Agenda Item 8

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

Date of meeting: **2 February 2026**

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

Title of report: **Responses to Consultations**

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

RECOMMENDATIONS:

The Members of the Partnership Board are recommended to:

1) **Agree the draft response to Brighton & Hove City Council's Consultation - Our City Transport Plan 2035**

2) **Agree the draft response to National Energy System Operator's Consultation on the transitional Regional Energy Strategic Plan (tRESP)**

3) **Agree the draft response to National Energy Systems Operator's Consultation on the methodology for the Regional Energy Strategic Plan (RESP)**

4) **Agree the draft response to Department for Transport's Consultation on the third Cycling and Walking Investment Strategy (CWIS3)**

5) **Agree the draft response to the consultation on proposals for local government reorganisation in East Sussex, Brighton & Hove, and West Sussex**

6) **Agree the draft response to the consultation on proposals for local government reorganisation in Hampshire, Isle of Wight, Portsmouth and Southampton**

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:

- Brighton & Hove City Council's (BHCC) Consultation - Our City Transport Plan 2035
- National Energy System Operator's (NESO) Consultation on the transitional Regional Energy Strategic Plan (tRESP)
- NESO's Consultation on the methodology for the Regional Energy Strategic Plan (RESP

- Department for Transport's (DfT) Consultation on the third Cycling and Walking Investment Strategy (CWIS3)

2. Brighton & Hove City Council's Consultation - Our City Transport Plan 2035

2.1   In September 2025, TfSE responded to BHCC's consultation - Our City Transport Plan 2035. This response is contained in **Appendix 1**.

2.2   The response noted the draft 'Our City Transport Plan 2035' demonstrates a strong alignment with TfSE's Transport Strategy, notably through its recognition of the role of the Transport Strategy and Strategic Investment Plan.

2.3   The response noted opportunity to incorporate explicit references to several regionally significant schemes beyond city boundaries, suggesting this would further anchor Brighton & Hove's proposals within the regional investment framework.

3. NESO's Consultation on the transitional Regional Energy Strategic Plan (tRESP)

3.1   NESO opened their consultation on tRESP in Autumn 2025 seeking TfSE's comment as key stakeholders. The tRESP is the first publication in the journey towards transforming and improving local energy infrastructure. TfSE submitted a response in November 2025 which is contained in **Appendix 2.**

3.2   The response was broadly supportive of the tRESP, alongside several key suggestions about how the transport activity and infrastructure in the South East could be better considered alongside energy infrastructure.

3.3   The response outlined that the South East's distinct patterns of transport activity generate an electricity demand that differ from other regions. Greater emphasis on these transport–energy linkages, and clearer spatial representation of cross-boundary movements to and from London, would make the context more accurate and actionable.

3.4   The response gave detailed answers on how the mapping in tRESP could be revised to improve its viability for direct use in transport or spatial planning.

4. National Energy Systems Operator – Consultation on the methodology for the Regional Energy Strategic plan

4.1   NESO's RESP Methodology sets out the proposed approach to implementing the RESP role. NESO opened consulting on the RESP Methodology in November 2025, closing January 2026.

4.2   The response was broadly support of the RESP methodology, noting provides a strong platform for developing place-based, whole-system RESPs. TfSE stands ready to support delivery by convening stakeholders, curating local area intelligence, validating drafts and supporting ongoing monitoring.

4.3   TfSE offered constructive suggestions on a number of improvements across the particulars of the consultation. Most significantly, TfSE would welcome deeper transport–energy integration (freight, ports, airports and cross-boundary corridors) and open, map-based data outputs at useful geographies to help operationalise RESP in ED3 and local energy planning contexts.

5.   Department for Transport's (DfT) Consultation on the third Cycling and Walking Investment Strategy (CWIS3)

5.1   The Department for Transport opened a Consultation on CWIS3. TfSE have submitted a response, which is contained in **Appendix 4**.

5.2   The response strongly supports the overall direction of CWIS3 and welcomes its alignment with our Transport Strategy, particularly the missions on Decarbonisation, Inclusion & Integration, Strategic Connectivity, and Sustainable Growth.

5.3   The response noted local performance indicators need to be practical and robust. It recommends moving away from monitoring percentage increases in trip stages at LTA level, and instead using alternative measures such as school travel mode shares and cordon counts on LCWIP corridors.

5.4   The response suggests ATE could provide a clear Monitoring Playbook with standard methods, open dashboards, and co-funding for counters to help LTAs deliver consistent, high-quality data without excessive burden.

