

Report to: Partnership Board –Transport for the South East

Date of meeting: 21 July 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 Letter of Support for Kent Sussex Connect;
 - 2) Agree the draft response to East Sussex Coast and Marshlink Strategic Study's request for comment;
 - 3) Agree the draft response to Department for Transport Consultation "A Railway Fit for Britain's Future";
 - 4) Agree the draft response to the call for evidence from the Chartered Institute of Highways and Transportation concerning the challenges being faced with the roll out of Electric Vehicle Charging Infrastructure; and
 - 5) Agree the draft response to the consultation from East Sussex County Council on both their Freight Strategy and Rail Strategy.
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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:

- The proposal for Kent Sussex Connect
- East Sussex Coast and Marshlink Strategic Study request for comment
- Department for Transport Consultation "A Railway Fit for Britain's Future"- Response from Transport for the South East
- Call for evidence from the Chartered Institute of Highways and Transportation concerning the challenges being faced with the roll out of Electric Vehicle Charging Infrastructure; and

2. Letter of Support for Kent Connect by TfSE

2.1 Earlier this year the TfSE Chairman met with the Kent Sussex Connect team who have set out proposals to improve the Marshlink between Hastings and London

via Ashford. TfSE were subsequently asked whether we would be willing to provide a letter of support to their proposals. This letter is contained in **Appendix 1**.

2.2 Their proposals align well with our Strategic Investment Plan (SIP) and TfSE remains open to collaboration with Kent Sussex Connect, consistent with those objectives set out in our SIP.

3. East Sussex Coast and Marshlink Strategic Study request for comment

3.1 Network Rail shared the latest findings regarding the unpublished Draft East Sussex Coast and Marshlink Strategic Study, seeking TfSE's comment as key stakeholders. TfSE submitted a response on 04 June 2025 contained in **Appendix 2**.

3.2 The response sought the view of and incorporated the comments we received from both ESCC and KCC to ensure our alignment without repetition. The response states that TfSE is generally supportive of the approach Network Rail have taken in the current financial climate, however the response also encourages caution and discretion over the elements of the study that can raise expectations and that were not included in our SIP.

4. The Department for Transport Consultation "A Railway Fit for Britain's Future" Response from Transport for the South East

4.1 The Department for Transport undertook a consultation titled "A Railway Fit for Britain's Future". This consultation covers legislative measures that will form part of a new Railways Bill, which would create and empower Great British Railways, set up the new passenger watchdog, streamline the regulatory regime and carry out structural reform. TfSE have drafted an officer response that is contained in **Appendix 3**.

4.2 The response broadly supports the Government's proposals for the Railways Bill, establishment of GBR and the creation of a new passenger watchdog. However, the response highlighted the need for further clarification in places and are also pointed to significant omissions.

5. Call for evidence from the Chartered Institute of Highways and Transportation concerning the challenges being faced with the roll out of Electric Vehicle Charging Infrastructure

5.1 The Chartered Institution of Highways and Transportation launched their call for evidence on the Challenges in Rolling Out Electric Vehicle Charging Infrastructure (EVCI) on 21 May 2025. TfSE submitted the draft officer level response, contained in **Appendix 4**.

5.2 The draft response provided insight captured directly from local transport authorities through the engagement activity carried out as part of TfSE's recently completed EVCI 'state of the region' report. The draft response highlights the issue of

publicly available charging infrastructure needing to cater for commercial fleet vehicles, as well as privately owned electric vehicles.

6. East Sussex County Council consultations on both their Freight Strategy and Rail Strategy

6.1 East Sussex County Council have undertaken consultations on both their Rail Strategy and Freight Strategy. The draft East Sussex Rail Strategy 2025-2050 sets out the future vision for the delivery of improvements to rail travel in East Sussex, specifically on passenger journeys. The draft East Sussex Freight Strategy 2025 - 2050 sets out the future vision for the delivery of improvements to the movement of freight in East Sussex. TfSE submitted the draft officer level response contained in **Appendix 5**.

6.2 The draft response welcomes both the draft freight and rail strategies and the ambitions to deliver investment priorities that should greatly improve the movement of goods and passengers. 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.

6.3 The draft response highlights how 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.

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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Chief Officer
Transport for the South East

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Ray Chapman
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Dear Ray,

Ref: Support for the Kent Sussex Connect Project

I am writing on behalf of Transport for the South East (TfSE), to lend our support to the Kent Sussex Connect project and highlight its alignment with our own objectives. This is a draft officer response that will be presented to our Partnership Board on 21 July 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.

TfSE provides a mechanism for its constituent authorities and other partners to speak with one voice on the transport interventions needed to support sustainable economic growth across its geography. High-quality transport infrastructure is critical to making the South East more competitive, contributing to national prosperity and improving the lives of our residents.

TfSE have published a [Strategic Investment Plan \(SIP\)](#) to help both government and LTAs prioritise investment in our region. The packages detailed in the SIP address eight investment priorities aligned with the vision and strategic goals of the TfSE Transport Strategy and the wider regional and national policy context. The SIP provides a framework for investment in strategic transport infrastructure, services, and regulatory interventions in the coming three decades.

The current SIP represents the culmination of five years of technical work, stakeholder engagement, and institutional development. It is underpinned by a credible, evidence-based technical programme that has enabled TfSE and our partners to:

- Understand the current and future challenges and opportunities in the south east.
- Identify stakeholder priorities for their respective areas of interest.
- Evaluate the impacts of a wide range of plausible scenarios on the south east's economy, society, and environment.
- Develop multi-modal, cross-boundary interventions.



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- Assess the impact of proposed interventions on transport and socio-economic outcomes; and
- Prioritise the interventions that best address the south east's most pressing challenges and unlock the south east's most promising opportunities.

As we identified in our [Outer Orbital Area Study Options Assessment Report](#) which forms part of the evidence base for the SIP. The Marshlink railway is inadequate to meet future aspirations for stakeholders in East Sussex and Kent and is a key element supporting our vision.

