

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

**Date of meeting:** 27 January 2025

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

**Title of report:** Responses to Consultations

**Purpose of report:** To agree the draft responses submitted in response to a consultation.

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***RECOMMENDATIONS:***

The members of the Partnership Board are recommended to:

- 1) Agree the draft response to Invest 2035: The UK's modern industrial strategy; and
  - 2) Agree the draft response to Bracknell Forest: Local Plan Transport Consultation.
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**1. Introduction**

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

- Invest 2035: The UK's modern industrial strategy
- Bracknell Forest: Local Plan Transport Consultation

**2. Invest 2035 – The UK's modern industrial strategy**

2.1 The Department for Business and Trade published the Invest 2035: the UK's modern industrial strategy consultation on 14 October 2024.

2.2 This consultation closed on 25 November 2024, and the officer level response that was submitted is contained in **Appendix 1**.

2.3 TfSE responded online via the consultation questionnaire. There were three relevant questions which TfSE responded too in the consultation questionnaire. The questionnaire also provided an opportunity to provide any additional information:

- What are the most significant barriers to investment? Do they vary across the growth-driving sectors? What evidence can you share to illustrate this?
- Where you identified barriers in response to question 7 which relate to planning, infrastructure, and transport, what UK government policy solutions

could best address these in addition to existing reforms? How can this best support regional growth?

- How can investment into infrastructure support the industrial strategy? What can the UK government do to better support this and facilitate co-investment? How does this differ across infrastructure classes?

2.4 Within the “significant barriers to investment” question, TfSE identified the specific transport-infrastructure barriers to business investment which the Transport Strategy is seeking to address:

- Poor transport connectivity
- Poor network performance
- Investment uncertainty
- Lack of integration
- Affordability and accessibility

TfSE also highlighted the recent work to refreshing our Transport Strategy which includes a ‘Need for Intervention Report’. This report contains the evidence base underpinning the strategy, setting out the challenges that the South East currently faces.

2.5 The Green Paper only contains brief outlines of policy announcements to address barriers to investment and TfSE have outlined the aspects of Government policy that will need to be developed further if the challenges to transport infrastructure barriers are to be addressed.

2.6 In answering how investment into infrastructure can support the industrial strategy question TfSE identified various ways including:

- Enhancing connectivity and accessibility to enable improved access to supply chains and labour markets and facilitate increased trade;
- Enhancing workforce mobility and productivity through reduced travel times;
- Improving the resilience of transport networks and the supply chains that rely on them;
- Reducing distribution costs for businesses.

2.7 Finally, TfSE welcomed the opportunity to respond to the consultation. TfSE took the opportunity within the additional information question to highlight that the South East is the UK's second largest economic contributor with £230bn GVA, this being second only to London. While the region benefits from strategic infrastructure including international ports and airports, it faces two key challenges:

- Economic disparity: A number of our coastal areas have GVA per capita at less than half of Thames Valley and Surrey levels.

- Investment risk: Despite its role in generating national tax receipts, the region risks underperforming without continued investment support.

### **3. Bracknell Forest: Local Plan Transport Consultation**

3.1 Bracknell Forest Council (BFC) held a period of engagement for their Local Transport Plan (LTP).

3.2 This consultation closed on 30 December 2024 however, TfSE have been provided an extension to 6 January 2025 and the officer level response that was submitted is contained in **Appendix 2**.

3.3 Overall, TfSE welcomed the opportunity to respond to the consultation. TfSE trust that our response will provide value to the work of BFC and form the basis for further engagement, especially on the refresh of our Transport Strategy.

3.4 TfSE have highlighted that the BFC vision in their LTP does not make reference to 'integration' or 'improved connectivity'. TfSE have offered a recommendation of adding the word 'integrated' in the first sentence of the LTP vision. TfSE have also added a further recommendation to include 'improved connectivity' in the vision. This is due to the strong strategic road and rail connectivity that BCF enjoys to external destinations anchoring it as a vital economic hub as set out in the 'scene setting' section.

