Agenda Item 7

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

Date of meeting: **17 March 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.**

RECOMMENDATIONS:

The members of the Partnership Board are recommended to:

1) **Agree the draft response to Western Gateway: Draft Strategic Investment Plan Consultation;**

2) **Agree the draft response to Transport Select Committee's call for evidence on Rail Investment Pipelines: ending boom and bust;**

3) **Agree the draft response to Kent County Council's A229 Blue Bell Hill Improvement Scheme Consultation;**

4) **Agree the draft response to the Integrated National Transport Strategy call for ideas; and**

5) **Agree the draft response to the Department for Transport's – Phasing out sales of new petrol and diesel cars from 2030 and supporting the ZEV transition.**

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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:

- Western Gateway: Draft Strategic Investment Plan Consultation
- Transport Select Committee's call for evidence on Rail Investment Pipelines: ending boom and bust.
- Kent County Council's A229 Blue Bell Hill Improvement Scheme Consultation
- Integrated National Transport Strategy call for ideas
- Department for Transport's – Phasing out sales of new petrol and diesel cars from 2030 and supporting the ZEV transition

2. Western Gateway – Draft Strategic Investment Plan Consultation

2.1 Western Gateway sub-national transport body launched their consultation on their Draft Strategic Investment Plan (SIP) on 20 December 2024.

2.2 TfSE welcomed the opportunity to respond to the consultation which closed on 02 February 2025, and the officer level response that was submitted is contained in **Appendix 1.**

2.3 There is good alignment between Western Gateway's SIP and the goal of TfSE's existing Transport Strategy.

2.4 TfSE supports Western Gateway's methodology as it follows established best practice. The multi-criteria framework assessment approach aligns with TfSE's own evaluation methods.

2.5 The draft response highlights the schemes we have identified in our own strategic investment plan for the neighbouring south east region that are the priorities for TfSE that may impact on the Western Gateway area. TfSE asked that Western Gateway engage in the development of these schemes and potentially support TfSE with their delivery:

- O17: South West Main Line – Digital Signalling
- A10 – West of England Service Enhancements
- O14: Cross Country Service Enhancements

2.6 Finally, in answering the impacts and effects TfSE agrees with Western Gateway's identified impacts, provided they are mitigated where possible. The impact assessment aligns with TfSE's own Integrated Sustainability Appraisal (ISA's). TfSE supports the position that the whole program should achieve net carbon reduction by 2050. The draft response emphasises the need to balance economic growth with social and environmental outcomes.

3. Transport Select Committee – Call for evidence on Rail Investment Pipelines: ending boom and bust.

3.1 The Transport Select Committee sought written evidence addressing a set of questions by 7 February 2025. TfSE submitted an officer level response which is contained in **Appendix 2.**

3.2 The response highlighted how the current 'boom and bust' approach to rail infrastructure planning and funding negatively impacts cost effectiveness. TfSE also noted the short-term, project-by-project planning leads to higher costs and less competitive pricing.

3.3 The response highlights the rail priorities and pipeline of projects that can be planned and delivered over the short and longer term for the next 25 years including:

- Reliable and resilient radial rail connections to and from London
- Enhanced East – West rail connectivity
- Increased ticket integration with reduced costs
- Increased freight on rail to support the Government's 75% rail freight target.

3.4 In relation to funding and partnership working, TfSE noted that they offer scheme development funding to local authorities and that they recognise the need for both public and private sector funding. The response highlights the private sector investment challenges resulting from a lack of clear long-term policy. The response also identifies issues with DfT's Rail Network Enhancements Pipeline (RNEP) updates.

3.5 The response called for:

- Better integrated decision-making between national, regional and local rail planning bodies.
- Long-term government commitment to rail investment priorities and project pipeline planning
- Closer integration between government and rail industry for efficient planning and financing.

3.6 Finally, the draft response highlighted the need for regional collaboration noting the work with other bodies through the Wider South East Rail Partnership which aims to develop integrated planning and longer-term investment priorities. The partnership includes Network Rail, GBR Transition Team, Transport for London and DfT.

4. Kent County Council's A229 Blue Bell Hill Improvement Scheme Consultation

4.1 Kent County Council (KCC) launched their consultation on the A220 Blue Bell Hill Improvement Scheme on 21 January 2025. which closes on 17 March 2025. The response that is due to be submitted is contained in **Appendix 3.**

4.2 The response states TfSE's support the overall scheme proposals but highlights that it's not within our remit to comment on the specific scheme options.

4.3 The strategic importance of the A229 Blue Bell Hill is recognised as it forms a key link between M2 (Junction 3) and M20 (Junction 6) connecting Maidstone and Medway. The scheme was identified as a priority in TfSE's Strategic Investment Plan (SIP) and included in the Major Road Network (MRN) and Large Local Major (LLM) programme submitted to the DfT in 2019. TfSE also noted the current issues and future challenges the scheme faces.

4.4 The following improvements identified are supported in the response:

- Controlled pedestrian/cycle crossings at Running Horse Roundabout
- Widening of existing footpath between Common Road and Salisbury Road Junction

- Enhanced infrastructure for non-motorised users
- Improvements to accommodate expected traffic increases

4.5 Finally, the response highlights in accordance with the Government policy the need to avoid and mitigate environmental impacts, calling for biodiversity net gain throughout.

5. Integrated National Transport Strategy call for ideas

5.1 The Department for Transport (DfT) launched their call for ideas for the Integrated National Transport Strategy (INTS) on 28 November 2024.

5.2 The call for ideas closed on 20 February 2025, and the officer level response that was submitted is contained in **Appendix 4.**

5.3 In response to a question about to how the transport network could be better 'joined-up' the response emphasised that it requires both aligned governance / decision making and practical delivery measures. The response highlighted TfSE's missions-based framework and shift from siloed planning to multimodal packages, noting the focus on inclusion outcomes like reducing social exclusion, improving accessibility, and enhancing safety.

5.4 In response to how could data be used to improve the transport network the response identified several data improvement priorities. The need to address critical data gaps in freight movement, travel demand and spatial coverage was emphasised. Recommendations were included implementing a requirement for transport operators to submit journey data and creating a standardised national planning data portal. The response also highlighted the need to reduce inconsistencies in data used across regions whilst highlighting approaches that could address this.

5.5 In response to how could technology be used to improve the transport network the response emphasised a people and place base approach to deployment. Two priority technology areas were highlighted: Mobility as a Service (MaaS) and Digital Twins. For MaaS, the platform that has been developed in The Solent Future Transport Zone was highlighted in successfully integrating transport choices with payment mechanisms, enabled operator agreements, and facilitated mobility credits trials to influence behaviour change. Digital Twins were identified as a mechanism to develop virtual models incorporating demographic, socioeconomic, and environmental data to identify problems, simulate scenarios, and optimise solutions before implementation.