The Marshlink railway currently faces constraints including limited capacity, lack of electrification, and relatively slow journey times. Operating services on this “island” of diesel operation is expensive and inefficient. The railway offers poor east-west connectivity for the communities it serves. It also contributes to the relative “isolation” of Bexhill and Hastings. Stakeholders believe this connectivity gap makes it harder to attract investment to these towns. There are aspirations to use this railway to run high speed services from London St Pancras to Hastings, Bexhill, and Eastbourne via Hastings. This would help develop Ashford as an international transport hub (and strengthen the case for the long-term sustainability of international rail services at this station). However, the quality (and traction) of this railway presents a significant barrier to this project.

In our SIP we have identified as part of our High Speed Rail East package for Kent, Medway, and East Sussex, proposal T2 - High Speed 1 / Marsh Link - Hastings, Bexhill and Eastbourne Upgrade which identifies the need for new high speed services to Hastings, Bexhill and Eastbourne via High Speed 1 / the Marshlink Line to markedly reduce journey times between these locations and London.

TfSE is committed to supporting strategic interventions that align with our long-term transport vision and investment priorities. While we acknowledge the current constraints around delivering high-speed services via the Marshlink Line, we welcome innovative approaches that could address these barriers. TfSE remains open to collaboration with Kent Sussex Connect and other partners to explore opportunities for accelerating the development and delivery of strategic solutions in this corridor, consistent with the objectives set out in our Strategic Investment Plan.

Your sincerely

Cllr Keith Glazier
Chair Transport for the South East

Draft East Sussex Coast and Marshlink Strategic Study Response from TfSE

Transport for the South East welcomes the opportunity to comment on Network Rail's Draft East Sussex Coast and Marshlink Strategic Study. This is an officer response following TfSE's involvement as a stakeholder and attendance of study meetings at the Depot Lewes and over Teams.

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.

TfSE have published a [Strategic Investment Plan \(SIP\)](#) to help both government and LTAs prioritise investment in our region. The packages detailed in the SIP address eight investment priorities aligned with the vision and strategic goals of the TfSE Transport Strategy and the wider regional and national policy context. It provides a framework for investment in strategic transport infrastructure, services, and regulatory interventions in the coming three decades.

The current SIP represents the culmination of five years of technical work, stakeholder engagement, and institutional development. It is underpinned by a credible, evidence-based technical programme that has enabled TfSE and our partners to:

- Understand the current and future challenges and opportunities in the south east.
- Identify stakeholder priorities for their respective areas of interest.
- Evaluate the impacts of a wide range of plausible scenarios on the south east's economy, society, and environment.
- Develop multi-modal, cross-boundary interventions.
- Assess the impact of proposed interventions on transport and socio-economic outcomes; and
- Prioritise the interventions that best address the south east's most pressing challenges and unlock the south east's most promising opportunities.

As we identified in our [Outer Orbital Area Study Options Assessment Report](#) and [Solent and Sussex Coast Strategic Programme Outline Case](#) (which form part of the evidence base for the SIP), east – west rail connectivity (journey times and frequency) is poor, especially compared to radial rail services. Rail capacity is insufficient to accommodate the needs of long-distance passenger, local

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passenger, and rail freight customers. The Marshlink railway is inadequate to meet future aspirations for stakeholders in East Sussex and Kent and is a key element supporting our vision.

The Marshlink railway currently faces constraints including limited capacity, lack of electrification, and relatively slow journey times. Operating services on this “island” of diesel operation is expensive and inefficient. The railway offers poor east-west connectivity for the communities it serves. It also contributes to the relative “isolation” of Bexhill and Hastings. Stakeholders believe this connectivity gap makes it harder to attract investment to these towns. There are aspirations to use this railway to run high speed services from London St Pancras to Hastings, Bexhill, and Eastbourne via Hastings. This would help develop Ashford as an international transport hub (and strengthen the case for the long-term sustainability of international rail services at this station). However, the quality (and traction) of this railway presents a significant barrier to this project.

We agree that there are also multiple issues with level crossings on strategic highways along the South Coast. The A259 between Hastings and Ashford (East Sussex/Kent) is particularly hazardous in places, as shown in Figure 2.29. There are several steep inclines, tight bends, and level crossings on this highway between Hastings and Ashford. These present significant safety risks for all users on this highway.

TfSE also name East Coastway Line - Faster Services as a scheme in our SIP (ref J6) which is supported by this strategy. We have cited the need for Increased line speeds on the East Coastway Line, to reduce journey times between Brighton, Lewes, Eastbourne and Hastings.

Are TfSE happy with the direction of the strategy?

TfSE has consistently highlighted the importance of enhancing rail connectivity along this corridor. This route is vital for regional economic growth, reducing social exclusion, and improving access to high-speed rail services. TfSE are happy with the direction the strategic study is taking and its alignment with TfSE’s Strategy and SIP. Our Vision is for the South East to offer the highest quality of life for all and be a global leader in achieving sustainable, net zero carbon growth. To achieve this, we will develop a resilient, reliable, and inclusive transport network that enables seamless journeys and empowers residents, businesses, and visitors to make sustainable choices.

Draft East Sussex Coast and Marshlink Strategic Study

Response from TfSE

TfSE is committed to supporting strategic interventions that align with our long-term transport vision and missions set out in our new Transport Strategy. The Study is aligned with our strategy Missions of:

- Strategic Connectivity
 - Realistic consideration of reduced journey times along this important coastal corridor.
 - Reduction/improvement of the road/rail interface
 - The inclusion of Rail Freight connectivity and provision for the study area.
- Resilience
 - Consideration of coastal erosion between Eastbourne and Bexhill
- Inclusion and Integration
 - Consideration of ease of interchange at various stations along the route
- Decarbonisation
 - Consideration of the impact on climate change on the study area
 - The inclusion of ways to increase modal share to the train including through ticketing and Mobility as a Service through the Plus Bus service
- Sustainable Growth
 - Direction to make service more attractive to non-rail passenger and bring new markets to rail
 - Consideration of the future infrastructure requirements for the study area

We have identified in our Strategic Investment Plan (SIP) as part of our High Speed Rail East package for Kent, Medway, and East Sussex, proposal T2 - High Speed 1 / Marsh Link - Hastings, Bexhill and Eastbourne Upgrade which identifies the need for new high speed services to Hastings, Bexhill and Eastbourne via High Speed 1 / the Marshlink Line to markedly reduce journey times between these locations and London.

