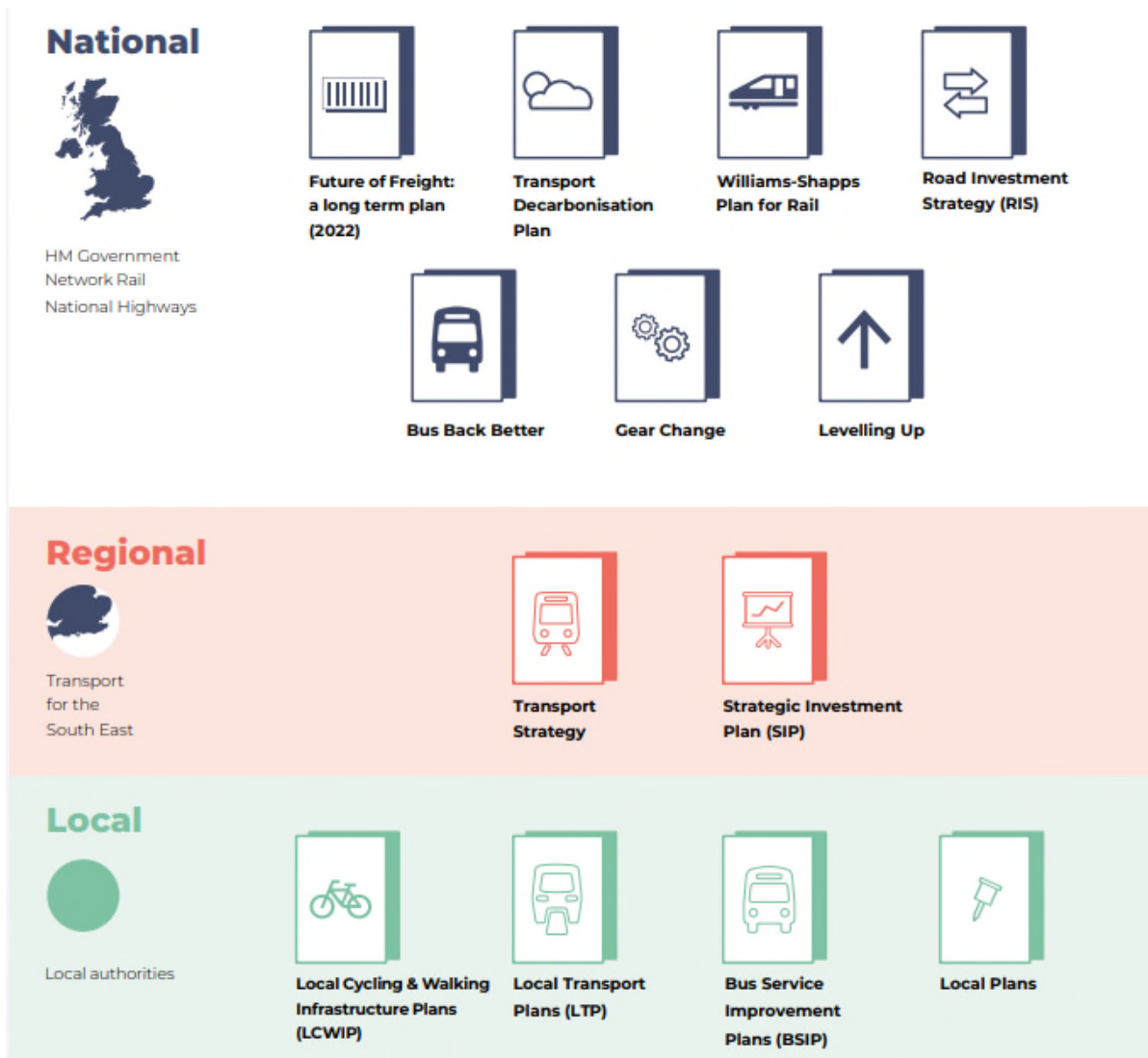


Figure 1 - Alignment of TfSE's regional strategies with national and local planning policies

7.5 Increasingly STBs are working together on various thematic work. An example of this is in our joint working on sharing best practice on cutting transport emissions. By sharing experience, technical approach and knowledge we're able to better support our local partners in their approach to delivering the UK's net zero targets for transport. Other areas when joint working is taking place include rail, freight, rural transport, electric vehicle charging infrastructure and the development of a common analytical framework.

**8. (Question 7). How could planning for transport infrastructure across government and coordination of policy (for example, with policy on energy, digital or planning) be made more coherent and streamlined?**

8.1 TfSE is of the view that the co-ordination of transport policy requires a national 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. These would identify the interventions needed to address the specific challenges and opportunities in their areas.

8.2 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.

8.3 With regards to interfaces with other policy areas, TfSE is of the view that the following policy areas have a significant interface with transport policy at all levels of government:

- Planning policy (Department for Levelling Up and Communities)
- Digital and communications policy (Department for Digital, Culture, Media, and Sport)
- Economic policy (HM Treasury, Department for Science, Innovation, and Technology, and Department for Business and Trade)
- Levelling Up Agenda (Department for Levelling Up and Communities)
- Climate Change and Net Zero policy (Department for Energy Security and Net Zero and Department for Environment, Food, and Rural Affairs)

8.4 This a non-exhaustive list, as transport touches every aspect of life and modern society. Links with other outcomes in addition to those above can include equity, healthcare, social isolation.

8.5 In developing any objectives for new strategies, standard practice is to undertake a review of existing policies to ensure compliance. This has been standard in Local Transport Plans and Local Plans for many years, as compliance with key documents gives significant weight to those strategies and the schemes contained within them. This is especially the case for Local Plans, which are expected to comply with the National Planning Policy Framework. However, these are examples of 'integrating upwards' where local policies are expected to comply with national policies.

8.5 This is critical for local authorities as it enables a 'gold thread' of objectives to flow from local policies and link individual schemes to regional and national policy. This improves the robustness of local policies and the chances of securing funding for schemes developed to give effect to them.

8.6 What is required is a more is lateral integration of policy objectives across government departments to ensure that policies are mutually beneficial to each other. Enabling this in a manner that is useful for setting transport objectives requires new ways to develop policy that seek collaboration across government departments. One such example is [Triple Access Planning](#), which seeks to achieve future sustainable urban accessibility through the transport system (physical mobility), the land-use system (spatial proximity) and the telecommunications system (digital connectivity); together constituting a Triple Access System (TAS).

8.7 Another potential approach is the use of [systems thinking](#). Used extensively by the Government Office for Science in their Foresight projects, this enables policy makers to understand the different interfaces that the policy area has with others,

and the nature of that relationship. Undertaking a systems mapping exercise and understanding how different policy interventions are likely to interact with different elements of this system should be a necessary part of objective setting and policy making in the future.

**9. (Question 8). How effectively is strategic transport planning and investment coordinated between national, devolved, regional and local government and other public bodies? Do the current division and distribution of powers help or hinder?**

9.1 TfSE has always been clear about the role that STBs should play in delivering better transport outcomes for regions in England. Figure 1 illustrates the golden thread between national, regional and local transport planning provided by TfSE's Transport Strategy and Strategic Investment Plan. 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 the transport investment requirements of their regions;
- Developing regional evidence bases ensures that the differing needs and opportunities within each region are reflected in STB's transport strategies. This enables 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 and delivered by national infrastructure bodies such as Network Rail and National Highways.
- Delivering benefits to transport users through coordinated action to accelerate the delivery of transport infrastructure improvements. An example of this is the Electric Vehicle Charging Infrastructure Strategies that have been developed by STBs. These seek to accelerate the roll out of a comprehensive network charging infrastructure through better coordination of individual local authority activity.

9.2 Should an English national transport strategy and regional funding allocations be established these would provide a policy and funding framework for the regional multimodal transport strategies produced by STBs. These would then provide the primary mechanism for identifying and allocating funds to transport investment priorities across the country. This would present 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 in their areas.

9.3 In order for such benefits to be fully realised and ensure that 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 Transport Act (2008) at the appropriate time. Currently, the only STB with statutory status is Transport for the North. Statutory status would provide STBs with the powers and responsibilities that would be needed to fully deliver their transport strategies and strategic investment plans. [Ends]

# Transport Select Committee call for evidence on the future of transport data

## Submission from Transport for the South East

### Introduction

1.1 Transport for the South East (TfSE) welcomes the opportunity to respond to the House of Commons Transport Select Committee's Call for Evidence on the future of transport data.

1.2 This document constitutes the draft officer response to the request from the Transport Select Committee. It will be presented to the TfSE Partnership Board in October 2023 for them to agree. A further iteration of the response may therefore follow.

1.3 TfSE is a sub-national transport body (STB) for the South East of England, bringing together leaders from across 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.

1.4 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.

1.5 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.
- Examines carbon emissions impacts as well as funding and financing options.



1.6 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.

