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Assistant Director
Economy, Transport and Environment Department
East Sussex County Council
County Hall
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Dear James

TfSE Response to the East Sussex Draft Freight and Rail Strategies

Thank you for the opportunity to review and comment on East Sussex County Council's (ESCC) draft Freight and Rail Strategies. This is a draft officer response that will be presented to our Partnership Board on 21 July 2025 for their approval. Therefore, a further iteration may follow.

Each strategy sets out clear evidence of the challenges facing East Sussex including the increasing numbers of heavy and light goods vehicles (HGVs and LGVs) on congested A and B roads and the lack of an accessible and reliable rail network that provides an attractive alternative to the car for all parts of the county. TfSE welcomes the ambitious range of investment priorities that are identified to address these and other challenges as set out in the strategies.

Draft East Sussex Freight Strategy

We support the ambition set out in the freight strategy as it aligns well with our Transport Strategy's missions for sustainable growth and decarbonisation as well as the strategic actions outlined in our Freight, Logistics and Gateways Strategy. We look forward to working with the ESCC on those priority investments that represent common areas of interest.

Comments on the draft freight strategy's priority investment areas

- TfSE welcomes the recognition of issues faced by the freight sector, for example the lack of suitable lorry parking and provision of driver welfare facilities and the need to increase these in East Sussex.
- We also welcome the plans to decarbonise the freight transport by promoting more HGV and LGV electric vehicle recharging facilities,

collaborating with others such as Network Rail to increase the capability and capacity of the rail freight terminal at Newhaven Port, and planning for zero-emission vehicles for the Council's own vehicle fleet.

- We agree with the need to introduce better freight-related planning through the mandated use of construction and business-related logistics and delivery and servicing plans, but we recognise that it will require extensive engagement with the stakeholders concerned.
- We welcome the recognition of the need for better freight awareness in the public sector, particularly for those working in local planning authorities. We will support ESCC's plans to address this through the delivery of freight knowledge and understanding workshops that highlight the importance of implementing freight initiatives.

Draft East Sussex Rail Strategy

We support the County's rail strategy as it aligns well our own Transport Strategy's goals for strategic connectivity, resilience, inclusion and integration, decarbonisation and sustainable growth. Some of investment priorities align well with those contained in the current TfSE Strategic Investment Plan.

TfSE comments on the rail strategy priority investment areas

- TfSE welcomes the plans for improved accessibility through integrated and active travel projects, and the plans for behavioural change projects to promote mode shift and increase rail use.
- TfSE supports ESCC's desire to roll out the mobility hubs at Uckfield and Polegate stations and recognises the challenges in better integrating train and bus journeys. In particular, these include the need to work with bus operators to improve connection reliability, align multiple train and bus arrivals, and provide more onward journey destinations.
- We support the ambition to encourage multimodal planning information provision, enhanced multimodal and contactless ticketing, and better cycle storage provision.
- We support collaboration with train operating companies to enhance the customer experience at stations as the projects included in the strategy could be achieved with limited funding.
- TfSE supports the County's ambitions for improving rail resilience and reliability, but many of the interventions listed will be dependent on the availability of government funding to Network Rail and Great British Railways (GBR) once established.

- TfSE also supports ESCC's desire to achieve the electrification of the Hurst Green to Uckfield and Ore to Ashford routes, the re-opening of the Uckfield-Lewes and Spa Valley lines and improvements to the Marsh Link line. However, these and the plans for journey time improvements included in the strategy will rely heavily on the availability of funding, additional staff, rolling stock, and changes to rail infrastructure. Therefore, they will also depend on Network Rail and their train operators, whether commercially run as now or re-nationalised in the future. The Council should consider making these constraints much clearer in the strategy to manage residents' expectations.

Rail Strategy delivery timescales and funding options

The strategy presents strong evidence to support the need for many of the infrastructure and operational improvements on the East Sussex rail network and recognises the long delivery times. However, it is likely the delivery times will be longer than those currently anticipated. This is because the constrained funding position of both National Rail now, and GBR in the future, as well as the government's prioritisation of other regional projects means many of these projects are unlikely to be delivered until Control Periods nine and 10.

The Council should consider making it explicit that while private funding may be available for some of the planned rail priorities in the future, there is currently little appetite amongst private investors to take on the risk associated with building new rail lines or running new rail services. This will make it difficult to attract private funding.

Rail scheme business cases

ESCC recognises the current focus on the value of travel time in the government appraisal methodology, particularly regarding rail business cases. However, it should be noted that connectivity itself is not a benefit which is valued as part of its appraisal process. Therefore, it is almost impossible to produce benefit-cost ratios sufficiently high (2 or above) for rail schemes solely focused on connectivity. The Council should consider developing business cases for these types of rail schemes alongside other modal and economic improvements to help produce better benefit-cost ratios. Although revisions are expected to the appraisal guidance as a result of changes to the HM Treasury Green Book, these are not likely to make appreciable differences for rail-only connectivity schemes.

Delivery proposals for both strategies

We acknowledge that the staged approach described in the strategies is key to the successful delivery of the interventions. We also share the Council's belief that the ongoing engagement and dedicated partnerships outlined in both strategies are essential to ensuring that these investment priorities are well understood and supported by the delivery partners. This is particularly important for external partners such as planning authorities, freight and logistics operators or their representatives, Network Rail and GBR. Ongoing engagement with the Department of Transport and other decision-makers, including the new mayoral combined authorities and other regional and local authorities will also be paramount acknowledged in both strategies.

Funding

As acknowledged in both strategies, funding will be a key issue for the timely delivery of investment priorities and this should be made more explicit in the strategies. While there may be funding opportunities available as a consequence of the creation of the new mayoral combined authorities, consideration will need to be given to exploring wider funding opportunities from organisations such as [Innovate UK](#) and the [Community Rail Network](#).

In summary, TfSE welcomes both the East Sussex draft freight and rail strategies and the ambitions to deliver investment priorities that should greatly improve the movement of goods and passengers. Despite some of the constraints mentioned above, TfSE will look to support these plans, for example by facilitating contact with freight and logistics operators or their representatives, Network Rail/GBR and other stakeholders, and providing advice on the development of business cases.

We also have some suggested text changes. These will be shared with the Local Transport Planning Team separately.

Yours sincerely

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Transport for the South East.