While we acknowledge the current constraints around delivering high-speed services via the Marshlink Line, we welcome innovative approaches that could address these barriers over the long term which are set out in the report. TfSE are keen to continue collaboration with Network Rail and other partners to explore opportunities for accelerating the development and delivery of strategic solutions in this corridor, consistent with the objectives set out in our Strategic Investment Plan. The Strategy looks at the entire line and we support the approach of looking at the six listed options and the proposition of options to resolve them:

- Demand for additional trains
- Demand for faster journeys
- Improvements to interchange stations
- Aspirations for new and virtual stations
- Hampden Park level crossing issues
- Highspeed to Bexhill and Eastbourne.

TfSE are keen to engage further with Network Rail over the scheme/s and next steps as we refresh our SIP and draft our Rail Strategy for the TfSE area (both taking place this year). This provides us the opportunity to align our expectations and plans while supporting each other's priorities.

How would TfSE prioritise the investment in the Study Area?

TfSE supports the proposal of an incremental approach to delivery. Prioritisation of the easiest to deliver elements with greatest impact would be a sensible approach for early intervention. The approach should be mindful of current national funding constraints and the evolution of the planned rail reform and creation of Great British Railways. Local government reorganisation and devolution should also be a consideration as from May 2026 Sussex and Brighton will be a mayoral combined county authority and then Unitary Authorities will come into being from May 2027.

Alignment with the upcoming Integrated National Transport Strategy should be a consideration of the strategic study and its prioritisation. Continued alignment with the priorities outlined in our new Transport Strategy and the emerging TfSE Rail Strategy and SIP refresh would be precedent to TfSE and we are happy to collaborate as needed with Network rail to ensure we remain aligned. We would also state the importance of alignment with LTP's published by the relevant LTA's.

We would like to understand what can be delivered without majorly disrupting services while improvements are made and if changing scheduling can improve disruption. It would be disadvantageous to encourage modal shift away from rail through lengthy works and then encourage them back when complete.

How detailed should the strategic study be?

This would be dependent on the proposed audience and how the strategic study is planned to be used and what next steps get laid out as recommendations in the final study report. We would encourage you to tailor the report in the way the Gatwick study was done so that we (TfSE, KCC, East Sussex,) know what tangible action could be taken in partnership with Network Rail to support progress toward assessing the business case for the line speed improvements to facilitate further improvements in frequency. This could help

Draft East Sussex Coast and Marshlink Strategic Study Response from TfSE



us assess whether there is anything TfSE can do to support further progress of the scheme.

We would encourage caution and discretion over the elements of the study that can raise expectations through their resurrection when they have failed to materialise in the past. While we support the approach Network Rail are taking to improve services for passengers, the Willingdon chord and some of the new stations are examples of elements that were not included in our SIP after consultation with stakeholders. TfSE are happy to collaborate moving forward to maintain alignment of our plans with yours and manage expectations of stakeholders.

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Department for Transport Consultation “A Railway Fit for Britain's Future”

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 A Railway Fit for Britain's Future. This is a draft officer response that will be presented to our Partnership Board on 21 July 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. 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.

1.4 TfSE welcomes the opportunity to respond to this consultation which requests feedback on a number of questions in relation to the Government's proposals for the Railways Bill: the establishment and duties of Great British Railways (GBR), the introduction of a new passenger watchdog and the role of the new devolved mayoral and combined authorities in supporting the renationalisation railway.

2. Responses to consultation questions

Please see below TfSE's responses to each of the questions raised in the consultation document.

Question 1 –

Do you agree that GBR should be empowered to deliver through reformed incentives and a simplified and streamlined regulatory framework?

TfSE supports the establishment of GBR and the powers it will have to deliver a simplified and streamlined regulatory framework. However, it would be useful to understand more about the 'clear role' of the Secretary of State in appointing GBR's board members. Without this it is difficult to see how the statement at para. 1.18 that GBR as the “....directing mind at the heart of the railway” can be “separated from day-to-day influence by the government.....” can be substantiated. It is normal practice for board members of arms' length public

bodies to be appointed by ministers and overseen by the Commissioner of Public Appointments. If the Secretary of State is appointing the Board members, it is difficult to understand how GBR's separation from 'from day-to-day influence by the government' will be demonstrated to the public.

Question 2 –

Do you agree that the Secretary of State should be responsible for issuing and modifying a simplified GBR licence enforced by the ORR, and that the ORR's duties with respect to GBR should be streamlined to reflect the new sector model?

TfSE supports in principle the proposal for the Secretary of State to issue a modified licence which, as paragraph 1.22 states, is 'the guiding principle' and is 'specific and focused on a minimum viable set of conditions that are required for safety, performance (i.e. reliability and cancellations), efficiency, and passenger experience'.

However, while acknowledging there is no need for the number of conditions set out in the licences previously used for private bodies such as Railtrack, it omits specific references to at least other statutory responsibilities which TfSE believes should be included in the licence, as set out below.

- There is a need to include the specific GBR's statutory responsibilities to other users of the railway (e.g. freight and open access operators) whose exclusion may otherwise result in an undue focus on passengers at the expense of those other users.
- In addition, as 'the licence will be the only mechanism through which the ORR can take direct enforcement action against GBR' (paragraph 1.24), then this should clearly link the conditions on GBR not only to passengers but also to the Railway Bill's intention to create a statutory duty on GBR to promote rail freight. This intention is clearly set out in the Secretary of State's Foreword (page 6), at the bottom of page 9, and included as a proposed legislative measure "...that will form part of the Railways Bill giving us the tools we need to create and empower GBR...." on page 10.
- There is also a need for the railway to have consideration of their wider statutory responsibilities in relation to the government priorities of accessibility, the environment, social opportunity missions and economic growth as referred to at para. 3.12.

