

## **Transport for the South East (TfSE) response to the Department for Transport's Consultation - Shaping the future of England's strategic roads.**

### **Introduction**

Our responses to the consultation questions from the online form can also be found in appendix 1 attached to this letter. The appendix contains a fuller response including to those questions which TfSE agree with and therefore were unable to submit further information in the online form.

Transport for the South East (TfSE) is a sub-national transport body (STB), which represents sixteen local transport authorities. These are Brighton and Hove, East Sussex, Hampshire, Kent, Medway, Surrey, West Sussex, the Isle of Wight, Portsmouth and Southampton, and the six Berkshire unitary authorities. Authorities are represented on the Partnership Board along with representatives from the region's five Local Enterprise Partnerships, District and Borough authorities, the protected landscapes in the TfSE area, National Highway, 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.

TfSE have published a 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; and
- 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. They are represented on our Partnership Board and the work they do 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 them.

TfSE welcome the opportunity to comment on the Initial 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 Initial Report contains a lot of good work and we look forward to continuing our relationship with National Highways to support its delivery.

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 is problematic to alignment of objectives and makes planning for people and their needs difficult.

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 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 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.

Recent experience has highlighted challenges the logistics industry face, as the UK “learn to live” with COVID-19 and adapts to new trading relationships with the EU. It is critically important that the highway network has the capacity and resilience to manage future disruption and ensure trade can flow as seamlessly as possible.

The current orientation of the highways network reflects a strong relationship between the south east's major economic hubs and London but does not leverage opportunities for better linkages and agglomeration between these hubs.

Without continued multi modal interventions by 2040 as outlined in the SIP, many additional large stretches of the transport network of the south east will be severely congested, eroding the potential for economic growth resulting in:

- Housing development slow down, increasing unaffordability.
- Undermining trade between the UK and EU.
- Continued over reliance on London.
- Increased community severance.
- Lower carbon alternatives to diesel vehicles will be less attractive making zero carbon goals unattainable for the region.
- Congestion will continue to choke towns, blight the natural environment, and undermine opportunities for growth, regeneration.
- Congestion risks undermining public transport and active travel modes.
- Deprived areas struggle to compete with better connected “competitors.”

The packages outlined in TfSE’s SIP are a step-change from “predict and provide” capacity enhancements of the past. Aligned with our vision and supporting not only strategic movement of vehicles but our places and communities. They have been refined to minimise increases in carbon emissions and impact on the wider environment but there is a need for further mitigation as these packages and interventions develop. Road packages must be complemented by other interventions.

- To promote demand management and digital technology.
- To reduce the number of trips.
- To accelerate the decarbonisation of road vehicles.
- To promote sustainable travel.

Working with key stakeholders and technical advisors, TfSE developed six coherent packages of interventions to deliver our vision and objectives. Included within these are the following which are relevant to the SRN:

- The need to introduce a progressive, national demand management tool, (such as those highlighted in the TfSE SIP) making it less attractive for journeys of all length.
- Investment in highway schemes on key freight corridors to unlock greater road capacity for HGVs, reducing congestion.
- Strong initiatives fostering the rollout and adoption of low emissions HGVs.

Whilst there is evidence at some locations to suggest that providing additional road capacity and addressing bottlenecks in the highway network has the effect of generating additional demand for the road network, thus eroding or even eliminating any expected reductions in traffic congestion. We also recognise that the SRN has to be fit for purpose and in a number of areas in our geography it falls short. This impacts not only on car and freight journey reliability but also public transport. This also highlights the importance of land use planning having regard to transport plans otherwise new road infrastructure risks promoting urban sprawl, high dependency on car use, and significant degradation of the natural environment.

The TfSE transport strategy utilised future demand modelling to understand how and where the transport network will see significant future strain. Congestion could be alleviated through investing in public transport alternatives, developing



**0300 3309474**



**tfse@eastsussex.gov.uk**



**transportforthesoutheast.org.uk**

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

integrated land use planning policies, adopting emerging transport technologies, and adopting demand management policies. The latter would involve users paying for more of their mobility they consume on a 'pay as you go' basis with the potential to better manage demand across the network – using pricing mechanisms across all vehicular modes, including by car, van and heavy goods vehicles to incentivise travel at less busy times or by more sustainable modes.

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

## Appendix 1

**What level of importance, if any, do you assign to the RIS3 strategic objective of:**

- **growing the economy?**
- **improving safety for all?**
- **network performance to meet customer needs?**
- **a technology-enabled network?**
- **managing and planning the strategic road network for the future?**
- **improved environmental outcomes?**

1. **Very important**
2. **Important**
3. **Neither important or unimportant**
4. **Unimportant**
5. **Very unimportant**
6. **Don't know**

### **TfSE Response**

Very important for all the above

### **Why?**

The strategic priorities align with Transport for the South East'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.

Transport for the South East's mission is to grow the south east's economy by delivering a safe, sustainable and integrated transport system that makes the south east more productive and competitive, improves the quality of life for all residents, and protects and enhances its natural and built environment. Its ambition is to transform the quality of transport and door-to-door journeys for the south east's residents, businesses and visitors.