5.6 Finally, in response to a question about how, the way that decisions are made about the transport network could be improved, the response identified England's fragmented transport policy and delivery system as a key challenge, highlighting how responsibilities are distributed across many different agencies. The response

emphasised that this fragmentation creates a lack of clear strategic multi-modal direction that isn't aligned with funding and implementation powers. The need to break down modal silos was highlighted, while allowing regions flexibility to pursue different paths toward common national outcomes. The Devolution White Paper provides opportunities for better integration of land use and transport planning, noting that STBs are well-positioned to provide regional coordination through their existing strategies, investment plans, and thematic work. The response concluded that successful delivery requires close partnership working across transport sectors, encouraging the INTS to embrace collaboration while respecting regional autonomy.

6. Department for Transport's – Phasing out sales of new petrol and diesel cars from 2030 and supporting the ZEV transition

6.1 The DfT launched their consultation on phasing out sales of new petrol and diesel cars from 2030 and supporting the ZEV transition on 24 December 2024.

6.2 The consultation closed on 18 February 2025, and the officer level response that was submitted is contained in **Appendix 5.**

6.3 The response strongly supports the electrification of the UK car fleet as a vital mechanism for cutting carbon emissions from transport. The response indicates that by 2030, market forces will likely naturally accelerate BEV adoption due to improving battery range, cost parity, and a more developed charging network. Permitting only plug-in hybrids (PHEVs) rather than regular hybrids during the transition period was supported, given their greater environmental benefits.

6.4 In relation to vans the significant challenges in the current market, with BEV uptake at only 6% in 2024 (against a 10% target) was highlighted. The key barrier identified is not technological capability but rather the lack of suitable charging infrastructure for commercial vehicles. The current work that TfSE is undertaking with local authorities was highlighted that seeks to address this through developing demand-driven opportunities for commercially viable charging infrastructure projects and supporting public sector rollout of commercial vehicle charging facilities.

7. Conclusions and recommendations

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

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Western Gateway Strategic Investment plan Consultation Response from TfSE

Introduction

This document is the draft Transport for the South East (TfSE) response to the consultation on Western Gateways Strategic Investment Plan (SIP) Public Consultation. This is a draft officer response that will be presented to our Partnership Board on 17 March 2025 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.

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.

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.

TfSE welcomes the opportunity to respond to the consultation. We trust that our response will provide value to the work of Western Gateway but also form the basis for further engagement, especially on the refresh of our transport strategy throughout 2025 and the refresh of our SIP which will follow.

Strategy

Do we feel any of the five aims of Western Gateway's adopted Strategic Transport Plan are more important than the others and should be given greater weight in your scoring?

The aims identified by Western Gateway are aligned with those outlined in our own Transport Strategy and Strategic Investment Plan.

The TfSE adopted Transport Strategy sets out our Vision which is broken down into 3 goals which are Economic, Social, Environmental

The revised TfSE draft Transport Strategy (currently also out for consultation) proposes the addition of five missions that also align with the aims Western Gateway have set out.

Western Gateway Strategic Investment plan Consultation Response from TfSE

These missions are:

- Strategic connectivity
- Resilience
- Inclusion & Integration
- Decarbonisation
- Sustainable Growth.

I answer to Western Gateways question TfSE do not consider any single aim, mission or objective to be more or less important than another. Different schemes will all contribute to each objective to a greater or lesser extent but all will be needed in order to achieve the strategic objectives overall.

Assessment and Methodology

Do we feel that the methodology described is appropriate for identification of proposals to meet Western Gateway's aims?

Yes, the methodology aligns with the 5 aims set out in the strategy as well as following a multi criteria framework assessment which is widely recognised as best practice and also aligns with the approach TfSE undertook when reviewing proposals in the south east.

Prioritised proposals

Do we generally agree with the outcomes of this assessment?

Unknown/No Opinion

Do we feel the prioritised proposals meet the needs of Western Gateways region?

Unknown/No Opinion

Do we feel there is anything significant missing from this proposed programme?

No

While we have no comment to make regarding anything that is missing we would like to take the opportunity to highlight schemes we have identified in our SIP for the neighbouring south east region that are the priorities for TfSE and may impact on the Western Gateway area. We would also like to ensure that Western Gateway will be engaged and potentially able to support TfSE with their delivery.

Western Gateway Strategic Investment plan Consultation Response from TfSE

Western Gateway may wish to consider any potential impact or benefits of these schemes to the western Gateway region which are:

O17: South West Main Line - Digital Signalling

Introduction of digital signalling on the South West Main Line. This will increase the capacity for (and safety of) rail passenger and freight movements.

Package	Wessex Thames Railway
Phasing	Medium (2030s)
Current programme	South West Mainline Strategic Study/ Main Line Phase 2 Strategic Study
Project stage completed	-
Project stage underway	-
Project stage next step	Feasibility Study
Next step leader	Network Rail

A10: West of England Service Enhancements

Service frequency enhancements between Salisbury and Yeovil Junction. This will support local trips between adjacent centres on the line to be made by rail and reduce the need to travel using private car.

Package	South Hampshire Rail (Core)
Phasing	Medium (2030s)
Current programme	Yeovil Junction to Salisbury Service Enhancement SOBC
Project stage completed	Feasibility Study
Project stage underway	Strategic Outline Business Case
Project stage next step	Outline Business Case
Next step leader	Network Rail

O14: Cross Country Service Enhancements

Reinstatement of Cross Country services between Portsmouth and the Midlands and increased service frequencies and span between Southampton and the Midlands. This will reduce journey times between Portsmouth, Southampton and other national centres and support inbound tourism.

Package	Wessex Thames Railway
Phasing	Short (2020s)
Current programme	Main Line Phase 2 Strategic Study
Project stage completed	Feasibility Study
Project stage underway	-
Project stage next step	Feasibility Study
Next step leader	Network Rail

All of the schemes identified in the TfSE SIP can be reviewed in GIS format using our online story map which can be found here.

Western Gateway Strategic Investment plan Consultation Response from TfSE

Impacts and effects

Do we think the identified impacts are acceptable?

Yes, if mitigated where possible.

The impacts identified are comparable to those TfSE's assessed in our Integrated Sustainability Assessments (ISA'S) for both our adopted Transport Strategy and SIP (and also with those applied for the Draft Transport Strategy).

TfSE's ISA combines several sustainability appraisal processes, so that environmental and social impacts were identified and mitigated as part of our strategy development. The components of our ISA process were:

- Strategic Environmental Assessment (SEA)
- Habitats Regulations Assessment (HRA)
- Health Impact Assessment (HIA)
- Equalities Impact Assessment (EqIA)

Which are aligned to those undertaken by Western Gateway.

It is also important to understand that at the strategic planning stage a precautionary approach is required as any actual impacts will be mostly unknown until the schemes reach option selection and design, at which time it will likely not only be possible but likely a requirement to ensure mitigations are included to minimise or eradicate the impacts where possible.

Western Gateway's assessment of the priority proposals indicates that, in combination, the recommended schemes are likely to have a net beneficial effect on the level of other carbon and greenhouse gases emitted, particularly from active travel and public transport proposals.