If these are not included, it is unlikely that GBR will be able to ensure that these specific duties are addressed.

Paragraph 1.22 also states that the licence contents will be 'subject to consultation as normal'. This should be extended to those who DfT recognise as having national and regional strategic transport planning functions, namely National Highways and Sub National Transport Bodies (STB). These bodies should be

named as consultees in relation to the new modified licence, as well as ORR, and the existing and new strategic authorities.

The legislation relating to the establishment and functions of STBs is set out in the Local Transport Act (2008), as amended. Under the Act, STBs are required to develop transport strategies for their areas and the Secretary of State must have due regard to these when determining national policies relating to transport and how such policies are to be implemented in relation to the area of the STB. By extension, therefore, the Secretary of State should also have regard to these strategies in determining the licencing conditions for GBR.

As recognised by the DfT, STBs are strategic transport planning bodies. The STBs' transport strategies and supporting daughter strategies, including those for rail and freight, and their strategic investment plans are based on firm evidence and analysis on a region-wide scale. These strategies and plans set out how investment in the transport system, including rail, will deliver economic growth, housing and net zero priorities through integrated and multimodal transport interventions. GBR's licencing conditions should therefore take account of these priorities which are aimed at delivering government priorities and those of the MSAs where these currently exist. A number of STBs cover areas that already include MSAs who are represented on their Boards. The White Paper on English Devolution published in December 2024, contains specific reference to the continued role of STBs in supporting Mayors and Combined Authorities at a regional level. Therefore, the STBs should be consulted when issuing guidance to the body that is responsible for the planning, management, operation and delivery of the rail network in the areas covered by STBs.

Question 3 –

Do you agree that the Secretary of State should be responsible for setting a long-term strategy for GBR to align with government priorities?

TfSE agrees that the Secretary of State should be responsible for setting the long-term strategy. However, the Secretary of State should be required to consult more widely when doing so, particularly with those that DfT recognise as having roles in national and regional strategic transport planning for road and rail planning, namely National Highways and STBs, in addition to the ORR, and the existing and new strategic authorities.

The STBs are the only strategic transport body that works across rail corridors and are able to represent MSAs and local transport authorities as well as the voices of local passengers through their elected local authority and MSA board members. If the STBs are not consulted, there is a risk that the devolved authorities, local transport authorities who are not part of the MSA 'city region' structure will be excluded.

It would also be useful to set a specific timeframe for the proposed Secretary of State's strategy. This is needed to enable both GBR as the network infrastructure

manager and its delivery partners e.g. rolling stock companies, equipment and building contractors and investors to establish clear investment pipelines. It would be preferable if the strategy covered at least a 25-year period. This would also facilitate the use of indicative funding allocations that would allow GBR and the MSAs to plan for passenger and freight improvements over a longer timescale which would also deliver better value for money to the taxpayer.

Question 4 –

What are your views on the proposed functions of the Passenger Watchdog?

TfSE welcomes with proposed functions of the Passenger Watchdog, particularly as it would act a 'one stop shop' with the function of monitoring passenger experience, championing improvements to service performance in passenger assistance, information, complaints and the upholding of consumer law currently carried out by the ORR.

However, this proposal also presents a good opportunity to extend the functions of a 'one stop shop' passenger watchdog through the inclusion of the functions of London Travel Watch, reducing the potential for passenger confusion about who to contact.

TfSE also welcomes the continuation of the multi-modal scope of the passenger watchdog to ensure that the performance of the whole passenger journey is covered 'door-to-door'. However, ferry passengers are not currently included, and it would be preferable to include this mode of transport too.

Question 5 –

Which of the approaches would best enable the establishment of the new passenger watchdog?

TfSE supports the establishment of the passenger watchdog as a statutory advisor with regulatory functions. However, the regulatory function should remain with ORR. This will ensure that the operators, appointed by GBR and therefore indirectly by the Secretary of State, are held to account by a distinct organisation and not one seen as responsible for the management of those same operators. If the ORR does not retain its regulatory function it will be difficult for the passenger watchdog to be seen as independent.

The establishment of the watchdog would still enable the setting of a common set of regulatory requirements and monitoring standards against which to measure the performance of GBR and its operators, whether within the public or private sector. Transparency and accountability would be improved if the ORR were to consult on the operators' performance with the devolved governments, MSAs and STBs.

This approach would still give the passenger watchdog a clear role 'to support the Secretary of State in delivering [the reformed railway]' and in advising both the

Secretary of State and GBR on decisions affecting how services are delivered to passengers. TfSE would welcome some further clarity on the relative priority that the Secretary of State would give to the watchdog's advice when set against other statutory consultees' advice, such as that received from those involved in the planning and delivery of rail services to passengers. To ensure fairness and equity, it should be made clear that for the purposes of rail planning and performance, each consultees' advice will carry equal weight.

Question 6 –

Which of the options to establish the Alternative Dispute Resolution function as part of the passenger watchdog would deliver the best outcome for passengers in your view?

TfSE supports the alternative dispute resolution function currently held by the Rail Ombudsman (RO). As the consultation document explains, this is likely to be the simplest option with the least disruption to the RO or the passenger experience. More importantly, it ensures the independence of the dispute resolution body, as it distinguishes the Ombudsman's decision from a body with a recognisable association with government.

Question 7 –

Does the proposed new access framework enable GBR to be an effective directing mind that can ensure best use of network capacity?

TfSE supports the principle behind the new, simpler access framework that will provide a clearer understanding of the framework to the other users of the railway e.g. open access and freight users.

The consultation document states that GBR's access and use functions will be governed by its duties to deliver whole system benefits, government priorities, and the goals of devolved governments and MSAs. However, it omits reference to the strategic and regional priorities set out in the STB strategies and investment plans, particularly those that specifically relate to rail.