Our strategic goals, set out below are aligned with those set out by National Highways in the Initial Report:

- **Economy:** improve productivity and attract investment to grow our economy and better compete in the global marketplace.
  - Better connectivity between our major economic hubs, international gateways (ports, airports and rail terminals) and their markets.
  - More reliable journeys for people and goods travelling between the south east's major economic hubs and to and from international gateways.
  - A transport network that is more resilient to incidents, extreme weather and the impacts of a changing climate.



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

- A more integrated approach to land use and transport planning that helps our partners across the south east meet future housing, employment and regeneration needs sustainably.
- A 'smart' transport network that uses digital technology to manage transport demand, encourage shared transport and make more efficient use of our roads and railways.
- **Society:** improve health, safety, wellbeing, quality of life, and access to opportunities for everyone.
  - A network that promotes active travel and active lifestyles to improve our health and wellbeing.
  - Improved air quality supported by initiatives to reduce congestion and encourage further shifts to public transport.
  - An affordable, accessible transport network for all that promotes social inclusion and reduces barriers to employment, learning, social, leisure, physical and cultural activity.
  - A seamless, integrated transport network with passengers at its heart, making it simpler and easier to plan and pay for journeys and to use and interchange between different forms of transport.
  - A safely planned, delivered and operated transport network with no fatalities or serious injuries among transport users, workforce or the wider public.
- **Environment:** protect and enhance the south east's unique natural and historic environment
  - A reduction in carbon emissions to net zero by 2050 at the latest, to minimise the contribution of transport and travel to climate change.
  - A reduction in the need to travel, increasing public transport use, to reduce the impact of transport on people and the environment.
  - A transport network that protects and enhances our natural, built and historic environments.
  - Use of the principle of 'biodiversity net gain' (i.e., development that leaves biodiversity in a better state than before) in all transport initiatives.
  - Minimisation of transport's consumption of resources and energy.

**What, if any, other specific roads do you think we should consider as trunking candidates? Detrunking Candidates?**

We support the trunking of the Kent routes:

1. south-east A229, M2 junction 3 (Chatham) to M20 junction 6 (Maidstone)
2. south-east A249, M2 junction 5 (Sittingbourne) to M20 junction 7 (Maidstone)
3. south-east A299, M2 junction 7 to Port of Ramsgate

*Of these we understand 2 are proceeding,*

We support the Surrey/Berkshire routes remaining Local Road network:

1. south-east A329(M), A322, A329(M), A329 and A322, Reading to Guildford
2. south-east A33 and A339, Reading (M4 junction 11) to Basingstoke

*These we understand are no longer proceeding.*

**Do you think National Highways has identified the right focus areas?**

- **How much its customers will travel**
- **How its customers will experience travel**
- **How it will manage its network**

1. **Yes**
2. **No**
3. **Don't Know**

Yes to all

**If no why not?**

TfSE agree with the focus areas identified. We are satisfied that the focus areas and their various elements as listed below map across to cover all of our own strategic goals which are aligned to the pillars of sustainability and are listed in the answer to question 5.

**How much its customers will travel:**

- growth and levelling up
- Car travel
- freight and logistics

**How its customers will experience travel:**

- safety
- digital
- decarbonisation

**How it will manage its network towards:**

- customer experience
- sustainable network development
- asset resilience

**To what extent do you agree or disagree with National Highways' approach to improving safety on its network?**

1. **Strongly agree (Go to 'Approach to making the most of the existing network')**
2. **Agree (Go to 'Approach to making the most of the existing network')**
3. **Neither agree nor**
4. **Agree disagree (Go to 'Approach to making the most of the existing network')**
5. **Disagree**
6. **Strongly disagree**
7. **Don't know (Go to 'Approach to making the most of the existing network')**

Agree

**Why do you disagree with the approach?**

Highways interventions are necessary to deliver a multi modal strategy, as it unlocks mass transit, active travel routes and improves safety.

It is very clear that safety is a major element of National Highways objectives and the report sets out what appears to be a thorough well researched industry

leading plan for improving safety in all areas for highway construction and operation.

One of TfSE's strategic goals is for the south east to have a safely planned, delivered and operated transport network with no fatalities or serious injuries among transport users, workforce or the wider public.

The approach set out by National Highways is supported by key stakeholders including the Road Safety Foundation which adds to the confidence we have in their plan which is aligned with the best practice Safe Systems approach. National Highways have an ambitious safety KPI that drives improvements across all their activities, network, company and supply chain and is stated to be maintained into RIS3 in the Initial Report. This is aligned with the strategic priority set out in our strategy for a safely planned, delivered and operated transport network with no fatalities or serious injuries among transport users, workforce or the wider public.

We also welcome the use of iRAP to assess and identify areas for safety improvement across the region and the country. We understand this is a leading data led methodology of assessing safety issues proactively and can identify hazards proactively from the road layout in addition to considering historic data and we support its use for prioritising improvements.