Which of the following most closely aligns with our view on the assessment of climate change impacts?

- **Unknown/No opinion**
- **Carbon emissions are not significantly important, or other factors are more important**
- **Carbon emissions have same level of importance as other factors e.g. economic or social**
- **Carbon emissions should be treated as more important than other factors**
- **The whole programme of priority proposals should result in a net reduction in carbon emissions by 2050**
- **Every individual proposal in the recommended programme should reduce carbon emissions by 2050**
- **Other**

Western Gateway Strategic Investment plan Consultation Response from TfSE

The Whole programme of priority proposals should result in a net reduction in carbon emissions by 2050

It is important that STB SIP's support the transition to net zero by 2050. Carbon should always be assessed in whole life terms but This is not possible until schemes reach optioneering and design. It is likely to be similar in Western Gateway area as it is in TfSE where some schemes will support each objective to a varying degree. TfSE support sustainable economic growth which seeks to achieve a balance with social and environmental outcomes. This means economic growth must be viewed as a means to improving the long-term quality of life for residents. There are areas of our own transport strategy that focus explicitly on encouraging economic growth. However, where it does so, it also considers the potential social and environmental consequences this may bring.

Do we think there are any impacts that Western Gateway have overlooked, or have any other comments on the sustainability appraisal?

No, In TfSE's Integrated Sustainability Appraisal we state that we examined the potential impacts our strategy could have on a range of sustainability objectives, including economic, social, and environmental aspects. These include, but are not limited to biodiversity, the historic environment, habitats, carbon, health, and equality of access to opportunities. We feel that our appraisal and Western Gateways are broadly aligned with each other and government objectives.

Do we think the cost (approx. £4 billion) is broadly appropriate for a 10-year regional strategic investment plan?

No Opinion

06 February 2025

Transport for the South East's Response to the Transport Select Committee's call for evidence on Rail Investment Pipelines: ending boom and bust – call for evidence

This is Transport for the South East's (TfSE) draft response to the Transport Committee's call for evidence into its inquiry 'Rail Investment Pipelines: ending boom and bust'. This is a draft officer response that will be presented to our Partnership Board on 17 March 2025 for their approval therefore a further iteration may 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.

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.

Our Strategic Investment Plan (SIP) provides a framework for delivering our Transport Strategy setting out transport infrastructure and policy interventions needed in our region over the next 25 years.

As a strategic transport body, we are not directly involved in the delivery of track enhancements, station upgrades or rolling stock orders. However, we work with our partner local authorities, Network Rail and Great British Railways Transition Team (GBRTT) to identify the rail interventions needed in our area. We are aware from our own experience and discussions with these partners that a 'boom and bust' approach to the planning and funding of rail infrastructure projects has significant negative effects. It severely inhibits their ability to deliver rail infrastructure projects at a cost that represents good value for money for the tax payer.

It is well understood that when contractors are engaged to deliver agreed and pre-planned projects on a long term basis they can provide their supply chain with certainty in terms of what they will need to produce or supply over that planning horizon. This enables the suppliers to offer more competitive unit costs and/or rates that benefit from the resulting economies of scale. In addition they

can hire permanent staff to deliver services at a more competitive cost than those procured on a short term, temporary, one-off or irregular basis.

For the rail industry this planned approach provides the opportunity to develop a pipeline of projects that can give both short and longer term security to contractors and suppliers.

This is particularly relevant during periods of financial constraint in the public sector which tend to result in very short project by project planning horizons, leading to the delivery of fewer projects and lower orders. This can mean suppliers end up looking for more profitable markets elsewhere, including those overseas. In severe economic downturns, they may also reduce their output overall leading to increases in their unit costs.

When the rail industry bodies do get funding for projects they must then negotiate new contracts resulting in those costs being higher and less competitive. This is because the contractors and suppliers either have to increase supply quickly at short notice which is costly or charge higher costs to secure similar profits to those they have previously experienced in alternative markets.

If central government could commit to a longer planning horizon for the rail sector's capital projects and outline funding insofar as is possible, this would allow public authorities to plan ahead with contractors and suppliers. This would mean contractors and suppliers would be ready and waiting for projects to go ahead rather than having to ramp up production at short notice which inevitably costs more.

Sub-national transport bodies, including TfSE, have already set out in their transport strategies and investment plans a series of rail priorities and pipeline projects that can be planned and delivered over the short and longer term for the next 25 years.

For TfSE this pipeline includes:

- Reliable and resilient radial rial connection to and from London
- Enhanced E-W rail connectivity
- Increased ticket integration while reversing real terms increase in cost of public transport
- Increased freight on rail to support the Government's 75% rail freight target.

These priorities would be delivered through eight packages of rail interventions set out in our SIP, consisting of 79 schemes at a capital cost of approximately £24bn at 2020 prices. We also offer scheme development funding to our local authorities and Network Rail to prepare either strategic outline business cases,

feasibility studies and other preparatory work to enable them to progress schemes as soon as government funding becomes available. As such, we have a pipeline of projects that has been agreed by our local authority and other delivery partners such as Network Rail ready and waiting to be delivered. However, this scheme development is currently only limited to a few projects.

A more integrated approach to decision making on establishing priorities and planning between the local transport authorities represented by STBs and Network Rail/GBRTT would provide more opportunities to deliver more shared public sector investment priorities. This would also facilitate better integration between the transport and spatial planning undertaken by national, regional and local bodies to enable the delivery of rail passenger and freight improvements, alongside other priorities such as economic growth and house building.

As suggested above, it would also be more helpful if central government funding commitments, at least at an outline level, could also be made by other potential sponsors who stand to benefit from the interventions. We recognise that long term investment will increasingly need to be funded by both the public and private sectors. However, from our experience, trying to interest the private sector in the full or shared funding of transport infrastructure is very difficult even when fare revenue is available to finance this. This is because there is a lack of a clear long term policy and a transparent and stable pipeline of projects agreed by both the government and its rail delivery bodies. This would provide the private sector with the confidence and certainty it needs to make long term financial commitments. Without this, future investment opportunities will continue to present challenges for investors.

The DfT's 'Rail Network Enhancements Pipeline A New Approach for Rail Enhancements' (RNEP) published in March 2018 is a case in point. It originally included an ambition that the 'Government will consider opportunities for alternative sources of funding and private finance options at each stage of the pipeline.' (page 9). Although issued by the previous government, RNEP was supposed to be updated annually but since 2019 has only been issued once.

We also recognise that there may be opportunities for the newer devolved authorities to use the community infrastructure levy in the way that the London Mayor does but it is not clear that in the shorter term whether this can raise sufficient funds for the level of investment required particularly for larger projects.