These strategies and plans already address how all forms of transport, including rail, will deliver economic growth, housing and net zero priorities through integrated and multimodal transport plans for each of our regions. Given that the rail network extends beyond the boundaries of MSAs into the surrounding region, it is important that GBR also takes into account the evidence provided by STBs in addition to those from devolved governments and the MSAs.

Like the licence requirements, it is important that the priorities of rail passengers outside of the areas covered by the devolved administrations and MSAs, as well as those who are part of the less well-resourced devolved authorities, are reflected in the access and use functions of GBR, as well as its duties to deliver whole system benefits and government priorities. STBs are the only bodies recognised by the DfT as national strategic planning authorities who can represent, the priorities of

local communities that are not part of the devolved government authorities and those whose devolved government is not well-resourced.

Therefore, the goals and priorities as set out by the STBs' strategies and strategic investment plans must be included as part of "the whole system benefits, government priorities, and the goals of devolved governments...." that govern the access and use functions of GBR.

For these reasons, it is also important to include STBs in the consultation process, particularly for those regulations in which STBs have an interest in GBR's access use policy, including:

- International Paths
- Access to GBR facilities, especially timetabling decisions
- Publication of Information
- Performance and compensation regime
- Railway Performance Data

Paras. 3.19 and 3.20 state that "GBR will set policy and standard contracts transparently and in consultation. GBR will be required to consult (and have regard to consultee responses) on how it fulfils its duties for access to and use of the network. This will include setting out timescales, information requirements, and decision-making criteria - making it clear how other parties are involved and consulted on decisions. This will be achieved through the development of GBR's Access and Use Policy (AUP)....", in line with para. 3.20 "The development of GBR's AUP will be an important mechanism for operators, transport bodies and other railway undertakings. It should transparently outline how GBR will collaborate with all parties, including devolved leaders, to deliver social and economic benefits."

If STBs are not included in the consultation on these policies and contracts, it is not clear how GBR can purport to take into account the needs of those passengers and freight users who are not represented by those devolved leaders as set out above and demonstrate that their priorities as set out in the STB strategies and plans will be delivered.

Question 8 –

What - if any - key access rules and requirements for GBR should be updated and included in legislation?

As TfSE is not an operator on the railway network it has no specific comments in relation to the access management framework proposals as set out in the consultation document.

However, as a proposed statutory consultee in relation to setting the strategic priorities and operational planning of the rail network, it supports the inclusion of the following regulations in the access use policy to be set out by GBR:

- International Paths: Requirements for GBR to accommodate international paths in line with international obligations.
- Access to GBR facilities: Obligations to offer access to GBR facilities (stations, depots, etc.) when granting access, with fair charges.
- Obligations to publish information to ensure fairness and non-discrimination, and information for prospective applicants for access and railway undertakings to support capacity allocation and other processes covered in the Railways Act 1993.
- Performance and compensation regime: Requirements on GBR to develop and offer a performance regime to non-GBR operators on its network. The regime should include provision for reasonable penalties and compensation.
- Railway Performance Data: Recognising the need to protect commercial information, GBR should be required to collect and assess railway performance data with operators on the network. It should develop methodologies and schemes with operators to inform improvement actions.
- Collaboration with other infrastructure managers and facilities operators: Requirements on GBR to collaborate and cooperate with other infrastructure managers, and for GBR and the ORR to align on duties for access and charging.
- Standard Contract Terms and policies: Requirements to publish and consult on standard contract terms and policies that cover GBR's access and use functions.

Question 9 –

Does the proposed role of the ORR acting as an appeals body to ensure fairness and non-discrimination provide sufficient reassurances to operators such as freight and open access wishing to access the GBR-managed network?

No response.

Question 10 –

Do you foresee any unintended consequences of the ORR retaining its existing powers with regard to other infrastructure managers which might affect the smooth passage of trains between the GBR and non-GBR network?

No response.

Question 11 –

The government intends to include in primary legislation a power to enable amendments to the Railways (Access, Management and Licensing of Railway Undertakings) Regulations 2016 to ensure consistency between GBR's processes and those used by other infrastructure managers. Do you agree with this approach?

No response.

Question 12 –

Do you agree with the proposed legislative approach regarding a 5-year funding settlement for Great British Railways?

It is TfSE's view that provision should be made for longer-term indicative funding allocations beyond the 5-year funding settlement period as part of these legislative changes. The 5-year funding settlement should be part of a longer-term funding pipeline aligned with the long-term, rail strategy developed by the Secretary of State. This would enable both GBR as the network infrastructure and operations manager and its delivery partners e.g. rolling stock companies, equipment and building contractors and investors to establish longer term investment plans. These would not only stimulate economic growth in the rail industry and professional trade sector and would also allow those responsible for planning rail improvements at national, regional and local levels to plan for passenger and freight improvements on a more effective and efficient basis..

TfSE would also encourage the government to broaden its consultation in relation to the development, assessment and monitoring of the effectiveness of GBR's business plan. Paragraph 4.5 states that "Core settlements will last 5 years, and the ORR will retain a role in assessing business plans and settlement viability." The statutory consultees involved in setting the Secretary of State's strategy for the railway and whose priorities and goals are those by which GBR's access and use functions will be governed should also be consulted, including, STBs. Collectively, we and the devolved governments and MSAs are the only bodies who could assess and monitor the effectiveness of GBR's business plan, in delivering our own goals and priorities, as set out in our respective strategies and plans.

If national rail planning is going to reflect the Secretary of State's five priorities, particularly that of "transforming infrastructure to work for the whole country, promoting social mobility and tackling regional inequality", then omitting those bodies representing the passengers from the opportunity to assess the appropriateness of the network and operating management's business plan would be an oversight.

Question 13 –

Do you agree with the legislative approach set out above to retain the Secretary of State's role in securing the overall affordability of fares and continuing to safeguard certain railcard discount schemes?