1.7 TfSE welcome this inquiry by the Select Committee into future transport data. Specifically, to what extent to which the Government takes a long-term, national and informed approach to predicting, providing for, maintaining and developing the country's transport data needs. Our work is evidence based and reliant on access to quality data. As such we welcome the opportunity to contribute to this call for evidence because we understand both the benefit of good data and how it can be used to inform decisions, as well as the risks associated with poor or lack of data.

1.7 We trust that our response to the questions posed below provide value to the Committee. The questions from the call for evidence are listed throughout the rest of this document in bold with TfSE's responses below.

## **2. (Question 1). How might planning and delivery of transport infrastructure and services be changed by greater sharing and use of transport data over the medium and long terms?**

2.1 By sharing transport data, costs can be reduced for transport planners at all levels. The increased use of and access to transport data over the medium and long term will give more insight into the travel patterns of users. It would enable a 'holistic view' of different travel modes on certain high usage routes so decisions could be made regarding improvement of multiple travel options on the same corridor. For example, by looking at road, rail and bus routes between two major economic hubs greater insight will become available regarding interventions e.g., increase in rail frequency and the effects on road congestion. In the long term once data is agreed, shared and collected decisions can be informed using empirical data collected both before and after similar schemes. Improved data could also help to better assess the extent to which objectives have been achieved and give greater insight as to which elements have delivered and how accurate the modelling and predictions were.

2.2 The standardisation of data collection practices would facilitate the exchange of information between parties, e.g., Government, Transport authorities, Consultants, Commercial transport providers and investors.

2.3 While TfSE support the sharing of data we believe that greater benefit could be achieved through central identification procurement and sharing of certain datasets by government or DfT. This would lead to a streamlining of project decision making and assessment across the country, as the metrics will be directly comparable. Through central identification of the right data government can then procure once to secure the best price and make it available to all Local Transport Authorities (LTA).

### **3. (Question 2). How might the travelling public, and local communities, experience the benefits of better use of transport data? What unintended consequences might there be?**

3.1 Better use of transport data could lead to improved public transport options and inter-modal connectivity. By better understanding travel patterns operators will be able to better plan transport options that work for customers. More real time information for public transport will make people more likely to use it. A good existing example of this is real time bus location information. It allows users the freedom to choose to wait indoors if there is a known delay. Access to information can allow contingency to be planned for missed connections further on their journey (potentially through AI in the future) to remove anxiety of multi-modal trips and smooth interchange. Another is tap in/out ticketing making transition from different modes easier and more time efficient, including more smart and integrated ticketing across transport modes. Improved data use could lead to greater efficiency linking non-private car transport modes to make them more time and cost efficient. Improved quality and sharing of transport data would provide an opportunity a more integrated and multi-modal service offering for members of the public.

3.2 We would caution against collecting vast quantities of data in the hope that a use will be found for it. The collection and storage of data is expensive and should only be undertaken if the value in its use is greater than the cost of its collection.

### **4. (Question 3). How will it benefit the freight sector and the supply chain?**

4.1 Data standardisation and improved sharing between freight operators and public sector bodies would enable local authorities to better plan for the needs of the freight sector in all their activities, including facilities such as lorry parks and services for freight and logistics drivers and operators. It would also enable better planning for the installation of more electric recharging, biofuel and hydrogen refuelling locations on the operators' most common routes. This will support the decarbonisation of the emissions from the sector by supporting the uptake of electric or hydrogen freight vehicles.

4.2 Better use of data offers the potential to improve efficiency and reduce both operating costs and carbon emissions through improved routing, reductions in empty running. There is a recognised issue of commercial confidentiality with freight operators not sharing data with central or local government because they do not want it shared with their commercial competitors. This issue would be best addressed through the development of a national freight data strategy led by the Department for Transport. It is disappointing that the Freight Mapping

Tool Discovery pathfinder study undertaken for the Department for Transport in 2020 has not led to further work on the creation of a national freight data hub.

4.4 Better data availability would allow Network Rail to plan for more freight paths, encouraging modal change and decarbonisation of the freight sector. It would also support planning authorities to take better account of where there is a need for additional road /rail interchanges and warehousing facilities.

4.5 Better data collection from the operators and sharing between them and local and central government would also facilitate the creation of the National Freight Network.

4.6 The lack of accurate operator data is also a barrier to being able to accurately quantify the value of freight, particularly rail freight, as demonstrated in Deloitte's report "Assessing the Value of Rail Freight" carried out for the Rail Delivery Group and published in April 2021.

## **5. Question 4. What are the potential uses of data for understanding usage and condition of assets like roads, rail track, charging points, vehicles and the kerbside?**

5.1 Data can be used to understand peoples travel patterns and how these change over time. Combining data from traditional and emerging datasets, like mobile phone data, will enable a clearer picture of these changes to be developed. No dataset will give all the answers and the likelihood is that a combination of different datasets will be needed. Data collection must be conducted before the implementation of changes. This must be followed up during and after interventions are completed to understand their impacts and implement any lessons learned on similar schemes in the future.

5.2 Data can give insight into asset degradation and inform efficient maintenance. A good asset management system (not an IT system but a management system) that delivers effective maintenance with accurate effective data will deliver greater benefit than data alone.

5.3 Data requirements should be defined through a detailed understanding of the needs of all internal and external stakeholders including internal and customers. These requirements should not only define what data is required but also specify requirements for quality, which should include:

- Accuracy – the data is a true reflection of what it represents.
- Completeness - a complete set of data is available for each data record.
- Consistency – data is consistent in its definition, rules, format & value.
- Validity - all data held complies with data storage rules.
- Timeliness – Data reflects the current state and complies with organisational standards for data update timescales.
- Uniqueness - No duplication of data.

5.4 As Building information modelling (BIM) becomes more commonplace and data is more readily available accurate and appropriate digital twins can be developed for technical infrastructure. This will allow both risks and efficiency to be managed in alignment with the asset owners' objectives. BIM is a process involving the generation and management of digital representations of the physical and functional characteristics of places. BIMs are computer files (often but not always in proprietary formats and containing proprietary data) which can be extracted, exchanged or networked to support decision-making regarding a built asset. BIM software is used by individuals, businesses and government agencies who plan, design, construct, operate and maintain buildings and diverse physical infrastructures, such as water, refuse, electricity, gas, communication utilities, roads, railways, bridges, ports and tunnels.

## **6. (Question 5). What privacy, ethical, security, resilience and intellectual property issues arise in relation to gathering and sharing transport data, including location-based data about journeys and data with commercial value? How should the Government seek to manage and regulate these?**

6.1 Transport data should be compliant with GDPR and commercial law to protect data privacy. Care must be taken to ensure that transport trends are aggregated to an appropriate level to ensure that individuals travel patterns cannot be implied

6.2 Consideration must be given to privacy and security when planning data collection to be shared widely across various groups. If data includes sensitive or private information then its suitability for open access will require evaluation. Organisations that are going to collect and or use personal data must ensure that they have adequate security across their network and consider the consequences of any security breach in order to put the required measures in place to secure it.

## **7. (Question 6). What are the biggest gaps in available data about transport networks and travel? What kinds of policy, planning or maintenance questions cannot currently be answered that we could answer with new, or more accessible, data?**

7.1 There is currently a data gap in understanding whole life carbon of transport schemes at a network level including the carbon reduction/increase of mode shift as a result of new infrastructure.

7.2 There are some issues regarding access to and relevance of available datasets. For example, census data from 2021 is limited due to the Covid 19 pandemic. Alternative data sources that can provide similar information regarding travel patterns need to be considered to maintain good decision making. We would like to see this data sourced centrally on a national scale and then shared with stakeholders to assist with consistent decision making in the

aftermath of an extraordinary period. We feel it is important to consider how we can best support our decision makers without additional cost to them.

7.3 There is already a vast amount of transport data available, likely more than can be used. With increased connectivity of devices and the reducing cost of hardware and software there is a rapid increase in the data produced by the Internet of Things (IoT). Devices, vehicles, buildings and other items with network connectivity that allow them to collect data and share it with each other. This is resulting in exponential growth in the amount of data being generated.

7.4 Access to data rather than data availability is a core concern to enable the delivery of effective and integrated transport services. Data infrastructure is often unreliable, inaccessible, siloed or is not freely available. If our data infrastructure remains restricted it will stifle innovation, decisions around services will be biased based on information available and representation will be unequal. The availability of open data should be a priority to help make better investment and personal travel decisions. In order to achieve this private sector transport providers, central government and local transport authorities will need to open up more data. Currently data is not being shared in the transport sector due to concerns that shared data could lead to breaches in privacy, security and safety. A belief that the costs of sharing data outweigh the benefits; and focus by organisations on their own mode of transport, limits opportunities to better integrate services to the benefit of the travelling public.

7.6 The costs of collecting and sharing data can be prohibitive. Issues including ownership, licensing and revenue sharing need to be resolved before data can be shared. Adding consideration that real value is attained from combining multiple datasets to gain insight but the difficulty and cost of attaining and sharing these data sets often prevents this. Data owners find it hard to justify the time and cost required to make data shareable. Where data is sourced from third parties' costs can be even greater due to licencing conditions and the need to unpick or disaggregate the data.