3.5 TfSE were pleased to carry out a comparison of the objectives of the LTP and the fifteen strategic objectives of TfSE's Transport Strategy. TfSE applauded the good alignment with 12 of the 15 strategic priorities aligning with 8 of the 12 BCF objectives.

3.6 Finally, TfSE have highlighted that there is no reference to the role of any strategic transport improvements outside Bracknell Forest. In addition, there is no reference to any joint working with the other Berkshire authorities. TfSE have also expressed the disappointment to not see a reference to the role of TfSE in identifying the strategic infrastructure proposals that will benefit Bracknell Forest, its neighbouring Berkshire authorities as set out in our Strategic Investment Plan (SIP).

### **4. Conclusions and recommendations**

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

**RUPERT CLUBB**  
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## TfSE draft response to the consultation on Invest 2035: The UK's modern industrial strategy

*The only mechanism for responding to the consultation was through an online consultation questionnaire. The responses to the three questions relevant to TfSE's mission are set out below with background information about TfSE and general comments on the consultation included in a 'is there any other information you would like to provide' question at the end of the questionnaire.*

### TfSE's draft responses to the consultation questions

#### Question 7

**What are the most significant barriers to investment? Do they vary across the growth-driving sectors? What evidence can you share to illustrate this?**

An efficient and reliable transport system is critical for supply chains, workforce mobility, and market access. The specific transport infrastructure barriers to business investment which Transport for the South East (TfSE) as a Sub-national Transport Body is seeking to address through its regional Transport Strategy are as follows:

1. **Poor transport connectivity** – poor transport connectivity between towns, cities and their rural hinterlands inhibits access to supply chains, the workforce and markets and thereby discourages business investment. The South East regional has good radial road and rail connectivity to London however, most orbital and east-west corridors are poorly served
2. **Poor network performance** – congestion on the network and a lack of maintenance leads to poor reliability and efficiency resulting in increased costs to business. The South East's transport infrastructure faces multiple risks and vulnerabilities that threaten its resilience
3. **Investment uncertainty** - lengthy lead-in times for transport infrastructure and a 'stop-start' approach to transport and infrastructure investment, create uncertainty for businesses
4. **Lack of integration** between:
  - a) different transport modes - creates inefficiencies for freight transport and inhibits access to labour markets;
  - b) the various national, regional and local bodies responsible for developing and managing the transport system - results in a siloed approach to transport planning and investment and creates uncertainty for businesses about long term investment proposals
  - c) transport and land use planning - results in insufficient provision of new and upgraded transport infrastructure to support new business and housing growth

5. **Affordability and accessibility** – lack of affordable and public transport provision inhibits access to labour markets. Many of the coastal areas in the South East are at risk of transport related social exclusion.

As part of the work we have undertaken to refresh our Transport Strategy, we have produced a 'Need for Intervention Report'. This contains the evidence base underpinning the strategy and sets out the challenges that the South East currently faces that our Transport Strategy must seek to address. This report sets out more detail on a number of the barriers to business investment highlighted above in the South East context including:

- Road and rail connectivity challenges
- The impact of congestion on the performance of the road network
- The resilience challenge
- The housing affordability and delivery challenge
- The public transport affordability challenge

A copy of this report can be made available on request, as it will not be made public until the consultation on the Transport Strategy commences on 10 December 2024.

The potential Government policy solutions to these barriers are set out in the response to Question 14.

**Question 14**

**Where you identified barriers in response to question 7 which relate to planning, infrastructure, and transport, what UK government policy solutions could best address these in addition to existing reforms? How can this best support regional growth?**

The Green Paper only contains the briefest of outlines of the policy announcements that the Government has made relating to planning, transport, and infrastructure. The specific reforms mentioned are the forthcoming update to the **National Policy Statements**, the announcement in the King's Speech about the forthcoming **Planning and Infrastructure Bill**, the development of a **10 year infrastructure strategy** and a rolling stock strategy for the rail industry.