In the south east, Transport for the South East, England's Economic Heartland and Transport East are now working with Network Rail, the GBR Transition Team, Transport for London and the DfT in the Wider South East Rail Partnership. The Partnership aims to provide an opportunity to develop a wider integrated planning horizon to enable longer term agreements on investment priorities. The STBs act as a unified, pan-regional voice for the rail needs of the wider south east

through our Partnership Boards and constituent local transport authorities (LTAs), as well as representing the interests of passengers and wider economic stakeholders in our area. We aim to bridge the gap between local, regional, and national priorities, ensuring that the agreed priorities of the wider south east are recognised in decision-making. Our partnership therefore aims to complement LTAs, TfL, Network Rail, GBRTT, and the Department for Transport by offering a strategic and regional perspective that aligns investments with broader economic and environmental goals with our own.

Through this Partnership we aim to support the delivery of closer integration between strategic rail partner decision-making about priorities and their subsequent delivery planning. This would facilitate the preparation of a pipeline of projects for the short and longer planning horizon in our areas. This should result in more competitive pricing by suppliers who can also plan and be involved at an earlier stage with the rail sector bodies responsible for procurement.

In summary, to enable the rail industry to establish clear investment pipelines which could help end the turbulent years of boom and bust and give more certainty to passengers, suppliers and investors, TfSE would like to see:

- a better integrated approach to decision making between strategic public sector bodies involved in rail planning at a national, regional and local level;
- a central and regional government short and long term commitment to rail investment priorities, project pipeline planning and funding; and
- a closer integration between the central government and the rail industry to allow it to plan its involvement more efficiently and secure adequate resources and financing for rail projects on a longer term basis.

[Ends]

Kent A229 Blue Bell Hill Improvement Scheme Consultation Response from TfSE

Transport for the South East welcomes the opportunity to respond to Kent County Council's consultation on A229 Blue Bell Hill Improvement Scheme. This is a draft officer response that will be presented to our Partnership Board on 17 March 2025 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. High-quality transport infrastructure is critical to making the South East more competitive, contributing to national prosperity and improving the lives of our residents.

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. Our Strategic Investment Plan (SIP) provides a framework for delivering our Transport Strategy setting out transport infrastructure and policy interventions needed in our region over the next three decades. Securing the right investment in the MRN is a crucial part in delivering our transport strategy.

The A229 Blue Bell Hill improvements scheme was identified by TfSE as a priority scheme for inclusion within the SIP and was also prioritised for inclusion in the Major Road Network and Large Local Major (MRN/LLM) programme which we submitted to the DfT in 2019, leading to its inclusion in the current programme.

The A229 Blue Bell Hill runs between Junction 3 of the M2 and Junction 6 of the M20. It is a key link between the M2 and M20, and between Maidstone and Medway.

Blue Bell Hill often experiences high volumes of traffic resulting in significant congestion and road safety concerns. These are likely to be made worse by future housing developments in the surrounding area and the proposed Lower Thames Crossing (LTC), which will both generate additional traffic. We support the implementation of improvements that are required to improve journey time reliability, reduce delays and improve road safety

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across this section of the road network. Should the LTC scheme go ahead, traffic on Blue Bell Hill will increase. The proposed A229 Blue Bell Hill Improvement Scheme will be vital to accommodate these expected future increases in traffic,

TfSE welcomes the proposed enhancements including the installation of controlled pedestrian / cycle crossings at the Running Horse Roundabout and the widening of the existing footpath along Blue Bell Hill, between Common Road and the footbridge at the Salisbury Road Junction. We support any opportunities to provide enhanced infrastructure and provision for non-motorised users, which should be included in the design of the preferred option. These opportunities should be delivered as part of the current scheme proposals rather than being subject to separate funding applications that may not be successful.

We consider that in accordance with Government policy every effort must be made to avoid and mitigate environmental impacts and ensure that biodiversity net gain is achieved through the design of this project. We would therefore expect that a high-quality package of environmental mitigation measures will be developed and delivered as part of the scheme.

Whilst TfSE supports the A229 Blue Bell Hill Improvement Scheme, it is not within our remit to comment on the detail of any particular scheme option. As such, we have no comment on the questions in the consultation questionnaire regarding the scheme options and construction/disruption elements.

Integrated National Transport Strategy- call for ideas 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 call for ideas for the Integrated National Transport Strategy (INTS). This is a draft officer response that will be presented to our Partnership Board on 17 March 2025 for their approval. An updated response 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 call for ideas. Alongside the other STBs, we have assisted the Department for Transport in identifying stakeholders to invite to the regional roadshows that are taking place to help inform the development of the INTS.

2. Question Responses

2.1 This document is the draft Transport for the South East (TfSE) response to the call for ideas for the Integrated National Transport Strategy (INTS). This is a draft officer response that will be presented to our Partnership Board on 17 March 2025 for their approval. An updated response may, therefore, follow.

2.2 These questions are those posed by the call for ideas, as shown on the Department for Transport website as of 4 February 2024.

What is the approximate total number of employees in your organisation?

2.3 10 to 49.

What best describes your organisation?

2.4 Another type of organisation (specify) – Sub-national Transport Body

In your opinion, how could the transport network be better 'joined-up'?

2.5 Joining up the transport systems requires work at two levels. The first is about aligning governance and decision making so that the transport system operates as an integrated whole. The second involves practical measures to deliver this.

2.6 The Integrated National Transport Strategy must set out a policy framework that effectively integrates national, regional, and local policies to ensure that integrated transport systems are delivered on the ground. This is not about central government dictating what must be included in regional transport strategies and local transport plans, either by policy or by guidance. Rather, the Integrated National Transport Strategy should, alongside setting out national level missions for transport, establish minimum standards that ensure integration of services and modes at a national level, and set out how the Department for Transport and national agencies such as National Highways and Great British Railways will shift their focus away from modal silos towards focussing on end users.

2.7 The transport strategies and their associated investment plans developed by the STBs establish regional priorities and provide a golden thread between national and local priorities. This ensures that needs of local communities are well understood, and that projects at every scale complement one another, avoiding duplication of effort.

2.8 Existing transport strategies and strategic investment plans produced by the STBs demonstrate the merit of a regional approach to transport planning. They have enabled the development of coherent multi-modal transport strategies that serve the needs to people, businesses, and places within their areas. TfSE has adopted a missions-based framework in its Draft Transport Strategy, to provide a focus for the actions of TfSE and its partners in delivering against a number of major challenges facing the region. Furthermore, in identifying the interventions needed in our region in our Strategic Investment Plan we have moved away from a siloed approach based on modes and networks, to one which identifies multimodal packages of interventions that will better serve the needs of the people and places in our region.

2.9 The delivery of an integrated transport service offering is dependent upon the types of outcomes that government wishes to achieve. In the Inclusion and Integration Mission of our Draft Transport Strategy, TfSE identifies a series of outcomes that encompass different aspects of integration, to achieve its mission of creating "an inclusive and integrated transport network in the South East that offers affordable, safe, seamless, door-to-door connectivity for all users." These are:

- Reduce transport-related social exclusion
- Increased customer satisfaction across all user groups
- Increased proportion of accessible and step-free stations and hubs
- Improved safety across the transport network
- Improved air quality
- Reduction in severance and improvement of the public realm
- Reduced real-term percentage of household income spent on housing and transport costs

2.10 In many cases, the solutions required have been known about for many years. The Inclusion and Integration Policy Route Map, set out in our Draft Transport Strategy contains

many examples of such interventions. These include implementing integrated fares and ticketing systems, delivering improvements identified in Bus Service Improvement Plans, and offering affordable fares.