**To what extent do you agree or disagree with National Highways' approach for making the best use of the existing Strategic Road Network?**

1. **Strongly agree (Go to 'Evolving National Highways' customer and community services')**
2. **Agree (Go to 'Evolving National Highways' customer and community services')**
3. **Neither agree nor disagree (Go to 'Evolving National Highways' customer and community services')**
4. **Disagree**
5. **Strongly disagree**
6. **Don't know (Go to 'Evolving National Highways' customer and community services')**

Agree

**Why do you disagree?**

The comments below relate to the section in the Initial Report which relates to operation and maintenance of existing assets. It would be good to have further detail linked to the later section "Taking a targeted approach to enhancing our network" setting out how we can make the most of the existing network with enhancements too. There are several enhancements identified in the TfSE SIP identifying improvements to an existing road which could negate the need for a new road.

TfSE agree with the Data led asset management approach to maintenance employed by National Highways. Following international best practice and prioritising proactive maintenance will keep the best of the network in excellent condition for longer at a fraction of the cost of more expensive reactive repairs.



As improvements in the accuracy and timeliness of data are achieved as set out in the report, we agree that National Highways will be able to better understand their assets and manage them in the most cost-effective way. We are happy to share any data TfSE have or collect that National Highways think will be useful and appreciate the openness they have shown in sharing their data sets.

We agree that to keep users and freight moving on an ageing asset will require an increasing funding envelope because the need will continue to grow as more assets age and near or reach end of life and the network grows (eight new stretches of road returning from DBFO management in next road period).

We support delivering increased targeted renewals in response to historically deferred works with a greater volume of renewals of:

- flexible asphalt surface
- concrete road replacement
- structures renewals
- end of life technology assets

We do have a concern however that these increases are potentially going to be funded by reducing investment in major projects such as those outlined in our SIP. Without delivery of these schemes, the south east and likely the rest of the country where similarly denied priority investment will be unable to meet government policy objectives of economic growth, safety, housing and carbon reduction.

### **To what extent do you agree or disagree that National Highways should evolve its:**

- **customer offer?**
- **community offer?**
- **proposals for designated funds?**

- 1. Strongly agree**
- 2. Agree**
- 3. Neither agree nor disagree**
- 4. Disagree**
- 5. Strongly disagree**
- 6. Don't know**

Agree

### **If you disagree, why?**

We welcome National Highways commitment to broadening activities around improving customer travel choice and supporting better end-to-end journeys. Including developing a third road period programme of improvement and enhancements schemes for active travel infrastructure. A proposed formal assessment of how re-timing and re-modelling journeys could play a role in tackling issues during individual scheme development, in line with PAS 2080 is also welcome and TfSE would be keen to be involved in this work.

We welcome the offer of providing more extensive support for local transport and the possibility of National Highways partnering local authorities to support local



**0300 3309474**



**tfse@eastsussex.gov.uk**



**transportforthesoutheast.org.uk**

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

transport plans. In order to work to deliver a programme tackling specific congestion on the SRN identified in the Route Strategies. The proposals in this section are all positive including:

- Park and ride facilities,
- Access to public transport
- Promoting journey choice,
- Wider actions to support modal shift in towns and cities.
- Exploration programmes to increase vehicle occupancy,
- Working with local authorities, industry and local businesses to encourage measures including lift sharing and bus and coach travel.

We are also glad to see a lot of focus on freight and new freight corridor studies for priority areas in joint strategic planning with Network Rail. The Strategic Road Network carries two-thirds of all road-based freight traffic. Increasingly, National Highways and central government are realising the importance of taking a multi-modal approach as well as considering the complementarity of principal local roads, or the “Major Road Network” with associated funding along with highway based “Large Local Major Schemes.”

Freight and logistics operations require a resilient and reliable road network to operate effectively. Additionally, operations must be cost and time efficient to minimise the external impact of the operation on the environment and economy in the form of pollution and congestion, respectively. As identified as an action in TfSE’s [freight logistics and gateways strategy](#) (FLaGs, May 2022). TfSE has established a sub-group under its Freight Forum to bring together key personnel from National Highways and other stakeholders to develop a work programme, to help input to and track future infrastructure provision and use. We are pleased to see our own objectives reflected in the Initial Report as a result of this collaboration.

We welcome the preparation for the next evolution of technological changes that will affect the SRN as National Highways consider evidencing the need for increased investment in electric vehicle charge points and make crucial changes to systems, data and technology to ensure early adopters of autonomous vehicles can take advantage of increasing connectivity.

We support National Highways’ proposals for designated funds because they are proposed to be used to invest across a specific set of priorities aligned to National Highways’ strategic objectives with which TfSE are also aligned.

Creating a Designated Funds programme pipeline to improve delivery is a positive step to ensure delivery of the schemes can progress smoothly and as quickly as funding allows. The recently opened A27 cycle path in East Sussex is an example of good use of designated funds in the TfSE area and the scheme has proved very popular since opening this year. The addition of active travel infrastructure like this to road scheme improvements has shown what can be achieved with the designated funds programme.