There are a number of aspects of Government policy that will need to be developed further if the transport infrastructure challenges identified in the response to Q7 are to be addressed.

**Infrastructure Planning** - There are a number of emerging policy developments that should improve the accelerate the planning and delivery of infrastructure:

- the proposed **Planning and Infrastructure Bill** that will seek to streamline and simplify the consenting process for major infrastructure projects;

- the proposed amendments to the **National Policy Statements** that will need to set clear criteria for project approvals to speed up infrastructure delivery
- the proposed merger of the National Infrastructure Commission and the Infrastructure and Projects Authority to create the **National Infrastructure and Service Transformation Authority** that will have oversight of strategy and delivery into one organisation and develop and implement the Government's forthcoming **10 year infrastructure strategy**.

**Funding** - There are a number of aspects of the Government's approach to funding that need to be addressed:

- **Ensuring adequate levels of funding for transport infrastructure and longer term funding certainty** to:
  - address the 'stop-start' approach to infrastructure funding planning enabling creation of infrastructure pipelines that will be more attractive to private sector financing and give businesses greater confidence to invest.
  - to improve network resilience by enabling a shift from reactive to preventive maintenance to address wear and tear before major failures occur.
- **Securing greater private sector funding and financing** through:
  - **moving to a beneficiary pays approach** through the use of tolls and charges that provide a revenue stream that can be used to finance private sector investment in infrastructure projects;
  - **introducing Improvements to the existing system of developer contributions** to ensure more public value is extracted from development to deliver the necessary transport and social infrastructure required.
  - **promoting the use of more innovative funding mechanisms** to address infrastructure funding gaps including land value uplift and tax increment financing and greater use dedicated investment funds.
- **Local authority funding** – ensure local authorities have both the capital and revenue funding needed to undertake their land use planning and infrastructure planning responsibilities and speed up the planning and delivery of development proposals and their associated infrastructure.

### **Integrated Transport and Land Use Planning**

There are a number of aspects of the way in which both land use and transport planning are undertaken that the Government needs to tackle if the barriers to business investment identified in the response to Question 7 are to be addressed.

- **The need for strategic planning at scale** – currently land use planning through the Local Plan process takes place at too small a scale to enable the

infrastructure needed to support development to be properly planned and provided. Strategic land use planning at scale would provide the opportunity to ensure better alignment between infrastructure investment with land use strategies. This would enable sustainable, efficient, and well-connected communities to be created where homes, workplaces, and amenities are located close to transport links, minimising travel times. These places will be more successful at attracting business investment.

- The **Spatial Development Strategies** (SDS) that have been developed in the mayoral city regions including London, Manchester and Liverpool provide evidence of the merits of land use planning at scale. They assist in identifying constraints, setting housing requirements, identifying strategic employment sites and identifying corresponding infrastructure needs to ensure the Local Plans introduced in an area where an SDS is in place are effective, deliverable and sustainable.
- The Government made a commitment in the recent consultation on proposed revisions to the **National Policy Planning Framework** to provide universal coverage of strategic land use planning across England. The introduction of this approach is welcomed but the Government is yet explore the most effective arrangements for developing SDSs outside of mayoral combined authority areas. This includes the identification of the most appropriate geographies over which they should apply covering 'functional economic areas', as well as the right democratic mechanisms for securing agreement for SDSs.
- The Government has now commenced work development of a **National Integrated National Transport Strategy** (INTS). This will provide the opportunity to achieve better outcomes for business and the travelling public through better alignment between national transport policy, STBs regional transport strategies and the local transport plans produced by local transport authorities. The INTS must address the shortcomings of existing siloed approach to transport infrastructure planning where strategic road, rail and local transport improvements are all planned and delivered separately. This inhibits the ability to deliver a cohesive and efficient transport network enabling seamless interchange between different transport modes and the creation of sustainable, efficient, and well-connected communities that will attract business investment.