2.11 TfSE itself is seeking to build upon work undertaken as part of its work with socially excluded groups to better understand its role in providing an integrated and inclusive transport system across the South East. Reflecting this, we would anticipate that, as a minimum, the Integrated National Transport Strategy covers the following areas:

- Focussing investment on new infrastructure and services, including integrated systems, in areas at the highest risk of transport-related social exclusion;
- Upgrading interchange facilities and implementing step-free access at stations and public transport hubs
- Designing transport infrastructure and services to better serve socially excluded groups

How could data be used to improve the transport network?

2.12 Data plays a significant role in improving the transport network in a variety of ways. Whilst data is not a substitute for sound transport planning and good governance, it provides both the evidence to support sound decisions and the means to identify new and improved transport services that will benefit the users of the system.

2.13 Work is needed in several areas to improve the use of data in decision making. Amongst the most important areas are filling existing data gaps, this includes both thematic data gaps such as freight data and travel demand data, and spatial gaps, for example, more detailed bus passenger data and local travel survey data.

2.14 Some data would benefit from central collection by DfT, while others might be more suitable for collection at regional or local level, where DfT could provide guidance and funding support to ensure consistent data standards. Failure to address these issues results in additional data collection costs, duplication of data, not to mention higher costs to the taxpayer.

2.15 As a case in point, TfSE has undertaken a regional travel survey, specifically focussing on the travel habits of people within our region. This is partly because TfSE has sought to understand in more detail the travel habits of the people using its transport network, and whilst regional data from the National Travel Survey and traffic count data is useful, it is limited in scope and coverage, necessitating further data collection and consequently additional cost.

2.16 Throughout our work, we have also identified specific datasets that we consider would fill existing data gaps or benefit from more consistent data standards. These are as follows:

- **Statutory submission of journey data from transport operators**. The Department for Transport already has good experience through the Bus Open Data Service of opening up data sources from private operators. Our experience is that, despite nearly 15 years of advocating for open data, the level of co-operation on opening up

data sources from private operators varies markedly. The government could consider placing a statutory duty on all transport operators (public transport and new mobility services especially) to make available, openly and freely, data on operations and fares that can be used by all, with a gold standard for this being via an Application Programming Interface (API). As a minimum requirement, it would be useful to include passenger count data (e.g. broken down by origin and destinations, hourly), fares, and real time operational data.

- **A national planning data portal**. Planning data, setting out the proposed locations and quantities of new homes and employment sites, is essential to enable the transport infrastructure needs to development to be properly planned for. The experience of TfSE is that planning data based on the information contained in local plans is not collected consistent basis and the quality of data is also very variable. Providing such data is not a statutory duty for planning authorities. This means securing data from local planning authorities on development sites already in their local plans is very time consuming. The completion of a Development Log (D-Log) similar to that pioneered by Transport for the North, should be made a statutory duty for all local planning authorities, so that data on locations and quantities of planned development is openly available. These data should be made available in a variety of data standards, such as in a spreadsheet (CSV or ODS) or API. As well as being useful to those engaged in both transport and land use planning thse data would also be useful for utility companies and statutory agencies such as National Highways and Network Rail.

- **Freight data**. Data on the movement of freight is difficult to obtain due to concerns of freight and logistics operators about commercial confidentiality. Such data is useful to public authorities to help them better understand key freight flows (as opposed to inferences made from traffic count data) and journey patterns, including patterns of stops for driver breaks and rest periods. Having access to this data would help authorities better understand the needs of freight and logistics sector, enabling them to plan much better for associated infrastructure for freight and logistics, including driver rest places and appropriate locations for different types of freight operations. Improvements to the quality and availability of freight data are needed to help address the ‘freight blindness’ suffered by national, regional and local government bodies. This issue would be best addressed through the development of a national freight data strategy led by the Department for Transport. The current Freight Analysis and Modelling Environment (FAME) study led by DfT provides a good opportunity for regional partners including STB’s to collaborate on this issue.

- **Focus on people-centred analysis**. Understanding travel from the perspective of the people using the system is essential to deliver a more integrated national transport system that better serves their needs. Currently, inferences have to be made from existing data sets, including ticketing data, travel surveys, attitudinal surveys, and passenger interviews. Some blending of different datasets is often required to understand individual travel behaviour and choices, This means that significant effort is needed to create useful insights, especially at a local level where achieving a sufficient sample size is more challenging. In addition to opening up existing data sources, effort needs to be expended on identifying data gaps and pioneering new approaches such as the use of AI to analyse data and provide insights into human behaviour.

- **Ensuring data continuity by blending continuous and project specific data**. Transport data is often collected on a project by project basis. Whilst this may be useful in terms of monitoring scheme impacts, continuous monitoring is needed to understand changes in travel patterns and system operations. As well as providing consistent data collection such as traffic and passenger counts, the Department for Transport could work with its partners to identify recommended standards for consistent, project level data collection, so that data can be collected on an ongoing basis.

- **Overcoming barriers to data sharing**. Data sharing between public authorities is more complicated than it should be. There should be a requirement placed on all local authorities to make all of their transport data freely available to the public sector in accessible formats, unless there is a compelling privacy or commercial reason not to do so. Where that is the case, the reason should be clearly and publicly articulated. This could be facilitated through promoting the use of the Creative Commons and Open Data licencing arrangements.

- **Procuring data at scale**. Potentially useful data sources, such as mobile phone data, are under-utilised due to the significant costs associated with purchasing them. The Department for Transport could collaborate with STBs to explore the possibility of procuring such data at scale, and make this data accessible to local authorities who wish to use it.

2.17 At TfSE, we are working closely with our local transport authorities (LTAs) to help address their identified common data gaps. As a result we are currently engaging with various mobile network data providers to explore opportunities for procuring data at a regional level and making it available to all LTAs in the region. By doing so, we can not only achieve significant cost savings compared to individual procurement by LTAs but also ensure data consistency at the regional level. However, to benefit from these economies of scale, funding for the procurement of these data at regional scale needs to be made available.

How could technology be used to improve the transport network?

2.18 The TfSE area is fortunate to be home to several trials of new technologies, notably the Solent Future Transport Zone, and the combined learning of authorities and organisations across the area has influenced our view on the use of technology.

2.19 Our Future Mobility Strategy places an emphasis on delivering new technologies and solutions using a people and place-based approach. Innovation and deployment of new technologies stand the greatest chance of being successful and of scaling up when it is purposeful. For example, our Future Mobility Strategy undertook an assessment of different people and place types to identify a series of “Place-based bundles” where specific types of future mobility solutions have the greatest likelihood of success.