5.5   The response highlights an extant general data gap in travel behaviour, which could be met through collecting local level travel survey data, on a more continuous basis is challenging. This could be delivered at a regional/STB level to balance the level of detail needed and achieve economies of scale.

5.6   Finally, the response proposes capital investment must be matched with revenue funding. Behaviour change programmes like Bikeability, adult cycle confidence, and school streets are essential to convert infrastructure into real uptake.

6.   Consultation on proposals for local government reorganisation in East Sussex, Brighton & Hove, and West Sussex

6.1   East Sussex County Council, Brighton & Hove City Council, and West Sussex County Council collectively opened a consultation on their proposals for local government reorganisation. TfSE have submitted a response, which is contained in **Appendix 5.**

6.2   The response notes TfSE does not take a position on specific options for local government reorganisation – this is for government and our local authority partners to determine.

6.3   The response assures TfSE will remain a constructive partner to all our local authorities, whilst being adaptable to final governance arrangements.

6.4   The response concludes that TfSE remain committed to supporting authorities and government to ensure that transport planning and investment contribute positively to sustainable growth, improved connectivity, and better outcomes for communities across Sussex and Brighton and the rest of our region.

7.   Consultation on proposals for local government reorganisation in Hampshire, Isle of Wight, Portsmouth and Southampton

7.1   Hampshire County Council, Isle of Wight Council, Portsmouth City Council, and Southampton City Council collectively opened a consultation on their proposals for local government reorganisation. TfSE have submitted a response, which is contained in **Appendix 6**.

7.2   The response notes TfSE does not take a position on specific options for local government reorganisation – this is for government and our local authority partners to determine.

7.3   The response assures TfSE will remain a constructive partner to all our local authorities, whilst being adaptable to final governance arrangements.

7.4   The response concludes that TfSE remain committed to supporting authorities and government to ensure that transport planning and investment contribute positively to sustainable growth, improved connectivity, and better outcomes for communities across Hampshire and the Solent, and the rest of our region.

8.   Conclusions and recommendations
8.1   The Members of the Partnership Board are recommended to agree the draft responses to the consultations detailed in this report.

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Draft 'Our City Transport Plan 2035' - Brighton & Hove City Council Consultation response from Transport for the South East

1. Introduction

1.1.   This document is the draft Transport for the South East (TfSE) response to the consultation on the Brighton & Hove City Council's draft 'Our City Transport Plan 2035'. This is a draft officer response that will be presented to our Partnership Board in January 2025 for approval. A further iteration may therefore follow.

1.2.   TfSE is the 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, National Highways, 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. Our Strategic Investment Plan (SIP) provides the delivery framework for this strategy, setting out the infrastructure and policy interventions needed across the region over the next three decades. This is in the process of being refreshed.

1.4.   TfSE welcomes the opportunity to respond to the consultation on the draft 'Our City Transport Plan 2035'. We trust that our response will add value to the development of the City Council's plan and form the basis for continued engagement as we strengthen the 'golden thread' between the local and regional strategies.

2. Approach

2.1.   The draft 'Our City Transport Plan 2035' is structured around six objectives and a set of guiding principles reflecting active and healthy travel, efficient road networks, the transition to zero-emission vehicles, inclusive access, and well-maintained streets. This approach is closely aligned with the principles underpinning TfSE's Transport Strategy. Both emphasise evidence-based prioritisation, integration of transport with wider policy areas, and the need to balance economic, social and environmental outcomes in decision-making.

2.2.   There are several common elements in the way the two documents have been developed. Each draws on the 'avoid–shift–improve' framework, promotes a 'Movement and Place' approach that balances the movement of people and goods with the role of streets as public spaces and incorporates aspects of 'Triple Access Planning' which integrates physical mobility, digital connectivity and spatial proximity in access planning. Both documents also support data-led monitoring to inform investment decisions.

3. Vision

3.1.   The vision in the Brighton & Hove draft LTP5 is strongly aligned with the 2050 Vision in TfSE's Transport Strategy. Both commit to a low-carbon, inclusive and accessible transport system that enhances quality of life and supports sustainable economic growth. The shared emphasis on reducing emissions, improving connectivity, and creating healthier places provides a robust foundation for partnership working. Table 1 below sets out the alignment between the two vision statements.