## **8. (Question 7). How can the UK scale up from pilots, pockets of innovation and existing single-mode data sets towards an integrated, comprehensive landscape for transport data?**

8.1 Data requirements should be considered at the earliest stages of any project to identify why it should be collected what can be collected, how it should be collected and how much this will all cost.

8.2 To assist organisations, we would support creation of a national data portal that all asset owners, all levels of government and stakeholders have access to. If data were available that would enable them to run their own queries and use the data to suit their business needs from a single source of the truth this could

support greater innovation of data use as the burden of collection and storage would be removed.

8.3 The creation of funding pots to take forward and scale up successful data pilots could stimulate innovation in the private sector and encourage public bodies to consider innovative data solutions to their transport needs.

## **9. (Question 8). How should data availability, and sharing by transport operators, suppliers and other bodies, be encouraged, facilitated and regulated?**

9.1 If not centralised, government should specify data parameters that must be submitted at specified intervals and made available through the DfT or standalone web portal.

9.2 Cost of collection and reporting must be considered by government and funding increased for public bodies that will be expected to participate in the collection and reporting of a data as part of any national data repository. Improvements in the availability, and sharing of data by transport operators, suppliers and other bodies would be improved through better funding.

9.3 Data sharing would be encouraged if individual data controllers did not need data sharing agreements for each individual project they work on. Central government could reduce this barrier by having an overarching data sharing agreement that is agreed by any data controller signing up to the national portal (or similar).

## **10. (Question 9). What skills and capacity do operators, infrastructure providers and local transport authorities need in order to manage their own data well and get the most value out of available data? What help do they need to anticipate and cater for future requirements?**

10.1 Improved specification of what data is required, how it should be collected and how government would like to receive it would support all of the listed users. The skills needed would need to be defined as organisations set out their data management policy and strategy in alignment with their internal and external requirements.

10.2 Data should be considered as an asset and assessed in the same way in terms of its value to an organisation as other capital assets. Organisations need to understand the value and limitations of any data they hold or plan to collect. The same data can be interpreted differently to give different answers to the same questions. We welcome this question and recognition that the skills and capacity of these groups is a consideration. How data is interpreted to inform knowledge is often more important than the data itself.

10.3 We are concerned that without relevant skills and management systems for data, a lot of effort may be spent collecting data that has limited value or that it will not be best utilised.

## **11. (Question 10). Is the UK's digital infrastructure sufficient to allow the greatest value to be derived from transport data?**

11.1 The UK needs to rollout better mobile internet and high-speed broadband connectivity to deliver the greatest value from transport data. A standard level of service across the country is needed to enable data collection and use from remote rural to urban high demand areas. We believe that poor connectivity in remote areas limit the possibilities to provide technology driven transport solutions e.g., MaaS, real time passenger information and other technologies that will become available in the future. These areas are likely the most in need of innovative transport solutions as a consequence of them being more remote than urban environments with better access to digital and physical connectivity.

## **12. (Question 11). How effectively does the Government use data in appraising and prioritising transport investment?**

12.1 We support a robust appraisal process to ensure transport investment will deliver the strategic objectives that are being sought. Whilst the recent changes to the Treasury Green Book have provided a shift in thinking, it is important to note that transport is an enabler, and so the current "Transport Assessment Guidance" (TAG) is often too narrow to fully capture the benefits of schemes, particularly when schemes are facilitating development and the provision of new homes and employment. In these cases, the use of a "Strategic Economic Narrative" to join up the traditional strategic and economic dimensions of the business cases can be useful to clearly set out the case for the scheme. This can be supplemented with additional (non-TAG) analysis and appraisal to capture the wider benefits gained by the housing and employment facilitated by the scheme, which can often differ from the more traditional definition of "dependant development."

12.3 In their response to the Green Book Review, DfT published "Capturing local context in transport appraisal: case studies" and the use of a wider range of appraisal tools and techniques such as those described in that document should be encouraged where appropriate, with those officials assessing business cases being open to considering these alternative assessments. Decision makers should follow the principles of the Green Book revisions and need to be made aware of the entirety of the 5-case business case, and the wider benefits and not overly focus on just the benefit cost ratio (BCR) within the economic case.

**13. (Question 12). What milestones and ambitions should the Government set in this area? How effectively has the Government's Transport Data Strategy identified barriers to sharing and getting value from transport data, and the actions needed to overcome those barriers?**

13.1 We recommend creation of national tools for LTAs to use that will assist them with the development of local transport plans etc. This can then be fed from a single 'source of the truth' across LTAs nationwide. Workshops should be held to work out how to get the most value from data and review what is and isn't providing value.

13.2 We recommend centralising the data through a national repository that provides value to be shared with all. If left to industry and LTA's, the risk is that data collection and sharing will continue to evolve independently with the result that data sets will be difficult to share and compare. In addition, incorporating data collected by others will continue to be time consuming.

13.2 Some barriers are identified in the Transport Data Strategy but there is no guidance on how to overcome them.

**14. Question 13. What is the emerging best practice internationally, in terms both of developing standards and frameworks for sharing and using transport data, and supporting specific innovations? How does the UK compare, and how can it help to shape international standards?**

14.1 TfSE do not have any comment to make in response to this question.



# Freight and logistics and the planning system: call for evidence

## Introduction

Thank you for responding to our call for evidence on the effectiveness of planning and engagement with the freight and logistics sector.

Closing date is 6 October 2023.

## View all the questions

This survey provides questions based on user choice, a [full copy of the questions is available \[opens in a new window\]](#).

## Print or save a copy of your response

At the end of this questionnaire, you have the chance to either print or save a copy of your response for your records. This option appears after you press 'Submit your response'.

## Save and continue option

You have an option to 'save and continue' your response at any time. If you do that you will be sent a link via email to allow you to continue your response where you left off.

It's very important that you enter your correct email address if you choose to save and continue. If you make a mistake in the email address, you won't receive the link you need to complete your response.

## Accessibility statement

Read our [accessibility statement for SmartSurvey forms \[opens in a new window\]](#).

## Confidentiality and data protection

The Department for Transport (DfT) and the Department for Levelling Up, Housing and Communities (DLUHC) as joint controllers are carrying out this consultation to gather evidence on the interaction between the freight and logistics sector and the planning system in England.

You can access [Our DfT online form and survey privacy notice \[opens in a new window\]](#) and [DHLUC's privacy notice \[opens in new window\]](#) for more information on how your personal data is processed in relation to this survey.

In addition to the information mentioned in the privacy statement we are additionally asking:

of individuals their previous sector experience  
of organisations:

- your personal position in your organisation
- the description of the organisational type
- and for certain bodies, the employee size of your organisation

Personal details

## 1. Your (used for contact purposes only):

name?

email?

## 2. Are you responding: \*

X on behalf of an organisation?

Organisation details

## 3. What is the name of your organisation?

## 4. What best describes your personal position in your organisation?

Chief Executive

Director

Senior Partner

Specialist

Engineer

Lawyer

Planner

X Another position:

## 5. What best describes your organisational type?

X Local or regional government body

Business size

## 6. What is the employee size of your organisation?

X 1 to 25 employees

26 to 50 employees

51 to 100 employees

101 to 250 employees

251 to 1,000 employees

Above 1,000 employees

Individual details

## 7. What sector or sectors do you have experience been in?

Planning

X Freight and logistics

X Another sector of work:

Strategic transport planning

## Introduction

TfSE welcome this inquiry by the DfT and DLUHC into the relationship between the freight and logistics sector and the planning system, and specifically to assist Government understanding into where the planning system can appropriately support the freight and logistics sector, alongside the practical issues that arise within the system when planning the right infrastructure to do . We trust that our response to the questions posed below provide value to the DfT and DLUHC.

This is a draft officer response that will be presented to the TfSE Partnership Board on 30<sup>th</sup> October 2023 for them to agree. A further iteration may therefore follow.

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 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.

### Strategic Investment Plan

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 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.

### **Freight, Logistics and Gateways Strategy**

The TfSE area is the Gateway to UK Economy, with eight major ports including Dover, Thamesport, Southampton, Newhaven, Eurotunnel, Gatwick Airport, and although Heathrow airport and London Gateway are just outside our area they have a significant impact on the economic activity and roads and rail networks within it. Between them, our international gateways and transport networks move approx. 76 million tonnes of freight which is 16% of the UK.

We published our Freight, Logistics and Gateways Strategy in June 2022 through which we aim to address the challenges faced by the freight & logistics sector in our area, namely: road network congestion, decarbonisation including the need to encourage modal shift from road to rail; the potential for expansions at Heathrow, Gatwick, Dover and Southampton; lorry parking and driver welfare; the provision of freight infrastructure e.g. warehousing and distribution centres; and improving the public sector's knowledge of how the freight and logistics industry works to better address its needs. The Strategy lays out a series of key actions in the short, medium, and long term to mitigate these challenges between now and 2040 aiming to:

- Enable sustainable economic growth for the freight and logistics sector and across the TfSE area
- Ensure goods can be safely, reliably & efficiently delivered
- Minimise air pollution and carbon emissions
- Provide the evidence we need to make the case for more infrastructure investment in key areas, including that related to collaboration and innovation and
- Develop buy-in from all sectors of the freight industry and public sector to ensure improvements are delivered.