2.20 What this work has indicated is that all manner of different types of technology have the opportunity to be deployed, given the right place and people to make them successful. Much work has already been done to enable the delivery of such technologies and practically deploy them in the field, such as opening up transport data. We are of the view that, in addition to this current work, more specific action is required in two particular areas.

2.21 **Mobility as a Service (MaaS) & Behaviour Change:** MaaS provides a customer-focused platform which integrates information about available transport choices with a payment mechanism. This allows operators of the platform to encourage transport choices and journeys that are optimum for the network, while also being dynamic and flexible to real world conditions. MaaS, as well as other forms of technology (targeted ads, real time info, etc.), can assist with behaviour change measures for short- and longer-term shifts to sustainable modes.

2.22 A MaaS platform has been developed in The Solent Future Transport Zone that not only provides integrated transport choices and journeys, but also has allowed local authorities to leverage agreements with operators, such as consolidating their shared mobility schemes to a single provider. The MaaS platform has given local authorities the opportunity to undertake a mobility credits trial, where participants get a £50 credit each month for 12 months to buy tickets to use on local transport services. This not only taps into behaviour change measures but is also a method of engagement for scheme implementation. Using this technology enhances data availability, allowing local authorities and operators to make informed decisions based on consumer choices and feedback.

2.23 There is the opportunity for the Department for Transport to collaborate more closely with its regional partners to experiment with **new analytical methods**. For example, as part of our regional travel survey, TfSE is investigating the use of traditional analytical methods, such as statistical analysis, alongside new technologies, such as AI, which are well-suited to understanding people's travel decision-making processes. We also plan to explore how these analyses can be used to inform the planning decision-making process.

2.24 **Digital Twins**: These are virtual models of the transport network, incorporate demographic, socioeconomic, and environmental data to identify problems and solutions, simulate scenarios, and optimise options before implementing changes. Their use ultimately leads to more effective planning outcomes. As an STB operating at a regional scale, we are well-positioned to trial the use of digital twins. The scale at which we operate enables us to develop digital twins that would achieve the right balance between spatial coverage and local detail whilst maintaining reasonable demands on computing power.

How, if at all, would you improve the way that decisions are made about the transport network?

2.25 Currently, transport policy and delivery across England is highly fragmented. Within the TfSE area, for example delivery of transport functions sits at a variety of levels, with different levels of responsibility and different abilities to act. For example:

- The Department for Transport sets nationally significant priorities, establishes rules and common standards in a variety of transport domains, and provides funding necessary for most organisations to deliver, either directly through grants or indirectly through subsidy.
- National agencies, such as Network Rail and National Highways, manage, enhance and maintain strategic road and rail networks, even when the connectivity provided by such networks is primarily local.
- Local transport and highway authorities manage local highway infrastructure, and in some cases procuring public transport services, or influencing public transport services through partnerships with operators.

- Local planning authorities making decisions on planning applications, as well as some limited transport powers such as taxi licencing. This is not just District, Borough and Unitary Councils, but also National Park Authorities
- Local public transport operators, who run local public transport services either commercially or under contract.

2.26 This results in a lack of clear, strategic multi-modal direction, that importantly is not aligned with funding and powers to take action. A learning experience from our strategy development work is that policy outcomes can be poorly understood, and in trying to achieve a multi-modal strategic and integrated direction for transport across the country, they sometimes make no sense. This is especially true for decision makers who may not be transport experts, but instinctively understand the value that good transport provides.

2.27 Achieving this direction does not just require consistent objectives and outcomes across all modes of transport. It requires breaking down the modal silos in the planning and delivery of services. Whilst a transport strategy cannot directly tackle matters such as working culture and attitudes, it can set out the missions that the government expect local, regional and national bodies to work on, and set out the approach expected towards delivering these missions. STBs have sought to address this issue through the development of their transport strategies and investment plans by adopting a multimodal approach rather than one based on individual modes and networks.

2.28 Even with an Integrated National Transport Strategy in place, there will continue to be ongoing challenges associated with co-ordinating priorities. Different regions and local areas will continue to have different priorities, even if the outcomes that they seek may be consistent (for example achieving net zero by 2050). The Integrated National Transport Strategy needs to take account of this. Whilst there may be outcomes defined at a national level, the path taken in different areas of the country in achieving those outcomes is likely to be different, and as a result regions and local areas need to have the flexibility to continue plot their own path.

2.29 There is a significant opportunity to do this within the new arrangements for devolution set out in the Devolution White Paper. This places greater emphasis on local areas, especially new Strategic Authorities, to deliver significant improvements to their transport networks and local economies. The new powers proposed also offer the opportunity to better integrate land use and transport planning through Local Transport Plans and Spatial Development Strategies that will be developed by the newly formed strategic authorities. The White Paper also recognises the need for Mayors of Mayoral Combined Authorities to continue to come together co-ordinate their approach to the planning and delivery of transport, planning, energy, water and other infrastructure. The STBs are already well placed to able to continue to provide the mechanism for this regional coordination on transport matters through their transport strategies, strategic investment plans and their work in a number of thematic areas including decarbonisation, freight, rural transport, and electric vehicle charging infrastructure. They also work to improve capability in their areas through their centres of excellence and the analytical frameworks they have developed provide the evidence to support the development of business cases for larger scale interventions.

2.30 The delivery of strategic planning and priorities requires close partnership working across transport sectors and different organisations with unifying goals and outcomes in mind. The Integrated National Transport Strategy can embrace, and encourage, ideas on partnership working and collaboration, and establish these as means by which goals in the

Integrated National Transport Strategy can be achieved. It can set an expectation that achieving common goals and delivering true partnership working is what government is seeking whilst respecting the rights of regions and local areas to choose their own path in achieving these goals through regional transport strategies developed by STBs and local transport plans developed by strategic authorities.

Any other comments?

2.31 No comments.

Department for Transport Public Consultation - Phasing out sales of new petrol and diesel cars from 2030 and supporting the ZEV transition

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 Department for Transport's consultation on phasing out sales of new petrol and diesel cars from 2030 and supporting the ZEV transition. This is a draft officer response that will be presented to our Partnership Board on 17 March 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 this consultation which requests feedback on proposals for supporting the UK's transition to zero emission vehicles. We trust that our response will provide value to the work of the Department for Transport, but also form the basis for further engagement, especially on the refresh of our transport strategy throughout 2025, as well as our ongoing work regarding the rollout of EV charging infrastructure across the south east of England.

2. Consultation Response

Part 1: 2030 phase out of new ICE cars, and CO_2 requirements for vans

Question 1: Do you agree with the Government's view that full hybrid and plug-in hybrid technologies only should be considered? Please explain your answer.

TfSE supports the electrification of the UK car fleet as a vital mechanism for cutting carbon emissions from the transport sector.