The development of the INTS, supported by STBs transport regional strategies, alongside the roll out of SDSs will create the opportunity for integrated transport and land use planning at a regional level. This will enable land use decisions take account of transport system considerations to deliver reductions in the distances

travelled, a shift to more sustainable modes and communities that are more attractive to people and businesses.

**Question 15**

**How can investment into infrastructure support the industrial strategy? What can the UK government do to better support this and facilitate co-investment? How does this differ across infrastructure classes?**

There are various ways in which investment into infrastructure support the industrial strategy including the following:

- Enhancing connectivity and accessibility to enable improved access to supply chains and labour markets and facilitate increased trade;
- Enhancing workforce mobility and productivity through reduced travel times;
- Improving the resilience of transport networks and the supply chains that rely on them;
- Reducing distribution costs for businesses.

The Government announced the Planning and Infrastructure Bill in the King's Speech and the creation of a 10 year Infrastructure Plan. The creation of this long term plan should help encourage greater levels of private sector investment by providing greater certainty about the Government's ongoing commitment to infrastructure provision.

Not all segments of the transport system generate fare box revenue that can potentially be used to finance private sector funding and facilitate co-investment. This is particularly the case for road infrastructure where the charge for using the network is collected indirectly through vehicle taxes and fuel duty rather than at the time of use. The Government needs to consider more widespread introduction of the 'beneficiary pays' approach through the use of tolls and charges that provide a revenue stream that can then be used to finance private sector investment in the infrastructure.

**Question 36.**

**Is there any additional information you would like to provide?**

Transport for the South East (TfSE) welcomes the opportunity to respond to the consultation on the Government's green paper on its new industrial strategy. **This draft officer response will be presented to our Partnership Board on 9 December 2024 for their approval. A further iteration may therefore follow.**

TfSE is a sub-national transport body (STB) for the South East of England, Our principal decision-making body, the Partnership Board, brings together representatives from our 16 constituent local transport authorities, district and



borough authorities, protected landscapes, business representatives, Highways England, Network Rail and Transport for London.

The South East contributes £230bn of GVA to the UK economy, this being second only to London. It is a gateway to the UK economy home hosting a number of international ports and airports. However, the region often suffers from being grouped with London in discussions about the economic performance of England's regions. The Green Paper is no exception, with reference to the UK's economic performance being "skewed towards London and the South East". Although the green paper does recognise that "The world-leading industries in London and the South East have a critical role in driving national prosperity", it is vital that investment in the South East continues to ensure it continues to generate the tax receipts needed to unlock the "untapped potential outside the capital and its surrounding areas". Without this continued investment the risk is that the South East's potential will not be realised.

There are significant parts of the South East that are underperforming. A number of our coastal communities have a GVA per capita of less than half those in the Thames Valley and Surrey. The whole county stands to benefit from efforts to address this as they will ensure that the South East realises its full economic potential.

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## **Bracknell Forest Local Transport Plan Consultation Response from Transport for the South East**

### **1. Introduction**

1.1 This document is the draft Transport for the South East (TfSE) response to the consultation on Bracknell Forest Council's Local Transport Plan. This is a draft officer response that will be presented to our Partnership Board on 27 January 2025 for their approval. A further iteration may therefore follow.

1.2 TfSE is a sub-national transport body (STB) for the South East of England. Our principal decision-making body, the [Partnership Board](#), brings together representatives from our 16 constituent local transport authorities, district and borough authorities, protected landscapes, business representatives, Highways England, Network Rail and Transport for London.

1.3 We have a vision led [Transport Strategy](#) in place to influence government decisions about where, when and how to invest in our region to 2050. This strategy is currently in the process of being refreshed with a draft copy of the revised strategy out for consultation until 7 March 2025.

1.4 Our [Strategic Investment Plan](#) provides a framework for delivering our Transport Strategy setting out transport infrastructure and policy interventions needed in our region over the next three decades.