Table 1: Alignment between the 'Our City Transport Plan 2025' and the 2050 vision in TfSE's Draft Transport Strategy

'Our City Transport Plan 2035' Vision	TfSE Transport Strategy 2050 Vision
A transport system that enables everyone to move around and access what they need easily, affordably and safely, while improving health and wellbeing, reducing carbon emissions, and enhancing the city's environment and economy.	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. We will develop a resilient, reliable and inclusive transport network that enables seamless journeys and empowers residents, businesses and visitors to make sustainable choices.

4. Alignment between Brighton & Hove Objectives and TfSE's Missions

4.1.   Table 2 presents an assessment of alignment between the objectives of the 'Our City Transport Plan 2035' and the five missions of TfSE's Transport Strategy. The analysis shows strong overall alignment, particularly in relation to decarbonisation, inclusion, and sustainable growth.

Table 2: Alignment between objectives of 'Our Transport Plan 2025' and TfSE's five Missions

Brighton & Hove 'Our Transport Plan 2035' objectives	TfSE's Missions				
	Strategic Connectivity	Resilience	Decarbonisation	Inclusion & Integration	Sustainable Growth
1. Increase the use of public transport and active travel.	X		X	X	X
2. Support the transition to zero-emission vehicles.			X		
3. Ensure safe, inclusive and affordable transport options for all.			X	X	
4. Maintain streets and public spaces to high standards.		X			X
5. Integrate transport with new housing, jobs and regeneration.	X			X	X
6. Harness technology and data to improve travel and reduce emissions.	X		X		X

4.2   As shown in Table 2, the objectives of 'Our Transport Plan 2035' are broadly consistent with TfSE's missions. Notably, the emphasis on mode shift and zero-emission vehicles supports TfSE's Decarbonisation Mission, while the focus on inclusion and accessibility aligns with the Inclusion & Integration Mission. The Council's approach to technology, data and public realm improvements complements TfSE's Resilience and Sustainable Growth missions.

4.3   TfSE welcomes the clear recognition in 'Our City Transport Plan 2035' of the regional role played by Transport for the South East and the inclusion of both the TfSE Transport Strategy and the Strategic Investment Plan (SIP) to demonstrate alignment with regional priorities. The Plan usefully reproduces the TfSE Strategic Investment Plan map, illustrating the alignment between Brighton & Hove's local priorities and the wider regional network. It also identifies several shared priority schemes, including the Sussex Coast Mass Rapid Transit (MRT) concept, Brighton Main Line resilience and capacity improvements, A27 and A23 corridor enhancements, and the strategic mobility hubs proposed at Falmer, Shoreham, and the A23/A27 junction.

4.4   There is scope to strengthen the alignment between the two documents by referring to a small number of additional schemes from the Strategic Investment Plan that are directly relevant to the city's wider connectivity. These include the A27 East of Lewes to Polegate improvements, which would enhance east–west resilience and improve access between Brighton and Hove, Eastbourne and the wider coastal area; and the West Coastway Strategic Study, which aims to reduce rail journey times between Brighton, Lewes, Eastbourne and Hastings. Reference could also be made to the proposed additional platform at Brighton Station, which will increase capacity and improve the reliability of services to and from the station and the reinstatement of direct Cross Country services between Brighton, London and the Midlands to reduce journey times for long-distance travelers and support inbound tourism. Finally, reference to TfSE's electric vehicle charging infrastructure and wider decarbonisation work areas, in which the City Council has already been involved, would further demonstrate consistency with regional initiatives to reduce emissions.

4.5   Recognising these additional linkages would give a more complete picture of how Brighton and Hove's proposals fit within the wider regional investment framework and would help strengthen the case for future joint funding and delivery.

5. Conclusion

5.1   The draft 'Our City Transport Plan 2035' demonstrates a strong alignment with TfSE's Transport Strategy, notably through its recognition of the role of the Transport Strategy and Strategic Investment Plan. TfSE welcomes this clear acknowledgement of the regional context and the City Council's commitment to collaboration on future investment. There is an opportunity to build on this by incorporating explicit references to several regionally significant schemes beyond the city boundary, which would further anchor Brighton & Hove's proposals within the regional investment framework. Doing so would underline the City's contribution to delivering a resilient, inclusive and net-zero transport system for the South East.

Transport for the South East response to the transitional Regional Energy Strategic Plan consultation

Explainer: The purpose of tRESP is to help make the transition from the way that electricity and gas distribution networks are currently planned, to the new Regional Energy Strategic Plan (RESP) approach, which will be in place from 2027. The tRESP is an interim step focused on supporting the process to set the ED3 price control for the electricity distribution network operators (DNOs).