The trajectory in the ZEV Mandate compels penetration of BEV in annual new car registrations to meet or exceed 80% by 2030 and 100% by 2035. The decision to allow only a declining

percentage of diesel, petrol or hybrid vehicles to be newly registered between 2030 and 2035 will have little impact on the overall penetration of net zero vehicles within the car fleet.

Supply - To satisfy their long-term production planning, manufacturers will have had to take decisions by 2030 as to which mix of drivetrains optimise production efficiency. On their journey to the 2035 phase out date, it may well be that a second option (whether hybrid or ICE) may not deliver such efficiency.

Demand – By 2030, there is likely to be little consumer resistance to BEV based on (i) improving battery range and fuel efficiency, (ii) cost parity, (iii) the presence of a much more developed public charging network and (iv) growing scarcity of convenient petrol/diesel supply.

For both of these supply and demand focussed observations, it is likely that the market itself will both accelerate the adoption of BEV and take decisions as to specific fuel requirements (i.e., petrol, diesel or hybrid) for specialty vehicles and use cases (e.g., blue light fleet, etc) that may not at that time have been addressed by BEV.

Question 2: Do you prefer a technological definition that permits both HEVs and PHEVs, or a technological definition that permits PHEVs only? Please explain your answer.

We prefer a technological definition that permits PHEV only. This is because there is little difference in carbon emissions between HEV and petrol or diesel vehicles (whether the HEV be "light" hybrid or other). Based on the trajectories specified within the ZEV Mandate, and our assessment of market conditions by 2030, there is likely to be little appetite either from manufacturers ("supply") or consumers/commercial drivers ("demand") for HEV over and above what may be present for diesel and petrol vehicles.

Question 3: Do you support no further CO_2 requirements, a vehicle level CO_2 cap, or a fleetwide CO_2 requirement? Please explain your answer.

No Response.

Question 4: Should a minimum range be required for new PHEVs and, if so, at what level should it be set? Please explain your answer.

No Response.

Question 5: Do you agree with the Government's intention not to establish a technological definition for the specification of new non-ZE vans that may be sold from 2030? Please explain your answer.

Yes, there is no benefit in establishing a technical definition for the specification of new non-ZE van variants (i.e., a "Euro 7" standard) that may be sold from 2030 outside that already established for BEV. In establishing the 75% benchmark for penetration of BEV in new van registrations by 2030, government has signalled its conviction that BEVs already demonstrate sufficient technical capabilities to satisfy most commercial van use cases.

However, the absence of charging facilities for fleet vehicles is seriously inhibiting the uptake of BEV by commercial fleet operators with the result that in 2024 the penetration of new van

registrations is only 6%, well below the ZEV trajectory of 10%. Rather than establishment of a reduced CO_2 requirement for vans from 2030, the market would be better served by government intervention in reinforcing the charging network for commercial vehicles.

Our recent work in anticipating the emergence of demand for BEV charging resources from commercial fleet operators demonstrates the need to establish additional supply of 'en route' charging infrastructure. We are now working with local transport authorities in our area to address both (i) demand-driven opportunities for commercially viable charging infrastructure projects that will deliver conveniently located facilities to commercial fleet operators and (ii) the challenges faced by the public sector in rolling out commercial vehicle-focussed charging resources on publicly owned land.

We anticipate that this intervention by the public sector will enhance the appetite of commercial van operators to accelerate adoption of BEV within new van registrations in compliance with the ZEV trajectory.

Question 6: What are your views on establishing a CO_2 requirement for vans from 2030? What is your preferred measure, if any, and at what level should the target be set? Please explain your answer.

We acknowledge that questions 5, 6 and 7 refer only to the period between 2030 and 2035 and that the ZEV Mandate is to remain in its current form through to 2030.

Whilst we cannot comment on the technical opportunity for manufacturers to satisfy a newly defined CO_2 cap, we are concerned with the regulatory cost of enforcing a more ambitious non-ZEV fleet average CO_2 requirement. We further observe that:

- *BEV penetration of commercial vans is far below that specified by the ZEV Mandate's trajectory,*
- *BEV technical specifications satisfy most commercial van use cases,*
- *BEV adoption by commercial van operators is inhibited by:*
    - *An as yet, underdeveloped recharging solution,*
    - *Challenges in financing and depreciating higher priced BEV vans,*
    - *Delayed formation of a robust second hand market both to make BEV available to small-and-medium-sized-enterprises (SME) that dominate operation of vans over 36 months old, and to validate residual values on which newly registered vehicles are financed, and;*
    - *Other factors not impacted by the lack of a hybrid option in newly registered BEV vans.*
- *Decisions taken around that declining allowance for non-ZEV new van registrations from 25% to 0% between 2030 and 2035 has little impact on the overall penetration of BEV and indeed non-ZEV into our registered van fleet.*

Therefore, while we cannot comment on the definition of a new or additional non-ZEV requirement and we do acknowledge the absence of compelling hybrid variants, we also acknowledge the potential for commercial van use cases that may not be entirely satisfied by BEV vehicle specifications and concede that there may be market requirement to allow the sale of diesel-powered vans (whether to the existing 2011 emissions standard or otherwise) within that declining allowance for non-ZEV new van registrations from 25% to 0% between 2030 and 2035.

Question 7: What would be the impact to the economy and to UK society of any new or additional non-ZEV CO_2 requirements in the van sector from 2030? Please explain your answer and provide evidence where possible.

Economic sectors served by commercial van operations are vital to the UK. Furthermore, according to government statistics, vans comprised only about 12% of the registered vehicle fleet in 2023[1], but they represent 18% of total miles driven and a comparable amount of greenhouse gas emissions from road transport[2]. Therefore, their conversion to ZEV is vital if these emissions are to be reduced.

The inhibitor to BEV uptake by commercial van operators is not the absence of a hybrid alternative, but rather the "key asks" included in the Zero Emission Van Plan created by BVRLA, Logistics UK, Recharge UK, the Association of Fleet Professionals and the EV Café ***(Zero Emission Van Plan 2024.pdf)*** *including:*

- *Increased fiscal support including grants to make new and used e-vans affordable,*
- *Regulatory and fiscal support for accessible, affordable and fit for purpose chargepoints and*
- *Full alignment of 4.25t ZEVs with diesel vans and classified as a van not an HGV.*

Question 8: What are your views on current measures to support demand for zero emission vehicles? What additional measures could further support the transition?

*The penetration of BEV within new car registrations in 2024 of approximately 20% has been largely in line with the ZEV trajectory. Transport and Environment goes so far as to indicate that the automotive industry has complied with the mandate (**Car industry complied with UK ZEV mandate… | Transport & Environment**). However, the Society of Motor Manufacturers and Traders (SMMT) indicates that the sector may have discounted pricing by £4.5 billion to achieve such sales (Record EV market share but weak private demand frustrates ambition - SMMT).*

[1] VEH0105: Licensed vehicles at the end of the quarter by body type, fuel type, keepership (private and company) and upper and lower tier local authority: Great Britain and United Kingdom
[2] TRA0101: Road traffic (vehicle miles) by vehicle type in Great Britain

The table to the right reflects information from SMMT's January 2025 report of 2024 performance. Whilst the penetration of BEV within new car registrations is far stronger in the fleet market than in the private and business sectors, the stronger uptake by fleets reflects the availability of the tax incentives available to beneficiaries of company car and salary sacrifice schemes.