The identification and development of investment programmes using Route Strategies, and through increased collaborative working with stakeholders including STB’s is a welcome statement. We are aligned with the Route

Strategies as a result of the engagement we have had working collaboratively with National Highways through their development. We would like to know more about the criteria and funding available for designated funds as we have had feedback through our Transport Strategy working group that there isn't sufficient funding for some of the required improvements that are needed off SRN that in turn would support the SRN or resolve issues caused by proximity to the SRN.

**To what extent do you agree or disagree with National Highways' approach for driving decarbonisation and environmental sustainability on the SRN?**

1. **Strongly agree (Go to 'Taking a targeted approach to enhancing the network')**
2. **Agree (Go to 'Taking a targeted approach to enhancing the network')**
3. **Neither agree nor disagree (Go to 'Taking a targeted approach to enhancing the network')**
4. **Disagree**
5. **Strongly disagree**
6. **Don't know (Go to 'Taking a targeted approach to enhancing the network')**

Agree

**What proposals do you disagree with and why?**

As part of our transport strategy development, TfSE carried out a carbon assessment of our region. By calculating the most up to date 'at tailpipe' carbon emissions for road and rail, we now have a baseline from which to plan a better, more sustainable transport network.

We also looked at the scale of the challenge we face to decarbonise transport, particularly on our roads. Our study found that, even under the most optimistic scenario for the conversion of road vehicles to zero emission, there would still be considerable residual carbon emissions from road transport in our region, mainly from freight and heavy goods vehicles.

We need to find ways to go further, faster. To help us do this, our report developed data models which allow us to assess the impact of proposed transport investment schemes and projects on our region's carbon emissions. We were able to use these models as part of our area studies to prioritise where interventions to reduce carbon emissions are and the type of intervention which will help us get to net zero carbon by 2050 at the latest.

Emissions have not declined since the late 1990s. In 2019 over half (55.4%) were derived from cars and taxis, just under one third (31.6%) from light and heavy goods vehicles with the remainder (13%) from other forms of transport.

The need for decarbonisation is strongly reflected within the TfSE Transport Strategy Vision, which states: "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."

To support this vision, it is important to recognise that:

- Decarbonisation of the transport system is not happening fast enough.
- The South East's transport systems need to adapt to a new normal- i.e., post pandemic, post Brexit environment.
- There is a need to "level up" left behind communities.
- There is a need for sustainable regeneration and growth.

Without intervention, the South East will maintain a slow trajectory to net-zero, only seeing a minor reduction total carbon emissions by 2050.

Without significant intervention, the UK as a whole will fail to meet its obligations in regard to the Paris Agreement: Failure to meet this overall obligation has grave ramifications given the context of wider carbon emissions, which will also impact the UK's Nationally Determined Contribution towards these targets.

Policies and projects accelerating the shift from ICE to zero emission vehicles, alternative modes of transport, and negating the need for travel altogether should have decarbonisation at the heart of their business case, planning and implementation.

National Highways have set out proposals to:

- Drive decarbonisation and environment sustainability.
- Achieve net zero corporate emissions.
- Reduce maintenance and construction emissions between 40 and 50% over RIS3. Facilitate low carbon travel.
- Demonstrate wider environmental leadership, including around biodiversity and climate resilience.
- Invest in low carbon technology to drive a step change in manufacturing.

TfSE welcome these proposals and accept this as a positive step in the right direction. The biggest hurdles that we see are:

1. The development of technological solutions and the industry developing materials and cleaner construction methodologies at the pace that is needed to achieve the reduction in emissions that are being sought.
2. Sufficient funding being available from government to allow National Highways to achieve reductions in emissions at the scale and pace that are needed.

National Highways have already adopted PAS 2080 which will ensure they have an industry leading carbon management system in place. It is also positive that National Highways have set out how they will provide government with the evidence on how to meet network needs by assessing each scheme against the 4 statements listed below set out on page 124:

1. Building nothing
2. Building less
3. Building cleverly
4. Building efficiently

It is not clear if schemes will be subject to all four of these tests or if they will flow through in order from 1-4 until a solution that meets all of the scheme objectives is met with the lowest environmental impact. It is our understanding that these tests should be applied in sequence at the earliest planning stage to assess the possibility of achieving the scheme objectives without building anything as a primary consideration. If this cannot be achieved a solution following the guidance within the building less element will be considered and assessed and so on through the stages until a solution is identified that meets all of the original scheme objectives. This approach ensures that any lower carbon alternatives will only be ruled out if they cannot deliver the scheme objectives.

It may be beneficial to give more explanation of PAS2080 as a system for the management of Carbon within the Initial Report. The phrase “Assessing all options against the PAS 2080 global standard for managing infrastructure carbon” could be misinterpreted that PAS2080 is a panacea and National Highways simply have to follow a set of guidance to ensure minimum carbon emissions.