## **Our Approach**

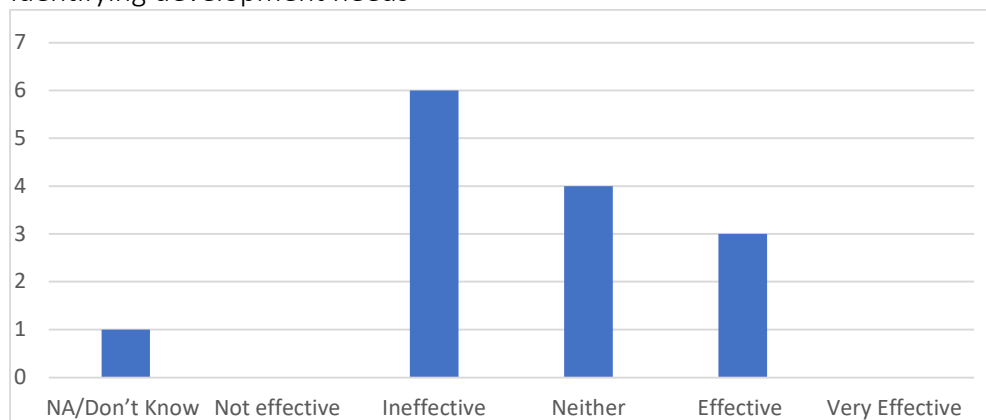
To inform and shape our response, we conducted an online 2-hour workshop on Wednesday the 13th of September with over 25 local authority (LA) planning and transport colleagues from across the region. This included representatives from Epsom and Ewell, Slough, Spelthorne, Ashford, Portsmouth, Southampton, Runnymede, Dartford, Hampshire, West Sussex, Woking, Lewes-Eastbourne, Elmbridge, Kent, Surrey, Swale, Wealden, Brighton and Hove and East Sussex. In addition to the workshop, we held three 1:1 discussions with LA representatives (Dartford Borough Council, Kent County Council, and Brighton and Hove City Council) on the 19th of September to ascertain more detailed information surrounding some of the questions. We have collated and presented our response to the Call for Evidence below.

# Local plan making and land availability

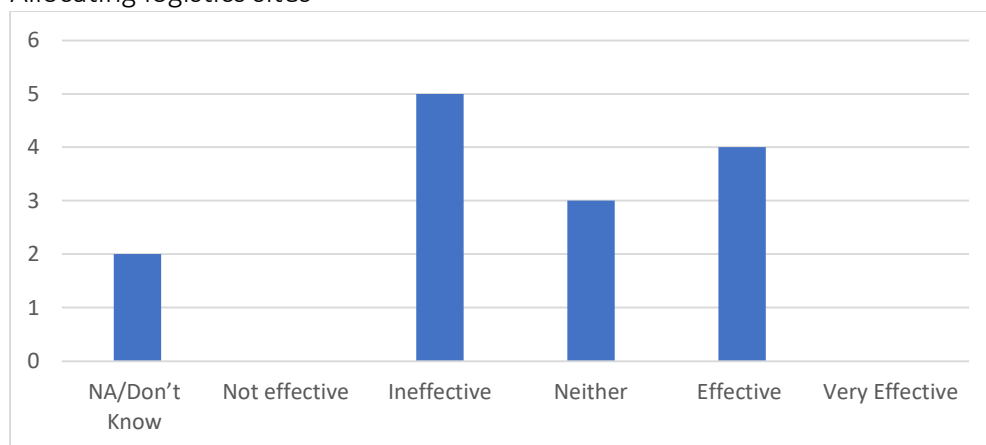
## 8. In your view, how effective are local plans at identifying development needs, and then allocating sites, for freight and logistics?

At our online workshop with LA planning and transport colleagues from across the region, we asked the two parts to the question separately:

Identifying development needs



Allocating logistics sites



## 9. Why do you think that and what evidence do you have for your viewpoint?

### Identifying development needs:

With freight and logistics traffic being the result of multiple origins and multiple destinations, into, out of and through our region, Local Planning Authorities (LPA) and Local Transport Authorities (LTA) do not have easy access to data about freight flows to understand the freight and logistics needs within their area.

Through discussion, it appears that the lack of recognition comes from a lack of evidence base for commercial land use in general, and freight and logistics in particular. There is a lack of engagement between the freight and logistics sector and local authorities for a variety of reasons (see answers provided to questions 14 – 16), resulting in a limited understanding of the local needs of the sector. This can be complicated by land promoters, either the land owners/agents or property development companies, who often do not fully understand the infrastructure needs of new developments, and where potential freight and logistics occupiers are likely to be unknown at the Local Plan Planning stage.

To plan effectively local authorities need data. The freight sector holds data that could provide insights into their needs but are unable to share it due to commercial confidentiality. Collecting and interpreting specific local data is expensive to undertake and is likely to require investment over several years to provide a clear evidence base. Even if such data was collected, any resultant dataset may still be unclear as to longer-term freight and logistics needs as the freight and logistics industry is highly flexible and adapts rapidly to respond to customer needs and therefore the accuracy of this data may not remain consistent over time. Additionally, rapidly evolving technology, innovation and changes in delivery patterns post Covid-19 also make it difficult to obtain consistent and up-to-date data, unless it comes from a single source. For example, there is a lack of evidence to understand any demand for consolidation hubs within industrial estates or on existing or redundant retail sites.

Identifying development needs appears to be easier if a larger area is addressed, a good example of which is the Partnership for South Hampshire. The Partnership LPAs commissioned a study on forecast logistics land demand to inform a Statement of Common Ground between LPAs in the area which can be found [here](#). This study appears to be reasonable and suggested a fairly limited demand for 'big box' major distribution sites, and that identifying further land allocations particularly for large warehouses next to strategic road network (SRN) is a relatively minor part of subsequent work to develop a new spatial strategy to inform local plans across the area.

#### **Allocating logistics sites:**

Within the TfSE region there appears to be a better understanding of the allocation of freight and logistics sites. However, our discussions identified several reasons that can limit site allocation:

- The presence of the South Downs National Park and numerous AONBs limit available sites for many uses, including freight and logistics around the edges of coastal urban areas
- Many sites that come forward outside urban areas are deemed too small for freight and logistics requirements
- Logistics sites may be pushed out by higher value land uses (e.g. employment). This is particularly true within urban areas where last mile logistics hubs could reduce the impact of freight and logistics traffic
- The specific type of freight and logistics uses: e.g. HGV parking versus distribution centre sites versus waste transfer

- Limited sites are available next to the SRN and the capacity of highway infrastructure to any potential site may be very limited. This makes the allocation for alternative uses easier, e.g. residential, especially if housing requirements for the LPA are high relative to available land

To alleviate some of these issues LPAs suggested they may allocate mixed use sites, leaving it to the market to decide. Interestingly, Dartford Borough Council identified that brownfield areas and sites that already had outline planning permission had been easier to develop, as there had been less objection to the outline proposals and when detailed planning permission was sought, the Council could press harder for what it wanted due to the scarcity of similar sites available. One of the most recent example developments has been Amazon (planning reference DA/19/01515/FUL) where Amazon has provided an intensified bus service for staff to and from the site.

## 10. How, in your view, could the effectiveness of local plans at identifying development needs, and then allocating sites, for freight and logistics be improved?

The effectiveness appears to be improved if a larger area is addressed, or where the LTA & LPA collaborate more closely. The allocation of freight and logistic sites in liaison with the LTA will ensure consideration is given to road classification to access the site.

Currently, to fully understand the freight and logistics industry's needs requires the industry to engage in the plan-making process, something which seems to be lacking (see answers to q14 – 16). Better information could come from additional engagement between LPAs and the industry or through the availability of regional or national databases. Alternatively, a greater national or regional clarity on spatial need could improve the identification of freight and logistics development needs.

There is also a need for guidance on the methodology for articulating this need for freight and logistics developments and on what evidence should be available to the LPAs and/or evidence they should gather to judge the effectiveness of proposals. This would provide LPAs with the tools to recognise and plan for the right balance between 'big sheds' and 'last mile' facilities, and everything in between.

Finally, local plans need to consider freight and logistics requirements for all land uses, including residential, from a construction as well as occupation point of view.

## 11. Overall how effective are the national planning policy and associated practice guidance in supporting the needs of freight at the plan making stage?

Very effective

- Effective
- x Neither effective nor ineffective
- Ineffective
- Very ineffective
- Don't know
- Not applicable

We did not ask this question directly at our workshop, but the discussion provided some useful information, suggesting an overall view that it is neither wholly effective nor wholly ineffective.

