

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 these 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 be 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.