It would also be beneficial to demonstrate the link between PAS2080 and other management systems employed by National Highways e.g., Quality (ISO9001), Asset Management (ISO 55001).

The SRN in the south east is of mixed quality and we would broadly agree that improving the network does not necessarily mean building new roads. We support an approach which seeks to investigate all non-physical methods before committing to build new infrastructure. However, there are some corridors that do need bold interventions and new alignments.

Emissions from the provision of additional capacity on the SRN, from construction and increased traffic that additional capacity enables, are stated with an expectation these will be small and a recognition that these still need to be carefully managed. Expansion of this would be beneficial including evidence of:

- Reduced emissions on relieved sections
- Benefits of including active travel and encouraging mode shift
- Inclusion of mass transit and bus measures

This may help with the misconception that all road schemes create more carbon with no benefits outside of additional capacity.

We welcome the Lower Thames Crossing (LTC) being developed as a pathfinder scheme that will explore carbon neutral construction. As the largest scheme to be delivered in the forthcoming RIS period and with its multi-faceted design and construction, it will give the opportunity to explore many carbon saving techniques and materials.

We welcome NH's commitment to:

- Improving Biodiversity,
- Climate resilience,
- Flood protection
- Provision of safe crossing for pedestrians and wildlife,
- Apply the circular economy.
- Water quality by improving run off to protect declining species.



**0300 3309474**



**tfse@eastsussex.gov.uk**



**transportforthesoutheast.org.uk**

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

- Trialling technologies to improve air quality.

The use of nature-based solutions is also welcome to slow the flow of water increase bio diverse habitats and capture carbon.

### **To what extent, do you agree or disagree with National Highways' approach for its future enhancements programme?**

- 1. Strongly agree (Go to 'National Highways performance')**
- 2. Agree (Go to 'National Highways performance')**
- 3. Neither agree nor disagree (Go to 'National Highways performance')**
- 4. Disagree**
- 5. Strongly disagree**
- 6. Don't know (Go to 'National Highways performance')**

Neither agree nor disagree

### **Why do you disagree?**

We will need to continue to invest in highways as they will remain an essential component of the transport system. Some new highways will be needed to open up housing and employment developments. There will also be a need to improve and maintain existing roads as highways-based travel will remain the most convenient. However, whilst investing, we must also ensure that schemes are designed and delivered in ways that minimise their impact. There are a number of underlying principles that should guide future investment:

- Make more efficient use of existing assets.
- Investment should not focus on adding endless capacity but should be directed towards targeted interventions and a multi-modal approach, supporting mass-transit and active travel.
- Focus should be on schemes that provide resilience and safety benefits, support freight movements, and provide segregation between longer strategic and shorter more local trips.

TfSE support the priorities for the third road period outlined in the Initial Report which are:

- Increase safety,
- Improve journeys
- Enable national and local economic growth through the lens of PAS2080 to ensure negative environmental outcomes are minimised.

We welcome the pledge to develop and deliver committed schemes from RIS1 and RIS2. Regarding the schemes incomplete in RIS2 we strongly believe that the process needs to continue through to ensure these schemes are ready for delivery when funds become available rather than "parking" them. In the TfSE region we have concerns over delays to the Arundel scheme, and that a lot of work has already been completed therefore to stop work at this point would be wasteful. National Highways should continue through the statutory process to avoid restarting at additional cost in the future.

When making decisions on how to progress these schemes we feel it is very important not to stop or delay schemes any further than is necessary. To help

manage expectations of stakeholders and not discourage private investment due to a perceived lack of commitment to the region. In the TfSE area we have two major airports 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.

There is some ambiguity regarding the delivery of committed RIS2 schemes and whether these will fall under scrutiny due to the current fiscal position and updates to policy, TAG, NPS etc. There should be a firm commitment that these schemes will go ahead, continue to progress and be separated from the comments in the Route Strategies "For clarity, this document does not: identify committed schemes for delivery as part of future RIS periods. This will be part of the wider RIS setting process "

TfSE would like to ensure that engagement is maintained with STB's as National Highways continue to take forward all stocktake actions working with DfT to deliver the recommendations made in the Transport Select Committee's report to further improve the safety of smart motorways. The schemes which were previously identified for smart motorways which are now shown as cancelled in the Route Strategies still have a strategic need for intervention. Whether this is implemented through an updated form of smart motorway using technology or alternative means other than all lane running these locations must not slip out of consciousness as a result of the solution no longer being viable.

We would like to see the elements mentioned separately linked together in the case of the A27 as we will set out in our response to the Route Strategies this road requires a long-term end to end solution. It falls under all the priorities set out in the taking a targeted approach to enhancing our network section listed below:

- Continuing to develop and deliver committed schemes from RIS1 and RIS2, addressing bottlenecks and the varying standards of roads which are the legacy of inconsistent investment in our network.
- Increasing safety on single carriageways and other A-roads, through route treatments to deliver improvements along a whole route, rather than one specific part of the road.
- Improving our existing network, not adding new roads

TfSE appreciate the recognition and promise of collaboration when mentioned regarding advocacy for an increased priority on smaller, locally focused enhancement schemes in the third road period. However, we would like to reiterate that while we support this type of scheme there are several schemes identified in the SIP which can only be addressed with larger intervention.