While TfSE supports the general approach for securing the overall affordability of rail fares, there should be clear guidance in relation to how the fares and discounts managed by GBR and the open access and devolved operators are integrated. This will ensure that there is no significant difference or discrimination between different UK regions or groups of passengers, particularly in relation to journey affordability and accessibility.

The Secretary of State should already be mindful of the priorities set out by STBs in relation to accessibility and affordability, but GBR and open access operators should have to consult with STBs to ensure that their discount schemes and fares policy address the priorities of the STBs. The Partnership arrangements already in place between GBR and STBs would be able to accommodate this function.

Question 14 –

What, if any, safeguards are needed to ensure a thriving and competitive rail retail market while also ensuring GBR can deliver a high-quality offer to its customers?

TfSE recommends that local or regional transport integrated, multimodal and/or other ticketing initiatives and apps, such as an extension to Solent Go and the Bee Network ticketing model, are included in those ticketing options that GBR should support. These should be included in addition to those currently supported by private or open access operators and will support the implementation of the National Integrated Transport Strategy.

Question 15 –

The government intends that GBR's statutory duty in relation to devolved leaders should strike a balance between enhancing their role whilst also ensuring that GBR has the appropriate flexibility to direct the national network. Do you agree with this approach?

TfSE supports the broad approach to the balance between the management of the national rail network “...to better deliver for passengers, taxpayers, and freight customers, and to unlock growth” (para. 6.3) while ensuring that the devolved leaders have the opportunity to “...integrate local railways with other transport modes...[and] create unified transport networks that serve their cities and regions.....” (para. 6.3).

However, as stated in the response to Questions 3 and 7, the approach to the involvement of other tiers of local government in England is inadequate. It is not enough to let GBR engage with other strategic transport planning bodies outside

the legislation. This runs the risk of exclusion of those bodies that produce regional strategies and strategic plans to which the Secretary of State must have due regard. GBR should be consulting with STBs in the same way as it will do with other devolved leaders set out in para. 6.7 rather than just “working with STBs....on matters of wider regional interest.” (para. 6.4).

The strategic nature of rail planning, and also of the freight and logistics industry, means that the region wide perspective provided by the STBs’ strategies and plans is vital to enable GBR to deliver better outcomes for its passengers and freight customers across that region, the taxpayer and to unlock growth in their areas.

The STBs are the only regional strategic transport planning body representing the voices of local and region-wide passengers through their elected local authority and likely MSA board members. STBs already have established productive links with the freight and logistics industry through their freight forums.

STBs are also already in established partnerships with GBR. For example, the Wider South East Rail Partnership includes TfSE, England’s Economic Heartland, Transport East, Network Rail and TfL. This Partnership enables us to discuss and agree wider strategic and delivery priorities and plans for a recognised economic region as a whole as well as “engagement on strategic priorities, close collaboration on the delivery of rail elements of Local Transport Plans.....” (para. 6.23). The Wider South East Rail Partnership:

- provides a framework for bringing together strategic partners at the right scale to co-ordinate investment and policy priorities across this significant part of England’s rail network.
- works with all partners to provide a coherent single voice to government and GBR on investment, policy and systems approaches required to enable the wider south east rail network, including London to work as an integrated network.
- enables STBs, existing and future strategic authorities, Transport for London, the Department for Transport, and the rail industry to plan an integrated rail network in the south east and
- presents a ‘ready-made’ framework to lead the strategic debate and coordinate planning for rail across the South East of England, for all strategic planning authorities, including the new MSAs.

This Partnership is also particularly important in relation to the main operator, GTR in the Wider South East Region. It is not only one of the biggest operators in England, carrying one in five passengers, but its network geography closely matches that of the Partnership. It is difficult to see how smaller GBR partnerships based on the MSAs in the region would be able to have sufficient

oversight of the priorities and planning requirements delivered by this operator across the region.

This Partnership already “...enable[s] GBR to have bespoke relationships with devolved leaders based on the needs of the local community to deliver the best results for passengers and freight users” (para. 6.6). It also allows the STBs and MSAs a “....statutory role [to be] appropriately consulted [about] GBR’s activity (including the development of railway plans, strategies, and services), [and] are able to scrutinise GBR’s performance, and that GBR has due regard to devolved transport strategies.” (para. 6.7)

If the STBs are excluded from this level of consultation, there is a risk that the impacts of GBR’s planned interventions will not benefit from “....drawing on.....experiences and expertise” of the STBs and their local and regional communities in the same way as that expected of the devolved authorities, (para. 6.3). There is also the risk that the oversight of the operator will be divided between numerous MSA partnerships with differing priorities. In addition, there is the risk that the priorities of the freight and logistics industry will go unheard as they are not represented in the new devolved local government structures., However, they are very much part of the STBs partnerships.

Question 16 –

Do you agree with the proposed approach in Scotland on enabling further collaboration between track and train while preserving the devolved settlements?

No response.

Question 17 –

Do you agree with the proposed approach in Wales on enabling further collaboration between track and train while preserving the devolved settlements?

While TfSE has no comments on the way that the mechanics of the proposed joint working arrangements between GBR and Transport for Wales will operate, there should be a mechanism by which Transport for Wales and GBR should have due regard to and take into account the effects of any proposed interventions on the surrounding rail networks which are part of other regional strategies and plans.

Question 18 –

Do you agree with the government’s approach of making targeted amendments to existing legislation to clarify the role of devolved leaders in relation to GBR?

TfSE agrees that the most appropriate way forward for the government is to make targeted amendments via secondary legislations to enable a “‘right to request’.

This will provide a new and transparent process for the Secretary of State to make decisions on further devolution where Established Mayoral Strategic Authorities believe they could more effectively run rail services and/or assets.” The planning, management and operation of the railway requires strategic oversight, There must be clear and well-defined evidence presented to government that where MSAs and potentially others wish to run railway services they do so in a way that will not have detrimental effects on the services and communities served by the adjoining parts of the rail network.