1.5 TfSE welcomes the opportunity to respond to the consultation. We trust that our response will provide value to the work of Bracknell Forest Council Council but also form the basis for further engagement, especially on the refresh of our transport strategy throughout 2025. Specifically, we are keen to establish a 'golden thread' in policy terms so that Bracknell Forest – as well as other Local Transport Authorities (LTAs) – are able to achieve their own goals whilst playing a significant role in achieving our wider vision for the South East.

### **2. Vision and Objectives**

2.1 The Bracknell Forest LTP Vision shows a fair degree of alignment with the 2050 Vision set out in TfSE's existing Transport Strategy. The degree of alignment between the economic social and environment dimensions of the two Visions is set out in Table 1 below.

**Table 1: Alignment between the Bracknell Forest LTP Vision and the 2050 vision in TfSE’s adopted Transport Strategy.**

Bracknell Forest LTP Vision	TfSE Transport Strategy Vision
<p>“To develop a sustainable and <b>resilient</b> transport network that <b>reduces carbon</b>, provides choice and <b>access for all</b> in a <b>safe</b> and <b>healthy environment</b>, making Bracknell Forest a <b>desirable place</b> to live, work and <b>grow</b>.”</p>	<p>By 2050, the South East of England will be a leading global region for <b>net-zero carbon</b>, sustainable <b>economic growth</b> where integrated transport, digital and energy networks have delivered a step-change in connectivity and <b>environmental quality</b>. A high-quality, <b>reliable, safe</b> and <b>accessible transport network</b> will offer seamless door-to-door journeys enabling our businesses to <b>compete and trade more effectively</b> in the global marketplace and giving our residents and visitors the <b>highest quality of life</b>.</p>

2.2 The Bracknell Forest LTP Vision does not make reference to ‘integration’ or ‘improved connectivity’. However, the different transport modes will need to be better integrated if Bracknell Forest LTP Vision is to be achieved. For that reason, we would recommend inclusion of the word ‘integrated’ in the first sentence of the LTP Vision. In the ‘Scene Setting’ section of the LTP reference is made to the strong strategic road and rail connectivity that Bracknell Forest enjoys to external destinations that anchors it as a ‘vital economic hub’. In view of this we would recommend that reference be made to ‘improved connectivity’ in the Vision.

2.3 A comparison of the objectives of the Bracknell Forest LTP with the fifteen Strategic Priorities of TfSE’s Transport Strategy is set out in Table 2. This demonstrates good alignment with 12 of TfSE’s 15 strategic priorities aligning with 8 of the 12 Bracknell Forest LTP objectives.

Bracknell Forest LTP Objectives	TfSE Transport Strategy Strategic priorities
<p><b>Sustainable Travel, enhancing safety and creating inclusive places</b></p>	
<p>Objective 1.1: Establish inclusive access for all across our transport network</p>	<p>An affordable, accessible transport network for all that promotes social inclusion and reduces barriers to employment, learning, social, leisure, physical and cultural activity.</p>
<p>Objective 1.2: Improve usage of active travel networks</p>	<p>A network that promotes active travel and active lifestyles to improve our health and wellbeing.</p>
<p>Objective 1.3: Create safer roads and lower instances of road traffic accidents</p>	<p>A safely planned, delivered and operated transport network with no fatalities or serious injuries among transport users, workforce or the wider public.</p>
<p>Objective 1.4: Deliver high-quality public realm, supporting safe and connected communities</p>	