We also note the text:

"Through our evidence gathering process, including from our Route Strategies and work with STBs, we have already identified a potential number of small schemes across the country."

Followed by:

"The next step would be to develop a programme of schemes for each of our geographic regions for consideration."



**0300 3309474**



**tfse@eastsussex.gov.uk**



**transportforthesoutheast.org.uk**

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

TfSE would like to be consulted on the schemes that will progress and welcome continued collaboration and insight into the schemes already identified to ensure they are aligned with our SIP priorities. We are not currently aware what these schemes are and look forward to their confirmation as they don't appear to be in the Route Strategies.

We agree that it is important to ensure the improvements programme as a whole delivers robust value for money, and that it is more flexible to uncertainties in demand and can continue to meet changing needs. TfSE would like to ensure that the definition of "Value" is aligned with our own and that National Highways will consider wider benefits than financial. Value must be defined in a framework aligned with the objectives set out by government with which STB's and National Highways are also aligned.

**To what extent do you agree or disagree with the assessment in the SRN Initial Report on the most important performance outcomes to measure?**

- 1. Strongly agree (Go to 'Cross cutting proposals')**
- 2. Agree (Go to 'Cross cutting proposals')**
- 3. Neither agree nor disagree (Go to 'Cross cutting proposals')**
- 4. Disagree**
- 5. Strongly disagree**
- 6. Don't know (Go to 'Cross cutting proposals')**

Neither agree nor disagree

**Why do you disagree?**

Considering the range of responsibilities that National Highways has we are not clear why there would be a limit of 10 KPI's. It is likely fair to assume there will be 10 headline KPI's made up of measures within them. KPI's should be developed in a way to avoid driving behaviours inconsistent with their rationale for adoption.

We agree that it is important the performance framework reflects the plans and proposed outcomes set out in the Initial Report.

We agree there is a need to develop a carbon metric to help monitor progress against the net zero plan.

We question if it is necessary to include a biodiversity KPI to reflect the latest legislation and achieve 10% biodiversity net gain. Staying within the law should not require a KPI unless there is a target to achieve greater than the legislation requires.

"Exploring how to effectively measure improvements in operational technology to increase the reliability and security of our roads." Bundling three elements into a single KPI seems vague and difficult to measure. This would appear to require several KPI's to measure.



“Reviewing how the renewals programme is monitored to reflect the greater focus on investment to provide a reliable, sustainable and safe road network.” This again appears to require multiple elements or KPI’s to measure.

“Reviewing the approach to monitoring designated funds, recognising its targeted approach to deliver social value and support Levelling Up.” This would be a KPI measuring the same elements as the approval process and therefore a “free hit.” Post scheme reviews should be completed as a matter of course with lessons learned feeding back into the approval process rather than a KPI.

It is not clear what “Exploring a performance indicator that supports active travel by understanding the views of our cyclists and walkers” means and how this would translate into a KPI but we welcome its inclusion and support the intent.

As long as the KPI’s are in alignment to the focus of the RIS3 period and support the objectives we have already stated our agreement with we support them.

### **What, in your view, could be done differently to meet the needs of people affected by the presence of the SRN?**

Several strategically significant (and busy) highways pass through or close to sensitive environments, such as National Parks, and/or through urban areas, which undermines the quality of life for residents. Where the SRN is underdeveloped there is evidence that shows users use less appropriate roads through protected landscapes. Any highway intervention proposed should be designed to de-conflict local and longer-distance traffic, and address safety and air quality issues. They should support (and be supported by) public transport and active travel improvements.

The SRN in Urban areas presents various opportunities and challenges. We support the work National Highways have done with their Urban SRN framework development, and the common issues identified below are in alignment with our Transport Strategy and SIP.

- Lack of sense of place.
- Decarbonisation.
- The need for improved integrated planning and collaboration.
- The need to balance performance of the transport networks and environmental and social issues.

We continue to support the framework approach proposed by National Highways. Having the SRN and MRN pass through so many of our urban areas, while providing high-capacity routes and good connectivity, creates issues of congestion, community severance, road safety, air quality, noise and carbon emissions. There are opportunities for many of these routes, to look again at the balance of road space provided to private cars, public transport, and active transport modes.

- We would urge more weight is given to the need to consider the SRN as a key part of the transport infrastructure in urban areas. Recognise the need to consider it holistically with other modes and transport networks.