## 12. Why do you think that and what evidence do you have for your viewpoint?

An ideal freight and logistics site would have easy access and good highway connectivity, and this is supported in national planning policy. However, there is an issue with policies pushing or rigidly requiring new sites to have direct access to the SRN, as it is arguably too high a bar given the land values and the viability of funding those links. For example, some proposed sites in Kent that are very close to the SRN but would require short local road journeys to a nearby junction have been refused (although there may have been other reasons behind the decision).

There is a shortage of land available as large areas of the region are designated as protected landscapes. In addition, many LPA and LTA areas within the TfSE region that host available sites near to existing highway and rail infrastructure are likely to be small and constrained. This makes the potential locations unsuitable as safe access is not possible.

## 13. How, in your view, could the effectiveness of the national planning policy and associated practice guidance in supporting the needs of freight at the plan making stage be improved?

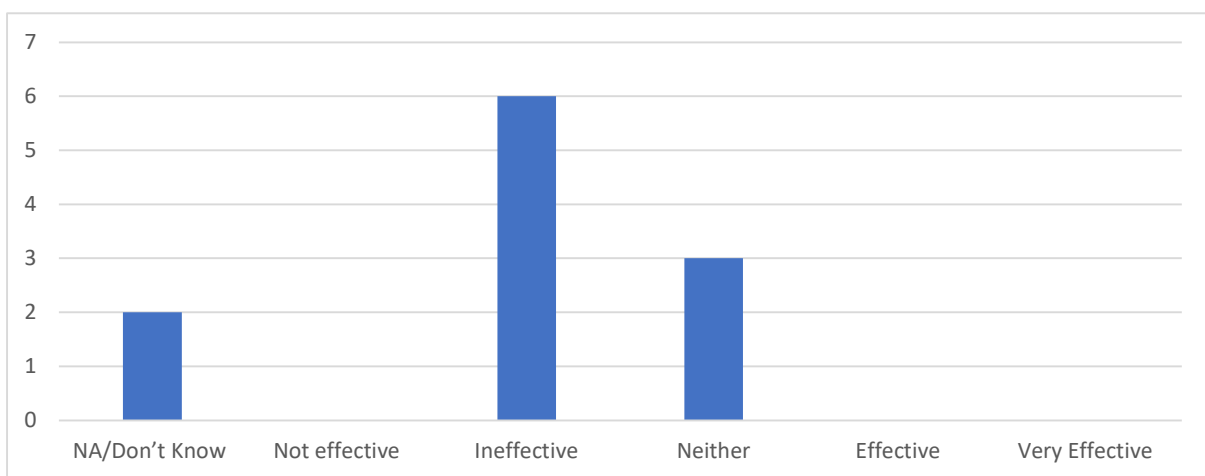
The NPPF currently provides very limited guidance on freight and logistics, proposing that new developments should “allow for the efficient delivery of goods”. However, the NPPF should encourage the local context for freight and logistics needs to be considered through the development of freight strategies as part of local transport plans (LTPs) and guidance on this should be provided. These strategies should cover larger freight movements to and through an LTA area, as well as the local delivery and servicing requirements. This would ensure that changes to last mile deliveries are given due consideration at a strategic level in the LTP and any Local Plans, and could link ‘Travel Hubs’ with delivery facilities, such as currently being developed in Southampton through the Transforming Cities Fund programme.



The NPPF currently states that policies and decisions should consider lorry parking, but it was suggested that it should be strengthened to “must consider lorry parking”, to encourage the provision of sufficient lorry parking to a suitable standard.

## Local plan-making and land availability

### 14. How effective do you think is the engagement between industry and local authorities in the course of local plan-making?



### 15. Why do you think that and what evidence do you have for your viewpoint?

Engagement is currently ineffective between local authorities and the freight and logistics industry in the course of local plan-making. Engagement mechanisms for how the freight and logistics sector can input into the local planning process are unclear, resulting in inconsistent or late responses which impacts the extent that the results can inform local plan applications. When public consultations have been held, response from the industry has been limited due to a lack of LA awareness about who to engage with (e.g. due to the diversity of the sector potential freight operators are unknown or hard to identify). A low industry response rate to consultation could also be a result of misalignment between the freight and logistics industry planning and local plan making timeframes, as the industry is concerned on a short term site-by-site basis and day-to-day business, rather than the longer term wider strategic vision.

Engagement that does take place is predominately with the two biggest freight and logistics trade associations (Logistics UK and Road Haulage Association) rather than with individual local freight and logistics operators or the freight property sector. Additionally, as a private commercial activity, freight and logistics operators respond to their business customers, and (with a few exceptions for local ports or Business Improvement Districts) there is also limited engagement with local businesses. Ultimately, an association or forum of freight and logistics

companies, businesses with some knowledge of the local planning system and LPAs, would be beneficial, providing a means for LPAs to increase the levels of industry engagement.

Relationships with LPAs and the freight and logistics industry are much less well developed than with other sectors (e.g. public transport) which is further emphasised by a lack of resource and knowledge in the LPAs and, more widely, within LTAs. Other transport modes have been historically prioritised for capability or capacity funding; however limited opportunities have been presented for freight. Currently, no LPA or LTA has a dedicated freight officer, with freight issues only being considered on an ad hoc basis when it is absolutely necessary. In parallel, there is a lack of understanding about the demands from the freight and logistics industry, in relation to the road network, or clarity from the NPFF on typical sector needs at a strategic or local level. As a result of this, projects have taken a longer time to progress e.g. one LA was starting to trial sustainable last mile/local hubs projects but has been hindered by a lack of knowledge and experience, especially in the LPA, and a requirement to submit a full planning application.

Currently, not all LPAs have local plans that have policies addressing freight and logistics sites need and therefore there is a need for the industry to engage with and demonstrate how they can work with the LPAs in order to ensure that their needs are considered and to recognise the value of working with the public sector. It was acknowledged that site justifications for warehousing or freight and logistics facilities can be challenging as there can be reluctance from politicians to support what are perceived as low skilled jobs and negative local impacts, such as air quality issues and informal lorry parking.

There is a lack of a clear regional planning perspectives to coordinate and gather evidence, and to define the role of LTAs within the freight and logistics industry. Currently, LTAs participate in the engagement between the LPAs and the industry and therefore struggled to provide comments on this question.

## 16. How in your view, if at all, can this engagement be improved?

It was suggested that dedicated and targeted engagement could be conducted between local authorities and the freight and logistics industry, to better develop connections with representative freight bodies (e.g. Logistics UK, RHA and business groups), awareness of local issues and understanding of the needs of specific groups (e.g. cyclists). For example, Southampton has recently launched a new master planning forum which is focused on future growth aspirations in the city. The forum includes businesses such as the Port of Southampton (Associated British Ports) and Go! Southampton (the local Business Improvement District) who will both be important partners going forward.

Local authority engagement should ensure that freight and logistics representatives are engaged with as local strategies develop (e.g. local plans and LTPs). It was highlighted that representative freight and logistics bodies could be better resourced to respond to these engagement requests at a localised level, although it was acknowledged that competing

demands within organisations and their resources could hinder this. Alongside the master planning forum, Southampton has a Workplace Travel Network, which engages key businesses across the city on transport matters. Encouraging the inclusion of freight and logistics organisations into groups such as these would be a first step into their inclusion within local policy making.

## 17. How effective do you think planning currently is in supporting more efficient use of freight and logistics infrastructure?

TfSE has no comments to make in response to this question.

## 18. Why do you think that and what evidence do you have for your viewpoint?

N/a.

## 19. How, in your view, could the effectiveness of current planning be improved to better support more efficient use of freight and logistics infrastructure?

Some LTAs suggested that a regional understanding of existing freight and logistics infrastructure would be useful. Insights from the freight and logistics industry at the evidence gathering stage would also be very helpful here, not just when consulting on draft Local Plans

However, the largest response from both LPAs and LTAs was for a much greater understanding and awareness of the freight and logistics industry by officers. It is felt that existing planning degrees are very light on transport modules in general and freight in particular and more training for officers on freight and logistics issues would also be useful. Training was felt to be necessary for both development control and policy officers, and could be very helpful for Members.

A Good Practice Guide, with a range of practical and up to date case studies would also be welcomed.

## Statutory local transport plans sub-national transport strategies

## How, in your view, should freight and logistics be factored into statutory local transport plans and sub-national transport strategies?

There is general consensus that freight and logistics should be factored into local and sub-national transport strategies, with representatives welcoming the on-going development of sub-national or regional freight strategies. These can be used to identify preferred vehicular routes that can be applied within local plans, localised assessments to identify opportunities and constraints for the freight and logistics industry, and to ensure the regional perspective is communicated to the government so that planning policy can better address national and sub-national needs at a local level.