<b>Support a thriving and connected economy</b>	
Objective 2.1: Create a transport network to support economic growth, and sustainable access to employment, education and skills training	<p>Better connectivity between our major economic hubs, international gateways (ports, airports and rail terminals) and their markets.</p> <p>More reliable journeys for people and goods travelling between the South East's major economic hubs and to and from international gateways .</p>
Objective 2.2: Embrace new technologies that enhance the quality and efficiency of transport networks and deliver a positive user experience	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
Objective 2.3: Support the effective movement of freight across a variety of transport modes	
Objective 2.4: Effectively manage our highway assets in a sustainable way	
<b>Provide a green and sustainable environment</b>	
Objective 3.1: Support decarbonisation of our transport network	A reduction in carbon emissions to net zero by 2050, at the latest, and minimise the contribution of transport and travel to climate change.
Objective 3.2: Reduce dependence on private car travel and enhance modal choice for all	<p>A seamless, integrated transport network with passengers at its heart, making it simpler and easier to plan and pay for journeys and to interchange between different forms of transport.</p> <p>A reduction in the need to travel, particularly by private car, to reduce the impact of transport on people and the environment.</p>
Objective 3.3: Ensure our local transport network protects and enhances the local environment, biodiversity, and air quality	<p>A transport network that protects and enhances our natural, built and historic environments</p> <p>Use of the principle of 'biodiversity net gain' (i.e. development that leaves biodiversity in a better state than before) in all transport initiatives.</p> <p>Improved air quality supported by initiatives to reduce congestion and encourage further shifts to public transport.</p>

Objective 3.4: Encourage the uptake of zero and low emission vehicles	
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2.4 The three TfSE strategic priorities that are not encompassed within any of the Bracknell Forest LTP objectives are as follows:

- A transport network that is more resilient to incidents, extreme weather and the impacts of a changing climate.
- 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.
- Minimisation of transport’s consumption of resources and energy.

2.5 Network resilience is becoming an increasingly important issue given the impacts of climate change and we would recommend that objective 2.4 be amended to include the phrase ‘to improve network resilience’. As a unitary authority, Bracknell Forest Borough Council has the opportunity to deliver a more integrated approach to transport and land use planning. This will be important in achieving a number of the objectives of the Bracknell Forest LTP and would be worthy of inclusion as an additional objective.

2.6 The four objectives of the LTP which do not align with any of TfSE’s strategic priorities are as follows:

- Objective 1.4: Deliver high-quality public realm, supporting safe and connected communities;
- Objective 2.3: Support the effective movement of freight across a variety of transport modes;
- Objective 2.4: Effectively manage our highway assets in a sustainable way; and
- Objective 3.4: Encourage the uptake of zero and low emission vehicles;

As a Sub-national Transport Body, TfSE does not have a role in the development and delivery of public realm initiatives nor the management of highway network and hence these aspect of a local transport authority’s role are not reflected in TfSE’s strategic priorities. However, TfSE’s strategic priorities do include reference to the need for improved integration between transport and land use planning which will help support the delivery of a number of the LTP objectives. On supporting freight movement and encouraging the uptake of zero emissions vehicles, TfSE has active workstreams on both these issues as part of its ongoing technical work programme.

### 3. Other Comments

3.1 Although the primary role of an LTP is to guide transport investment and policy in the area covered by a local transport authority, it is important that it takes account of the relationship with the wider geographical area in which it exists. This is particularly important for an area such as Bracknell Forest that is closely interlinked with neighbouring areas via strategic regional corridors such as the M3 and M4. The Draft LTP includes maps showing Bracknell Forest in context of the South East and the strategic road and rail network connections. However there is no reference to the role of any strategic transport improvements outside Bracknell Forest, that may be needed to improve connectivity to the area. In addition, there is no reference to any joint working with the other Berkshire authorities to help secure these improvements. We are also disappointed to see that there is no reference to the role of TfSE in

identifying the strategic infrastructure proposals that will benefit Bracknell Forest and its neighbouring Berkshire authorities as set out in our Strategic Investment Plan.

3.2 Although we are grateful for the extension that has been allowed to prepare this response, the request for an extension was necessitated by the very short timescale that had been allowed for the consultation (25 November to 30 December) which also concluded in the Christmas Break. We would respectfully request that more time is allowed for similar consultation exercises in the future.

[Ends]