0300 3309474



tfse@eastsussex.gov.uk



transportforthesoutheast.org.uk

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

- A holistic appraisal approach should focus around providing a strong strategic case for the need for intervention, and the combined benefits and aims of the schemes outside of the SRN.
- Any mitigation deemed necessary on the SRN is not at the detriment of a greater need for mitigation on other networks or for other modes, such as public transport and/or active travel.
- TfSE is undertaking a number of pieces of thematic work. Including around freight, decarbonisation and EV/alternative fuel charging. We would like to reiterate that we are happy to share the outcomes and have further discussions with National Highways/DfT.
- Through the development of our area studies and SIP, we have identified a number of locations across the south east where the SRN is causing issues within urban areas, along with a number of potential multi-modal interventions.

**Do you think the approach to digital technology set out in the SRN Initial Report puts National Highways on the right track for meeting its vision for 2050?**

1. **Yes (Go to 'Equality impact assessment')**
2. **No**
3. **Don't know (Go to 'Equality impact assessment')**

Yes

**Why not?**

TfSE agrees with the trends set out on the digitisation of the road network section, particularly regarding the improvement of the construction and resilience of the network, and its use to maximise network assets. We would like to see more evidence regarding some of the issues in your strategy relating to:

- The uptake of autonomous vehicles
- How provision of digital information affects driver-related behaviour change

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 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.

Issues surrounding smart motorways need to be resolved to prioritise safety, until it can be assured on this basis TfSE support the cancellation of new all lane running schemes in the programme. However, it is also important to keep looking to the future to ensure that the need for additional betterment schemes (on or off network) are identified through strategic studies, particularly where additional capacity is required. The M25 south west quadrant strategic study

provides an example of this. There are other emerging technologies such as CAV that could improve the capacity of the network. National Highway's smart motorway approach will need to develop to embrace these emerging technologies.

In planning future highways investment, there is a need to look wider. To consider highways as multi-modal movement corridors, providing for journeys by electric and hydrogen powered vehicles, bus, and all forms of active travel. We welcome that all of these elements have been identified within the Initial Report but would like more detail regarding how the SRN can support multi modal travel in a wider context than within improvement schemes at specific locations.

Innovative technologies present opportunities and challenges for transport. Enabling manufacturers to improve vehicle safety and environmental performance. Also enabling delivery of new more sustainable ways of transport (e.g., electric scooters) and business models that improve information, accessibility, and choice for travellers. A note of caution, however, is to avoid a situation where technology competes with sustainable travel by promoting ride sharing over traditional public transport (as has occurred in some North American cities).

### **What, if any, evidence and other insights can you supply towards the development of our RIS3 equality impact assessment?**

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.

### **What, if any, comments do you have on the analytical approach?**

The TfSE transport strategy set out our desire for a shift toward a 'decide and provide' approach to transport provision. This means actively choosing a preferred future, with preferred transport outcomes as opposed to responding to existing trends and forecasts. The transport strategy utilised future demand modelling to understand how and where the transport network will see significant future strain. However, instead of simply expanding the network where strain will be most acute, the transport strategy sets out how this congestion could be alleviated through investing in public transport alternatives, developing integrated land use planning policies, adopting emerging transport technologies, and adopting demand management policies.

The approach set out in the Initial Report appears to be aligned with TfSE's priorities but it isn't possible to comment to a greater detail as the metrics and data used are not given in detail. In general, the report sets out a logical approach for managing the strategic road network but falls short of demonstrating how the SRN is considered in the wider context of integrated travel. There isn't clear demonstration of using analysis to provide solutions to improve the SRN with off-site schemes. There are fundamental improvements to transport that could be made by considering transport systems together looking for solutions outside of the siloes of the current funding streams.

We welcome emphasis on the strategic case for RIS3 and RIS4 pipeline schemes and as mentioned the consideration of wider strategic benefits. TfSE are happy to continue collaborating with National Highways in this area.

It is not entirely clear why the six strategic objectives listed in the Analysis to inform RIS3 document are not the same as the five targeted proposals outlined in the Initial Report. This could be an indication of a lack of alignment despite there being a lot of crossover between the two lists.

Regarding the major projects section there is a potential concern regarding the review of committed schemes that require funding in RIS3. It is important that the strategic objectives reviewed against in the objective impact analysis tool are compatible with wider priorities than that of just the SRN and outlined in our response to the approach for the future enhancements programme question.

when considering value, until transport is considered holistically in a joined-up fashion the greatest benefits will never be achieved.

In the Analysis to inform RIS3 document there is a section regarding major projects and how both:

- Schemes committed in previous road investment strategies that will still require funding in road period 3
- New RIS3 enhancements

Will be appraised in line with TAG on a value for money basis.

This again raises our concern regarding the schemes in the TfSE area not commenced in RIS2 and whether they are or are not committed for delivery in RIS3. We would like to know what are the new RIS3 enhancements to be appraised? Are these potentially to be inserted at the risk of schemes committed in previous road investment periods that will still require funding in road period 3? There are no new RIS3 schemes listed in the Route Strategies or anywhere in the RIS3 documents.

We would reiterate here our concern about stopping development of these schemes and highlight the need to develop/understand strong strategic cases. These should not just be considered for their support of RIS objectives but other strategic objectives such as from STB strategies, LTP's, housing/employment growth etc.