However, a key barrier to the industry's inclusion at present stems from several misalignments between the timelines and outputs of transport strategies and local plans including:

- LTPs and regional strategies do not need to identify or allocate sites
- Timeframes of the LPA local plan process and LTA's LTPs do not align which results in potentially outdated evidence bases being used with local plans. For instance, one LA highlighted that they were concerned as the LTA's new LTP would not be made available until after they had submitted their Town and Country Planning (Local Planning) Regulations (2012), Regulation 18 Local Plan which had used an evidence base from 2020. Therefore, when they come to submit their final local plan for Regulation 19, the evidence base may be significantly different.
- Local plan making does not yet appear to take account of carbon impacts which are increasingly driving LTPs.

These barriers are further emphasised by a lack of collaboration between some LTAs and LPAs, with limited willingness to share evidence bases and draft policies to support better alignment between local plans and LTPs. However, to ensure better representation of freight and logistics inclusion within local strategies, cross boundary collaboration between STBs, LAs, LPAs and LTAs could be improved to help mitigate political sensitivities and support increased communication and openness. Ideas included developing or improving strategic planning frameworks and joint LPA meetings with the relevant LTA.

It was highlighted that LTAs are currently not as well placed to advocate for the needs of the industry due to their policies carrying less weight than the overarching NPPF, and typically lacking 'skin in the game' as they do not operate or financially support initiatives. However, LTAs are well placed to set direction and to collaborate with LPAs to deliver consistent messaging to the freight and logistics sector. Freight and logistics needs and issues would therefore be more likely to be advocated for and included within transport strategy development as it was suggested that, at present, these issues are not often raised. This role is largely dependent on the political alignment between LTAs and LPAs, however this could be strengthened through encouraging collaboration as outlined above.

Several opportunities were also highlighted to maximise the impact of existing strategies including cross-boundary shared mobility hubs and strategic mobility interchanges (e.g. as

seen in the TfSE SIP) to encourage freight and logistics to be taken into account in all local planning.

## Planning decision taking and the applications process

### 20. In your view which aspects of the existing planning decision making process work well?

The logistics developments that work well through the existing planning decision making are those for large warehouses located off of major trunk roads and located in unprotected areas. The system also works well if there is effective collaboration between the developers and the LPA, where the developers engage in constructive pre-application discussions at an early stage.

This provides evidence for our response on engagement (Q19), demonstrating that simple engagement on one site can assist in the decision making process. It also suggests that a wider engagement with the freight and logistics industry and increased knowledge on both sides (industry and local authorities), could improve strategic planning and the quality of future relevant planning decisions.

### 21. In your view which aspects of the existing planning decision making process do not work well?

In our workshop discussions, the length of time it takes to make planning decisions was seen as a key problem. This can be for a variety of reasons including, data availability, conformance to policy, and resident reaction.

Consultations, pre-application engagement, and continuous plan amendments can all delay the decision-making process. This is further exacerbated by the length of time any appeals may take.

Freight and logistics developments are usually in urban or sub-urban locations and need to be consistent with regeneration and environmental priorities and meet wider policy objectives. Allocating sites on the edge of an urban area in a Local Plan works in theory, but the scale of buildings proposed in outline planning applications can be vast and are then likely to be difficult to manage visually e.g. due to their impact to on the entrance to a nearby town.

Speculative land development schemes where the local community are not expecting it, often lack upfront public engagement. This can result in resistance from local residents due to perceived disruption and additional HGV traffic, and is likely to result in refusal by elected members and subsequent appeals. Applicants could do much more to engage with residents to explain the proposal and any measures to mitigate HGV traffic.

Trip generation and route information can aid in LTA consideration of the application. However, the existing publicly accessible data for freight traffic to and from general residential and commercial sites, and to and from freight and logistics specific sites, is limited to the

<https://www.trics.org/> database or requires trawling through known planning applications of similar developments elsewhere.

The lack of data availability on the freight impacts of a development can be critical. For example, if a freight operator is unwilling to provide sufficient data to support the decision-making process (claiming it is commercially sensitive) and the planning committee overturn a positive officer recommendation, the result may be a costly and drawn out appeal.

Land values for freight and logistics sites mean that some existing allocated sites for employment are under threat due to pressure for housing. As a result of these competing pressures, freight and logistics frequently seems to lose out to other land needs. At present, the freight and logistics industry and their customers (both businesses and residents, possibly represented through local organisations such as Business Improvement Districts) do not appear to be organised to currently challenge this, although this may be changing gradually with changing land values, post-pandemic.

## Specific policy priorities

**22. In your view how effective is the planning system at addressing the operational needs of the freight and logistics sector?**

TfSE has no comments to make in response to this question.

**23. Why do you think that and what evidence do you have for your viewpoint?**

TfSE has no comments to make in response to this question.

**24. How, in your view, could the effectiveness of the planning system be improved to better address the operational needs of the freight and logistics sector?**

As stated in our response to Q19, the largest response from both LPAs and LTAs was for a much greater understanding and awareness of the freight and logistics industry by officers. It is felt that existing planning degrees are very light on transport modules in general and freight in particular and more training for officers in LHAs and LTAs on freight and logistics would also be useful, especially as it is a new and growing area of transport planning. Training was felt to be necessary for both development control and policy officers, and could be very helpful for elected members.

## National Freight Network

### 25. How, in your view, could a National Freight Network be recognised and supported in planning?

TfSE has no comments to make in response to this question.

## The decarbonisation of freight

### 26. How, in your view, can the planning system support our net zero ambition for freight and logistics?

The discussion identified a number of ways in which the planning system can support the net zero ambition for freight and logistics.

To support modal shift two key opportunities have been identified. The first relates to how the planning system can support zero emission last mile deliveries. For instance, the provision of delivery hubs in urban and rural areas could enable last mile deliveries via e-bikes and zero emission vehicles. The second opportunity relates to the planning approval process, and a consideration for how new logistics hubs can support access via sustainable modes of travel (e.g. bike or bus).

Ideas relating to micro consolidation, included ensuring that local consolidation facilities are provided as part of new developments; co-locating parcel collections with community facilities and/or supermarkets; and supporting the repurposing of redundant units to support micro consolidation are all under consideration. However, while the 2020 changes to land use classes have enabled some changes of use across the widened use class 'E', logistics use is often grouped as 'B2/B8' in new developments to maintain flexibility and maximise employment opportunities. Facilitating these new last-mile developments may require a further revision to the use classes or clear guidance to enable changes in land use that support the local area, for example microhubs for cargo bikes.

Zero emission vehicle charging HGV infrastructure was also proposed. Suggestions included the need for analysis to inform where charging infrastructure should be located, and a focus on hydrogen fuelling (not just EV) infrastructure.

There was also a number of proposals for the government to set national level standards (e.g. regarding HGV zero emission vehicles and charging infrastructure) and develop a national policy requirement to incorporate cycle provision when roads are upgraded where appropriate.

## Driver parking and facilities

## 27. In your view what more could local plans and decisions do to facilitate the supply of more HGV parking and driver facilities?

While the South East has a high number of HGV parking facilities, [the DfT September 2022 National Survey of Lorry Parkng](#) identified a current shortfall of 1,132 overnight HGV parking spaces within the TfSE region on sites either on or near the Strategic Road Network. A recent draft report on lorry parking by AECOM for TfSE suggests the shortfall could be 1,528 overnight parking spaces on both the Strategic and Major Road Networks.

It was clear at our discussions that not all LPAs were aware of this shortfall in lorry parking, or how to address the issue. What is clear is the need for a more strategic, cross boundary working to identify sites, especially around Heathrow and the M25. It was reported that this is a particular issue for authorities just outside the Ultra Low Emission Zone and its impact on demand for parking to accommodate non-compliant vehicles.

Issues were reported with competition for available land around existing motorway junctions. To create a lorry park with dedicated slip roads off the SRN would not be financially viable. Available land close to existing junctions off the SRN are often sold for storage, distribution or office uses which can afford these increased land values. LPAs prefer land uses that create large employment use, which a lorry park does not. This can lead to lorry parking sites being promoted in the Greenbelt where land values are much lower. However, it is much harder to achieve planning approval, an example of this was the rejection of the proposed motorway service area at Wrotham M26/M20 on the grounds that it was an inappropriate use of the green belt and Kent Downs AONB.

It was recognised that most existing industrial estates do not have provide facilities for drivers. Many freight and logistics vehicles will arrive early for delivery/collection at premises requiring the driver to take their mandatory rest period on the industrial estates, causing parking problems. Examples in Kent include Henwood in Ashford, Quarrywood in Aylesford and Eurolink in Sittingbourne.

The NPPF Paragraph 107 states 'Proposals for new or expanded distribution centres should make provision for sufficient lorry parking to cater for their anticipated use.' However, this does not make specific comment on the provision of driver facilities i.e. toilets, showers etc. Planning is subjective and therefore down to the individual planning officers to account for this in their recommendations. Also, if provided it is then down to the company operating the sites once delivered as to whether they will allow vehicles to park overnight on their site. A local example of this in Medway Borough Council is the Amazon Distribution Centre at Hoo, which has caused lorry parking problems around the access roads to the site. Another example was cited where a parking site was recommended for rejection based on the existing local plan policy as the site was zoned for employment land, however, the site development was approved by the Planning Committee.