As stated in the response to Question 15, it will be expected that STBs, as recognised regional strategic transport planning bodies, will be consulted in relation to any such request made by MSAs or other more locally devolved local government bodies to ensure these potential impacts are taken into account for wider regions and not just those areas covered by MSAs.

Question 19 –

The government intends to create a new delegated power that would enable the Secretary of State to update, amend or revoke provisions in TDLCR [*Train Driving Licences and Certificates Regulations (TDLCR) 2010 (as amended)*] and related assimilated law in Great Britain, subject to public consultation. Do you agree with this approach?

No response.

Question 20 –

Please provide evidence on anticipated transitional or ongoing costs or benefits for you or your business resulting from these proposals. For example, please provide evidence on the scale of transitional costs associated with familiarising with the new proposals and structure, changes to administrative burden resulting from these proposals, or any other direct impacts associated with the proposed changes.

There will be no transitional or ongoing costs or financial benefits to TfSE as a business.

3. Summary

TfSE broadly supports the Government’s proposals for the Railways Bill, establishment of GBR and the creation of a new passenger watchdog. However, we believe that there is the need for further clarification in places and are also some significant omissions.

- GBR should be able to demonstrate clearly it is an arm’s length government body through the use of the Commissioner of Public Appointments in appointing its board members without the influence of the Secretary of State.

- GBR's licence should reflect its statutory duty to promote rail freight so that it can be held to account by its planning, investment and rail freight stakeholders and the ORR.
- Its licence should reflect better the wider statutory responsibilities of the government priorities of in relation of accessibility, the environment, social opportunity missions and economic growth.
- The Secretary of State's long-term strategy should have a specific timeframe, for example 25 years. This would enable the government, GBR as the network infrastructure manager and its delivery partners e.g. rolling stock companies, equipment and building contractors, devolved and regional authorities and investors to establish clear planning, funding and investment pipelines.
- TfSE supports the establishment of the passenger watchdog and its multimodal approach but would suggest that the opportunity is taken to include London TravelWatch within its remit to ensure that there is only one clear 'watchdog' for all users. TfSE would also prefer the line of separation is kept between the 'watchdog' and an alternative dispute resolution function and therefore supports the retention of the Rail Ombudsman.
- TfSE supports the general approach for securing the overall affordability of rail fares, but there should be clear guidance in relation to how the fares and discounts managed by GBR and the open access and devolved operators are integrated to ensure that there is no significant difference or discrimination between different UK regions or groups of passengers.
- TfSE recommends that local or regional transport integrated, multimodal and/or other ticketing initiatives and apps, such as an extension to Solent Go and the Bee Network ticketing model, are included in those ticketing options that GBR supports. These will play a key role in supporting the implementation of the National Integrated Transport Strategy.
- TfSE supports the broad approach to the balancing the management of the national rail network and ensuring that the devolved leaders are consulted widely about the management of the network in their areas. However, as highlighted throughout our submission, it is a serious omission not to include the STBs in the statutory duties to consult and decision-making processes of GBR and/or ORR. It is not enough to let GBR simply 'engage' with other strategic transport planning bodies outside of the legislation. This runs the risk of exclusion of those bodies that produce regional strategies and strategic plans to which the Secretary of State must have due regard such as those of the STBs. The STBs are the only regional strategic transport planning body

which works across rail corridors and represents the voices of local and region-wide passengers through their elected local authority and likely MSA board members. STBs also have established productive links with the freight and logistics industry through their freight forums.

- The STBs already have established partnerships through which the STBs, GBRTT, NR and the DfT are already engaging. For example, the Wider South East Rail Partnership includes the STBs and devolved authorities of TfSE, England's Economic Heartland, Transport East and TfL. In due course it will also include the MSAs in the region. This Partnership is already set up to "...enable[s] GBR to have bespoke relationships with devolved leaders based on the needs of the local community to deliver the best results for passengers and freight users" (para. 6.6). It will also allow the STBs and MSAs a "...statutory role [to be] appropriately consulted [about] GBR's activity (including the development of railway plans, strategies, and services), [and] are able to scrutinise GBR's performance, and that GBR has due regard to devolved transport strategies." (para. 6.7)
- The Wider South East Rail Partnership is also important in relation to the main operator, GTR in the Wider South East Region. It is not only one of the biggest operators in England, carrying one in five passengers, but its network geography closely matches that of the Partnership. It is difficult to see how smaller GBR partnerships based on the MSAs in the region would be able to have sufficient oversight of the priorities and planning requirements delivered by this operator across the region.
- If the STBs are excluded from this level of consultation, there is a risk that the impacts of GBR's planned interventions will not benefit from "...[the] experiences and expertise" of the STBs and their local and regional communities in the same way as that expected of the devolved authorities (para. 6.3). There is also the risk that the oversight of the region's main operator will be divided between numerous MSA partnerships with differing priorities.
- TfSE agrees that the "right to request" through secondary legislation will provide a new and transparent process for the Secretary of State to make decisions on further rail devolution to established MSA. However, the planning, management and operation of the railway requires strategic oversight. There must be clear and well-defined evidence presented to government to ensure that where MSAs and potentially others wish to run railway services they do so in a way that will not have detrimental effects on the services and communities served by the adjoining parts of the rail network. As a result, it will be expected that STBs, as recognised regional strategic transport planning bodies, will be consulted in relation to any such request to ensure these potential impacts are taken into account for wider regions and not just those areas covered by MSAs.

09 June 2025

**Transport for the South East's Response to the CIHT Call for Evidence:
Challenges in Rolling Out Electric Vehicle (EV) Charging Infrastructure.**

This is Transport for the South East's (TfSE) draft response to the CIHT's Call for Evidence: Challenges in Rolling Out Electric Vehicle (EV) Charging Infrastructure. This call for evidence is part of a wider research project aimed at understanding the issues and challenges associated with rolling out EV charging infrastructure across the UK. 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.