EV Penetration of Total New Registrations 2024

figures in thousands	Fleet	Personal and Business
Total New Car Registrations	1,164	789
New BEV Registrations	303 (26%)	79 (10%)

Source: Derived from SMMT

On closing its plug-in car grant scheme in 2022, government asserted that the program had, "succeeded in creating a mature market for ultra-low emission vehicles". Now, the Department for Transport asserts that, "in many cases ZEVs are significantly cheaper to run, maintain and repair than their petrol and diesel counterparts".

The value of tax incentives delivered through company car and salary sacrifice schemes and price discounting of £4.5 billion indicated by SMMT, already defray customers' exposure to retail price premium of BEVs.

In the face of increasing levels of EV adoption specified by the ZEV Mandate, government could elect to reinstate some form of plug-in grant scheme (or extend and increase the scheme for vans). However, to avoid artificial price inflation for BEVs (including transfer of value directly to manufacturers reducing their exposure to market pricing), such scheme should incorporate acknowledgement and even promotion of identified total cost of operation (TCO) that underlies government's statement within "Phasing out the sale of new petrol and diesel cars from 2030 and Support for the Zero Emission Transition".

As well as support for the vehicles, support is also needed to develop the right charging infrastructure in the right place. Vans are less likely to have access to private charging and need to recharge more frequently due to their higher mileages and lower efficiency than cars. The provision of publicly available infrastructure is therefore crucial to their adoption. Sub-national transport bodies (STBs) are well placed to develop and make available accurate regional forecasts for demand to support the development and supply of commercial fleet focused charging infrastructure.

Over the course of 2023/2024, TfSE undertook a 12 month project with the support of specialist consultancies Steer and Mitie to develop forecasts for electric-fleet vehicle, energy and charging infrastructure demand. Unlike other national forecasts that use registration data, this forecast was based on where vehicles actually operate. We used ONS UK Business Workbook data to segment the van fleet based on the size of business and different industry sectors and to assign assumptions about their mileage and about where they might have access to charging. The resulting aggregated energy demand suggests that 42% of energy needs will need to be met at publicly accessible chargepoints. We would like to rollout out this methodology across all the other STB geographies and continue to develop and refine the outputs of this work. We will also continue to support our constituent authorities in their utilisation of this resource to take the next steps in supporting the development of van-friendly charging infrastructure.

Question 9: What are your views on whether small volume manufacturers (between 1,000 and 2,499 registrations) should be subject to the 2030 requirements for cars and/or vans?

No Response.

Question 10: What are your views on whether micro-volume manufacturers (fewer than 1,000 annual registrations) should be subject to the 2030 requirements for cars and/or vans?

No Response.

Question 11: What is your opinion on exemptions for Special Purpose Vehicles from the 2030 requirements for cars and vans?

No Response.

Question 12: What is your opinion on exemptions for kit cars from the 2030 requirements for cars and vans?

No Response.

Part 2: Vehicle Emissions Trading Schemes Updates

Question 13: Are the time limits on the current flexibilities in the ZEV Mandate for cars and for vans still appropriate? Please explain your answer.

Yes for Cars - Based on uptake of BEV cars in 2024 that very nearly met the ZEV standard of 22%, we see no imperative to adjust current flexibilities. While many manufacturers have been compelled to access these flexibilities, we understand that no manufacturer was fined in 2024. It appears likely that all manufacturers will be able to accelerate production of BEV and promotion to the UK market to avoid fines throughout the term of the ZEV Mandate.

No for Vans - At roughly 6%, the 2024 uptake of BEV vans in the UK fell below the ZEV Mandate's standard of 10%. This shortfall can be attributed to a number of factors outside of manufacturer's control including:

- *A yet underdeveloped recharging solution – the majority of the publicly accessible charging infrastructure rolled out to date has not been designed for vans that require larger bay sizes;*
- *Challenges in financing and depreciating higher priced BEV vans;*
- *Delayed formation of a robust second-hand market both to make BEV available to small-and-medium-sized-enterprises (SME) that dominate operation of vans over 36 months old and to validate residual values on which newly registered vehicles are financed; and*
- *Other factors not impacted by supply of new BEV vans.*

Question 14: What are your views on the proposal to implement a van-car transfer in VETS? Please explain your answer.

The implementation of a one-way transfer of excess van allowance to the car scheme would not incentivise manufacturers to increase supply of BEV vans creating a small average annual CO_2 saving. The adoption of BEV vans by commercial fleet operators is currently inhibited by a range of factors outlined in our responses to questions 7 and 13 above rather than a shortage of supply.

Furthermore, a bi-directional model may further inhibit BEV van uptake as manufacturers are far more likely to over-achieve in creating CRTS allowances than VRTS allowances, creating an opportunity to "shield" shortfalls in compliance with the van trajectory in the ZEV Mandate.

Question 15: Are there other flexibilities that should be considered within VETS for cars and vans?

No for cars – We observe that the performance of manufacturers against the 2024 trajectory in the ZEV Mandate has been satisfactory and that any additional flexibilities might obstruct the market's incentive to fulfil government's objective that all new car registrations will be zero-emission by 2035.

Yes for vans – We observe that uptake of BEV vans is currently obstructed by factors other than supply and that manufacturers are unlikely to achieve compliance with the van trajectory of the ZEV Mandate. These factors addressed in our response to questions 7 and 13 generally comprise:

- *Increased fiscal support including grants to make procurement and finance of new and used e-vans affordable,*
- *Regulatory and fiscal support for accessible, affordable and fit for purpose chargepoints addressing the current under-development of a refuelling solution for commercial van operators,*
- *Formation of a robust second hand market both to make BEV available to small-and-medium-sized-enterprises (SME) that dominate operation of vans over 36 months old and to validate residual values on which newly registered vehicles are financed and*
- *Full alignment of 4.25t ZEVs with diesel vans and classified as a van not an HGV.*

While we anticipate that government may need to add incremental flexibilities or more broadly adjust the van trajectory within the ZEV Mandate, we also observe a regulated trajectory to be fundamental to manufacturer's facilitation of government's objective of ensuring that all new vehicles registered after 2035 will be zero-emission. Such trajectory is a significant improvement over comparable regulation in the EU, which is not supported by such a trajectory.

Question 16: Do you agree that VETS should be amended to account for the UF change? If so, do you agree with the proposal set out? Please explain your answer.

No Response.

Question 17: Do you agree with the proposal to allow UK derived or EU derived WLTP specific emission reference targets to apply from 2021-2023 in the United Kingdom, and in 2024 in Northern Ireland? If not, why?

No Response.

[Ends]