Discussion with LPAs suggested that planning guidance could be further updated to ensure that LPAs are making adequate provision through the local plan and site allocations process,



by working with the freight and logistics industry and the sector-specific property market (e.g. land owners and agents, specialist real estate companies, and property development companies) and statutory bodies. Design guidelines for Local Plan policies for industrial sites should also include parking and welfare facilities for drivers.

## Strengthening the union

**28. In your view how can planning policy in England help to support the freight and logistics sector across the whole of the UK?**

TfSE has no comments to make in response to this question.

## Additional evidence

**29. What, if any, other evidence about freight and logistics and the planning system would you like to add?**

File: {filename}

Choose File

Uploading...

Comments:

TfSE has no comments to make in response to this question.

## Final comments

**30. Any other comments?**

In summary, the discussions we have had with representatives from both the local transport authorities and local planning authorities in the TfSE area have highlighted a number of key issues related to freight and logistics and the planning system. The main findings from this work include the following:

- There is a lack of evidence available to local transport authorities and local planning authorities about the sectors overall requirements for land which makes it difficult for local authorities incorporate these requirements into their local plans. In addition, during the planning application stage, a lack of information about potential trip generation rates and vehicle routings can inhibit pre-application discussions.
- There is clear evidence of a lack of engagement between the freight and logistics sector and local authorities, resulting in a limited understanding of the needs of the sector which manifests itself in limited provision for these needs in local spatial and transport plans. This could be addressed through dedicated and targeted engagement between local authorities

and the freight and logistics industry, for example establishing local freight forums to facilitate this.

- It is evident that there is a need for more NPPF guidance on the methodology for articulating the need for freight and logistics developments and on the evidence that should be available to the LPAs and/or evidence they should gather to judge effectiveness of proposals. There was also a general consensus that freight and logistics should be included in local and sub-national transport strategies, with representatives welcoming the on-going development of sub-national or regional freight strategies. There should also be better coordination between the local spatial and local transport planning process, particularly in relation to their timing, and improved communication between local authority planning and transport officers when developing their respective plans.
- The current planning system works more effectively where there is meaningful engagement between the developers and the LPA. Wider engagement with the freight and logistics industry and increased knowledge on both sides (industry and local authorities) would improve strategic planning. The planning application process for freight and logistics sites works more effectively where developers engage in constructive pre-application discussions.
- With better guidance and more informed officers the planning system could support the government's net zero target better through, for example, allowing better provision of delivery hubs in urban and rural areas that enable last mile deliveries via e-bikes and zero emission vehicles. Also this should promote the need to give better consideration for how new logistics hubs can support access via sustainable modes of travel (e.g. bike or bus) at the planning approval stage.
- Regarding lorry parking and driver welfare facilities, it was not clear from the discussions that LPAs were aware of the lack of lorry parking sites, or how to address this. Some key issues were identified, for example, competition for available land around existing motorway and SRN junctions, with these often sold for 'higher value' storage, distribution or office uses. Again, lack of guidance was identified as part of the problem because the NPPF does not specify anything about the provision of driver welfare facilities at lorry parking sites.
- The biggest challenge during the discussion sessions was the lack of professional or on-the-job training for local authority officers on the needs of and issues faced by the freight and logistics sector.

To address some of the key issues raised above, TfSE would support improvements in both the NPPF and LTP guidance. The recently updated NPPF (published on 5th September 2023) provides only very limited guidance on freight and logistics. The NPPF strengthens the requirement for local planning authorities to take into account the regional transport strategies and local transport plans in relation to freight and other transport matters as this may provide beneficial outcomes for users, businesses and communities. It should also encourage the consideration of the local context for freight and logistics through the development of freight strategies as part of LTPs. These strategies should cover large freight flows and the wider regional requirements; movements from, to, and through an LTA area; the local delivery and servicing requirements for businesses and residents to support the local economy; and wider lorry parking guidance that includes the provision for driver welfare facilities.

The LTP guidance, which is under development, could also support the development of such strategies by outlining the freight issues local authorities need to consider in the development of their local plan and providing examples of possible solutions and appropriate actions and policies. LTP guidance should also promote more engagement with the freight and logistics industry and more collaboration between LPAs and LTAs to support the freight and logistics industry, and encourage safer, cleaner and more efficient delivery and servicing activity on our streets.

The guidance should certainly include consideration of rail connected sites and local logistics locations that have wider regional strategic importance; lorry parking and the provision of driver facilities; and the development of local logistics hubs and pick up and drop of sites (e.g. locker banks) to enable zero-emission deliveries.

## Introduction

Our responses to the consultation questions from the online form can be found in appendix 1. The appendix contains a response in the same format as the online form including the questions.

TfSE is a sub-national transport body (STB), 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, National Highways, Network Rail and Transport for London.

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.

In 2020 TfSE published a thirty-year Transport Strategy for the south east that sets out an ambitious 2050 vision for the area. We have undertaken a programme of area studies to identify multimodal packages of interventions that will be needed to deliver the Transport Strategy.

This led to the publication of our Strategic Investment Plan (SIP) to help both government and LTA's prioritise investment in our region. The packages detailed in the SIP address eight investment priorities aligned with the vision and strategic goals of the TfSE Transport Strategy and the wider regional and national policy context. It provides a framework for investment in strategic transport infrastructure, services, and regulatory interventions in the coming three decades.

The SIP represents the culmination of five years of technical work, stakeholder engagement, and institutional development. It 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, cross-boundary interventions.
- Assess the impact of proposed interventions on transport and socio-economic outcomes.
- Prioritise the interventions that best address the south east's most pressing challenges and unlock the south east's most promising opportunities.

Portsmouth City Council (PCC) are one of our key partners and are represented on our Partnership Board, as well as having been engaged as stakeholders throughout the development of our technical work programme. PCC will be key in helping us to deliver the vision set out in our Transport Strategy and SIP.

TfSE welcome the opportunity to comment on the Portsmouth draft parking strategy. In general, we welcome the content and are happy to see the alignment with our work.

We would be happy to discuss any of the feedback in our response, and the opportunities for further collaboration.

This is an officer response. The TfSE Partnership Board next meets on 30 October 2023 when it will consider this response. A further iteration of it may follow that meeting.

Yours sincerely

A handwritten signature in black ink, appearing to be 'Rupert Clubb', with a stylized, cursive style.

Rupert Clubb  
Lead Officer  
Transport for the South East

## Appendix 1

### 1. In what capacity are you responding to this consultation?

- As a resident of Portsmouth
- As a visitor to Portsmouth
- As someone who works in Portsmouth
- A Portsmouth student
- Business/ organisation

### 2. What is the name of the business/ organisation you are responding on behalf of?

Transport for the South East

### 3. And what is the postcode of the business/ organisation?

BN7 1UE

Prev

### Question Title

4. To what extent do you agree or disagree that these three objectives are the right ones? We will give you the opportunity to tell us more about your answer on the next page.

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

### 5. Do you have any comments to make about the draft strategic objectives?

The strategic objectives outlined in Portsmouth City Council's (PCC) Draft Parking Strategy are aligned with the vision set out in TfSE's Transport Strategy and Strategic Investment Plan (SIP) which is underpinned by three strategic goals:

#### **Economic:**

Improve productivity and attract investment to grow our economy and better compete in the global marketplace.

#### **Social:**

Improve health, safety, wellbeing, quality of life and access to opportunities for everyone; and

#### **Environmental:**

Protect and enhance the south east's unique natural and historic environment.

**6. To what extent do you agree or disagree that these three policies are the right ones to achieve objective 1? We will give you the opportunity to tell us more about your answer on the next page.**

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

**7. Do you have any comments to make about the draft policies for objective 1?**

TfSE support the expansion of the Portsmouth Park and Ride to make it the primary parking choice for commuters, shoppers, and visitors. We have ourselves identified development of Tipner Transport Hub (M275 Junction 1) including park and ride, bus services and active travel options in the SIP. We believe this will provide opportunities for efficient multi-modal journeys, at the same time facilitating major regeneration opportunities in the city.

TfSE have also identified 2 further schemes in the PCC area aligned with the proposals set out in the draft parking strategy which are:

- Cosham Station Mobility Hub
  - To provide interchange between private car, public transport, active travel and other transport modes to improve end-to-end journey quality.
- Southsea Transport Hub
  - Enhanced coastal defence works; improvements to the public realm; and measures to encourage modal shift to public transport and active travel in the Southsea area.

Exploration and implementation of sustainable parking initiatives to enable city centre development is also aligned with TfSE's Transport Strategy and SIP. Prioritising sustainable travel choices is the best way to enable mode shift and completing this in a way that will not detrimentally affect businesses and the economy in Portsmouth is a sensible approach while also collecting quality data to enable better decisions in the future.