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 recently completed a 'state of the region' report that aims to establish the progress being made with the rollout of EV charging infrastructure across the TfSE area. The study included engagement with local transport authorities to identify the key issues and challenges being faced with the rollout of future EV charging infrastructure across the region. The results of this engagement have fed into our response to the CIHT's Call for Evidence.

In addition to the table below, one specific topic that TfSE would like to highlight as part of this response is the need for more consideration being given to the needs and requirements of commercial fleet vehicles as part of the rollout of publicly available charging infrastructure. TfSE has recently completed a study which aimed to understand the impacts of commercial fleet vehicles on a future publicly available charging infrastructure network.

This work highlighted that whilst passenger cars have been making steady progress in the transition to electric vehicles, the progress amongst light and heavy duty commercial vehicles and fleets has been much slower. Although commercial vehicles comprise only around 15% of the total vehicle fleet on UK roads, they make up 26% of the miles driven and 42% of greenhouse gas emissions. As a consequence, when the total fleet is fully electrified, it is anticipated commercial vehicles will consume half of the total electricity demand from all types of electric vehicles. Further information on this study can be found [here](#).

Call for Evidence: Challenges in Rolling Out Electric Vehicle (EV) Charging Infrastructure

We are seeking evidence from stakeholders involved in the planning, funding, deployment, or use of EV charging infrastructure. This call for evidence is part of a wider research project aimed at understanding the **issues and challenges associated with rolling out EV charging infrastructure** across the UK. The report aims to be a one stop information point for those rolling out EV charging infrastructure

Please consider the following themes and questions to guide your response (*you do not have to answer all questions; they are a guide*)

Organisation	Transport for the South East
Name	Benn White
Email address	benn.white@transportforthesoutheast.org.uk
Location where EV charging infrastructure was installed/ attempted to be installed (if applicable)	N/A

	General issues or challenges to consider	On- street specific considerations or challenges	Off- street specific considerations or challenges
Funding	<ul style="list-style-type: none"> - Delays experienced in receiving funding from government due to election periods and funding cycles. - Securing LEVI funding involves multiple governance groups and a lengthy procurement route. - LEVI process is holding local transport authorities back from delivering more commercially viable chargers. - LEVI requirements are challenging due to scope changes. Lack of clarity from LEVI support body impacts the Council's ability to submit ITT documents for approval. - Securing public sector subsidies is difficult due to budget constraints and political priorities. - The capability fund of the LEVI pot has been helpful but does not stretch far enough in some cases. - Lack of transparency and coordination over publication of LEVI tenders. - Slow approval timescales of LEVI applications, in some cases applications are overengineered which delays the process. - LEVI requirements are challenging due to scope changes. 		

Commercial Models and Procurement	<ul style="list-style-type: none"> - Councils often lack resources (time/skill/experience) to run procurement exercises. - CPOs are saturated with Requests for Proposals, meaning they can select their preferred LA. Smaller LAs are finding they need to make their tenders less beneficial to the authority to attract bidders, there is concern that they will not be able to run successful LEVI tenders. - Conflicts experienced between the non-negotiable terms of LEVI and the ability of third-party CPOs to fund or operate charge points on the network. - Questions from the CPOs around return on investment in case of early termination of infrastructure of the infrastructure (CPOs don't like break clauses) 		
Planning applications and licences	<ul style="list-style-type: none"> - Changing direction (i.e. Section 50 and 155 of the Highways Act) and delayed guidance from support bodies (i.e. DfT, ORCs) and government, especially on heads of terms and approval process. 		
EV charging bay Location			
EV charging bay network design			

EV charging infrastructure location	<ul style="list-style-type: none"> - High density housing areas have parking constraints that makes putting in EV bays difficult, especially ahead of demand. 		<ul style="list-style-type: none"> - Those living in leasehold accommodation with off-street parking face issues getting landlord permission for EVI installation.
EV charging infrastructure design	<ul style="list-style-type: none"> - Poor accessibility of EV bays. 	<ul style="list-style-type: none"> - Lamp columns have a finite life, which can result in abortive work on lamp column chargers if the lamps need replacing. 	
Public consultation		<ul style="list-style-type: none"> - The need to run appropriate level of public consultation for on-street bays before projects are agreed to avoid backlash and manage expectations of residents. 	
Traffic Order considerations (if applicable)			
Power Requirements and Grid Upgrades	<ul style="list-style-type: none"> - Significant DNO delays e. g. grid connections 		

Customer Accessibility		<ul style="list-style-type: none"> - Liability and safety concerns with cross-pavement solutions, particularly for disabled users. 	
Physical implementation of charging point issues or challenges			
Post implementation issues or challenges			
Private charging, i.e. where vehicle is parked on-street but charging point is privately owned			
Use of EV Charging Apps			
Any other issues or challenges to consider	<ul style="list-style-type: none"> - Generally, LAs have a shortfall in staff (e.g. / GIS / Procurement and Legal) and expertise in EV/EVIs. - Challenges with rollout due to lack of project dedicated resources for the LTA, DNO and CPO. 		

General comments	<ul style="list-style-type: none"> - More consideration needs to be given to accessibility for larger commercial vehicles (vans/HGVs) when installing EVCI. TfSE's recent fleet vehicle forecasting work suggests there will be almost a 50/50 split on energy demand in the year 2050 between private vehicles and commercial vehicles on a publicly available charging network. 		
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Organisation	Name of document (if applicable)	Website link
TfSE	TfSE EVCI Fleet Forecast Methodology	Link

We will also be compiling a list of useful documents and websites for anyone considering rolling out EV charging infrastructure and would be grateful for any you can recommend.

Submitting Your Evidence

Please submit responses by filling in the tables above and return this document via email by **Friday 13th June 2025**.

Email submissions to: technical@ciht.org.uk

For any questions please feel free to contact sara.zuin@ciht.org.uk

James Harris
Assistant Director
Economy, Transport and Environment Department
East Sussex County Council
County Hall
Lewes
BN7 1UE

25 June 2025

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

Kate Over
Transport Strategy Manager
Transport for the South East.