In the developing our appraisal section of the Analysis to inform RIS3 document there is a bullet highlighting the desire to ensure better understanding of the interactions between potential RIS3 schemes. Again, we feel that the more pertinent consideration of interaction between RIS schemes is that of RIS schemes with the wider transport network. Particularly the MRN and local roads. Consideration should also be given to the use of NTEM data as it doesn't reflect local plans. A sensitivity test to check against actual housing and employment plans would be appropriate.

As an STB we are very keen to benefit from the world leading second generation RTMs and the National Highways economy model, in order to inform our work and improve our own modelling capability and understanding of the road network in our region.

The SINAT tool is welcomed in as far as it is looking beyond the boundaries of a single scheme but is it possible to widen its scope to look at the impacts and benefits on the wider SRN not just other SRN schemes, also the impact/effect on the MRN, local road network, rail, bus, mass transit, active travel? There is inherent risk of keeping the SRN in a silo only considering impacts to itself.

In the final paragraph of the environmental impacts section of the Analysis to inform RIS3 document it would be beneficial for the term “whole life carbon” to be added to the description as this is what is being described.

### **Are there any other issues you think the government should consider as part of this consultation?**

The TfSE Strategy highlights the key features of the sustainable route to growth scenario which includes concern for the environment leading to the widespread adoption of sustainable policies and practices, including integrated land-use and transport planning, as well as targeted demand management measures. These include users paying for more of their mobility on a ‘pay as you go’ basis, with bus and rail fares having been reduced in real terms in the longer period. This will result in greater sustainable travel modes, providing alternatives to the private car.

It is acknowledged that the current pipeline of highway schemes being delivered through the RIS will address short term capacity and connectivity challenges. However, in the longer term, when the SRN in the region is fit for purpose, the focus should shift away from road building (‘planning for vehicles’) towards investing in public transport services (‘planning for people’) and, supporting policies such as integrated lands use and transport planning and demand management policies (‘planning for places’).

In our SIP we have identified five global policy interventions which are 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. The key global policy interventions that would help deliver the investment priorities of the south east are:

### **Decarbonisation**

We need to deliver a faster trajectory towards net zero than current trends, including rapid adoption of zero emission technologies, to avoid the worst effects of human-induced climate change. This includes working with partners at all scales of government and the private sector, including through the regional transport decarbonisation forum, to decarbonise energy production and provide infrastructure for electric vehicles and green hydrogen refuelling.



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

### **Public Transport Fares**

The government should consider ways to reverse the increase in real terms of the cost of public transport compared to motoring and increase ticket integration to reduce barriers.

### **New Mobility**

We see great potential for new mobility technologies (e.g., electric bikes and scooters) and access opportunities (e.g., subscription models, car clubs and Mobility as a Service (MaaS)) to support decarbonisation of travel in the south east.

### **Road User Charging**

We encourage the UK government to develop a national road user charging system to provide an alternative source of funding to fuel duty and to help manage demand in parallel to integrated local measures. Local authorities also have the opportunity to investigate workplace parking levies and Low Emission Zones in their areas where appropriate.

### **Virtual Access**

The past two decades, amplified by the global Covid pandemic have shown how virtual working can help reduce demand for transport services.

### **Integration**

We wish to see improvements in integration across and between all modes of transport in terms of infrastructure, services, ticketing and accessibility supporting seamless journeys and improved first and last mile connectivity. In addition, we support further integration between transport and land use planning and delivery of services, infrastructure and development.

There is no mention of demand management other than in reference to the desire for it from environmental stakeholders and in the glossary of terms. We feel demand management policies should be implemented to improve the efficiency of the transport network for road freight and to invest in sustainable alternatives to resolve issues of freight disrupted by congestion on many strategic road corridors. We are keen for demand management to be explored on a national scale and would welcome inclusion in any discussions that take place.

We believe that holistic demand management initiatives that address road congestion while avoiding displacement effects from one part of the network to another will be key to delivering on our objectives. How highways will be paid for in future also needs urgent debate. The revenue lost from Vehicle Excise Duty and Fuel Duty as we move to electric vehicles will need to be replaced, but in doing so, we will need to carefully consider the relative costs of the car versus public transport.

We are concerned that the documents are intoning an increase required in maintenance budgets and that these costs may be funded from the major projects budget leaving less funds for investment in improving the ability of the SRN to fulfil its strategic role. As evidenced in the TfSE 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 discussion 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

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 facilitate change there is a need to grasp the problem and look at solutions as investments without which there will be an inability to meet the targets set by government.

How can we turn the ambitious plans laid out in the SIP into reality if we are restricted by funding allocated in silos on a what is affordable basis rather than considering what we need to do to achieve policy goals.

A direct example of this is the direct conflict between housing targets and the ability for local authorities to deliver them without improved infrastructure. We accept that private finance has a part to play but many areas of the SRN are at capacity which forces NH to object to planning applications on the basis the network cannot cope with the additional traffic.

**Any other comments?**

No