In the TfSE Transport Strategy we set out initiatives that will help address local journey challenges including a need to improve the management of the supply and cost of car parking in urban areas to encourage modal shift to more sustainable forms of transport. PCC's proposals support this view and will address the challenge of conflicts between different modes and user types, particularly vulnerable users and people with reduced mobility in urban areas, while improving air quality and road safety on urban corridors that serve local journeys.

The approach of reviewing different areas independently to tailor solutions is a logical approach that we also support.

**8. To what extent do you agree or disagree that these three policies are the right ones to achieve objective 2? We will give you the opportunity to tell us more about your answer on the next page.**

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

**9. Do you have any comments to make about the draft policies for objective 2?**

The use of smart parking applications was identified in the TfSE Transport Strategy as a positive method of providing consumers with information and app-based payment functions to reduce the traditional problems associated with finding and paying for parking.

We support the consideration of flexible use of kerbside space and it aligns with our Strategy and the need to consider planning for people and places. An integrated approach to land use and transport planning can support future housing, employment and regeneration needs sustainably and change with trends and consumer need.

**10. To what extent do you agree or disagree that these two policies are the right ones to achieve objective 3? We will give you the opportunity to tell us more about your answer on the next page.**

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

**11. Do you have any comments to make about the draft policies for objective 3?**

TfSE agree with and support PCCs draft strategy encouraging active travel and sustainable mode shift. Aligned with TfSE's Strategy and SIP, we also believe that networks promoting active travel and active lifestyles can improve residents and visitors' health and wellbeing and support improved air quality while also acting to reduce congestion and encourage further shifts to public transport.

TfSE support the consideration and proposal of non-residential parking restrictions and a potential workplace parking levy in Portsmouth from which any money raised would be put back directly into funding further improvements to public and sustainable transport. In the TfSE SIP we identified 6 Global policy interventions designed to address the challenges and opportunities that affect the whole of the south east and the wider UK. These include existential challenges such as global warming and opportunities including new mobility technologies, providing an increasing variety of ways to travel and access transport opportunities beyond traditional hire or ownership. Under the title 1.4. Road User Charging aligned to this we feel it is important that local authorities also have the opportunity to investigate workplace parking levies and Low Emission Zones in their areas where appropriate. An example can be found in

**0300 3309474**

**[tfse@eastsussex.gov.uk](mailto:tfse@eastsussex.gov.uk)**

**[transportforthesoutheast.org.uk](http://transportforthesoutheast.org.uk)**



Transport for the South East, County Hall,  
St. Anne's Crescent, Lewes, BN7 1UE



Nottingham, where a Workplace Parking Levy raises funds for the local authority to contribute towards financing a new tram system and redevelopment of the conventional rail station.

**12. Do you have any further comments to make about Portsmouth's draft Parking Strategy?**

**13. What is your home postcode?**

**14. What is your sex?**

- Male
- Female
- Intersex
- Prefer to self-describe (please specify)

- Prefer not to say

**15. What is your age group?**

Emailed to: [transportplan@portsmouthcc.gov.uk](mailto:transportplan@portsmouthcc.gov.uk)

20 October 2023

To whom it may concern,

## **Portsmouth City Council's Draft Electric Vehicle Infrastructure Consultation**

I am writing to you in my role as Lead Officer of Transport for the South East (TfSE) in response to the consultation on Portsmouth City Council's draft electric vehicle infrastructure strategy.

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 Portsmouth City Council's draft electric vehicle infrastructure strategy. As you will be aware TfSE published a regional EVCI strategy for the South East in spring 2023, which sets out an aim to facilitate the continued roll out of electric vehicle charging infrastructure across the TfSE area, in an efficient and cohesive manner, through better local engagement, leadership and planning. As one of our constituent authorities, Portsmouth City 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 Transport for the South East.

We are very pleased to see that the proposed objectives and policies of the strategy evidence the need for a collaborative ethos regarding the future rollout of EV charging infrastructure. The draft objectives have many synergies with the aim and objectives set out in TfSE's regional EVCI

0300 3309474

[tfse@eastsussex.gov.uk](mailto:tfse@eastsussex.gov.uk)

[transportforthesoutheast.org.uk](http://transportforthesoutheast.org.uk)

Transport for the South East, County Hall,  
St. Anne's Crescent, Lewes, BN7 1UE



strategy. The objectives of our strategy have a focus on the need for a regional collaborative approach amongst key stakeholders in order to improve the rollout of EV charging infrastructure across the south east.

TfSE also welcomes the need for consideration of the needs of vehicle fleets when planning for the future rollout of electric vehicle charging infrastructure. This is a key objective of our regional EVCI strategy and an area of work that we are looking to progress with a matter of urgency. We have recently started the development of a methodology for projecting the uptake of electric vehicles within fleets and the associated charging demand that will emerge from public sites and depots. We would welcome the continued support from Portsmouth City Council with the development of this work to ensure that our thinking remains aligned.

In conclusion, TfSE endorses the collaborative approach that you are taking with the development of your electric vehicle infrastructure strategy. We look forward to working together with Portsmouth City Council as you continue with the development of this work, and we would be happy to discuss any opportunities for further collaboration and sharing of data to our mutual benefit.

This is an officer response. The TfSE Partnership Board next meets on 30 October 2023 when it will consider this response. A further iteration of it may follow that meeting.

Yours sincerely,

A handwritten signature in black ink, consisting of a stylized 'R' followed by a horizontal line that tapers to the right.

**Rupert Clubb**  
Lead Officer  
Transport for the South East

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, Southampton, and the six Berkshire unitary authorities.

TfSE are registering as an interested party in relation to the surface access elements of the application by Gatwick Airport Limited (GAL) for an additional northern runway.

The proposed expansion of Gatwick Airport will have significant impacts on the transport system in and around Gatwick Airport. These impacts must be addressed as part of the project.

Many of the identified improvements in the surface access strategy are already planned and committed in National Highways and Network Rail's investment programmes and should be supported these include:

- M23 widening slip roads and adding a flyover for southbound traffic accessing the airport
- M23 spur terminal roundabout re-sited to south of existing, grade separated to give separate access to existing south terminal, new terminal, and A23
- A23 realigned to east of existing south terminal, grade separated junctions to M23 spur and north terminal
- Gatwick Station redevelopment New high-level concourse with lift and escalator access from all platforms
- Brighton Main Line upgrades Various grade separated improvements including Windmill Bridge and Stoats Nest junctions, other, junction improvements and platform extensions to increase capacity and remove operating conflicts
- An alternative solution to facilitate the improvements that a smart motorway scheme would have delivered at peak periods, junctions 8-10.
- Lower Thames Crossing New Thames crossing east of London to increase road capacity.

Consideration should still be given to address approaching traffic from the surrounding road network into the A23/M23 corridor. We still have concerns that provision of safe and suitable access has not been demonstrated.

We support WSCC in their request for evidence to support the potential impact of the speed limit reduction proposed on London Road (A23) to 40mph.

Changes to highway proposals were made following GAL's Autumn 2021 consultation. However, the changes do not appear to have incorporated sufficient additional measures to make sustainable modes of travel more attractive to staff and passengers. It is not clear how they will contribute to the objectives of increasing the proportion of passengers using sustainable forms of transport from 48% in 2020 to 55% by 2030.

GAL's commitment to ensure a minimum 55% (Environmental Statement) or 60% (Surface Access Strategy Oct 2022) of passenger journeys are made by public transport is not ambitious enough. Prior to the Pandemic the airport achieved 47.8% public transport modal share in the 12 months to March 2020.

Currently the majority of journeys to and from Gatwick are made by car. This is in part due to the limitations of public transport options despite being on the Brighton Mainline. It must be ensured that GAL honour their commitments including the provision of new bus services, Improved bus connections will enable longer distance inter-urban journeys. But there must also be a commitment to increase the attractiveness of alternate modes. An undertaking for ongoing liaison with all public transport operators would increase understanding of travel behaviour and how it could be changed in the future.

The delivery of the scheme and plans for surface access must maintain a consideration of government targets for decarbonisation and how they will contribute to achieving net zero aspirations for 2050.

TfSE welcomes the reduction of additional car parking provision at the airport following their Autumn 2021 consultation to 6,570 new spaces (potential further 1,100 may be added later). TfSE still question this level of increased parking with the forecast increase in passenger movements being accommodated through investment in more sustainable forms of travel.

ES Appendix 9.9.2 Biodiversity Net Gain Statement (Doc Ref. 5.3) states that the project overall promises >20%. We would expect to see a continued commitment to biodiversity net gain as part of any new parking provision and considered as an integral part of any surface access plans for modal shift and meeting the future decarbonisation targets mentioned above.

Additional freight movements, as a result of the Northern runway, should also be considered not just within the airport boundary but in the surrounding area. Driver welfare and parking facilities should be provided or made provision for in the vicinity of Gatwick to avoid any adverse effect on surrounding local roads.

This is an officer response. The TfSE Partnership Board next meets on 30 October 2023 when it will consider this response. A further iteration of it may follow that meeting.