About you / your group / your organisation

Question 5. Please give a brief overview of your organisation:

Response:

TfSE is the 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, National Highways, Network Rail and Transport for London.

We have a vision-led Transport Strategy in place to influence government decisions about where, when and how to invest in our region to 2050. Our Strategic Investment Plan (SIP) provides the delivery framework for this strategy, setting out the infrastructure and policy interventions needed across the region over the next three decades. This is in the process of being refreshed.

TfSE brings evidence on future transport demand, fleet electrification and spatial development that can help ensure regional energy planning fully reflects where and how transport will drive future electricity needs.

Nations and Regions Contexts

Question 1. Are the Nations and Regions Contexts accessible, clear and easy to interpret? What improvements would you like to see?

- **Yes - please suggest any improvements:**
  _____

- **No - please suggest any improvements:**
  _____

<u>Selection:</u> Yes

Response:

The Nations and Regions Contexts are well structured and provide useful summaries of energy system characteristics. However, they remain largely energy-sector focused and would benefit from a clearer articulation of how regional transport demand and spatial development patterns interact with energy needs.

For the South East, the context should explicitly recognise:

- _The scale and diversity of transport demand linked to ports, airports and freight corridors._

- _High inter-regional commuting flows to London and the wider South East, which influence daily energy demand._

Accessibility could also be improved through the publication of supporting datasets in open, map-based formats, allowing regional partners to overlay their own evidence and test assumptions.

Question 2. How well do the Nations and Regions Contexts reflect your understanding of your nation or region?

- _Extremely well_

- _Very well_

- _Moderately well_

- _Slightly well_

- _Not well at all_

Selection: _Moderately well_

Justification:
The Nations and Regions Contexts capture many of the South East's broad energy

characteristics, but they only partially reflect the region's transport-related energy demand. The South East's distinct combination of ports, airports, major freight corridors and dispersed rural communities creates patterns of electricity demand that differ from other regions. Greater emphasis on these transport–energy linkages, and clearer spatial representation of cross-boundary movements to and from London, would make the context more accurate and actionable.

Question 3. Do you agree with the elements and topics included in the Nations and Regions Context and is there anything missing that you would have expected to see?

- Yes _____

- Maybe _____

- No _____

Selection: *Maybe*

Justification:
The elements and topics provide a useful foundation, but the current scope under-represents transport and spatial development drivers of energy demand. The context would benefit from explicit coverage of:

- *Transport electrification across all modes, including HGVs, LGVs, and buses.*

- *The energy needs of ports, airports and potential transport energy hubs.*

- *Use of Sub-national Transport Bodies' evidence base.*

Including these would ensure the Context provides a more complete view of how place-based transport patterns will shape regional electricity requirements in the South East.

Question 4. How do you envisage using the Nations and Regions Context(s)?

Transport for the South East would use the Nations and Regions Context as an evidence base to support integration between transport and energy planning. In particular, it would:

- *Inform dialogue with Distribution Network Operators and NESO on where transport-driven energy demand is likely to arise.*

- *Support local authorities in aligning future Local Area Energy Plans with strategic transport corridors and growth areas.*

- *Provide baseline data to inform TfSE's work on the identification of potential strategic freight energy hubs and to support investment prioritisation, ensuring that future transport schemes take account of grid capacity and reinforcement requirements.*

Used in this way, the Context would help ensure that transport decarbonisation and energy system planning evolve coherently across the South East.

Question 5**. Do you have any feedback on the data selected for the specific topics included for the Nations and Regions Contexts?**

Response:
The selected datasets provide a strong foundation for understanding regional energy demand, but the transport dimension could be strengthened. In particular, there is limited visibility of data on:

- *Energy demand associated with transport hubs such as ports, airports and rail terminals.*

- *The location and capacity of bus and freight depots transitioning to zero-emission fleets.*

- *Spatial distribution of public and private EV charging infrastructure, especially along strategic corridors.*

- *Future housing and employment growth areas that will influence transport energy demand.*

Improving access to these datasets, ideally through open and map-based formats, would enhance the accuracy and usability of the Nations and Regions Contexts for transport and spatial planning purposes.

Question 7. What additional data do you think we should be considering either for tRESP or full RESP?

Additional datasets that would improve both the transitional and full Regional Energy Strategic Plans include:

- *Transport decarbonisation datasets – including the location, capacity and growth trajectories of EV charging sites, bus depots, rail traction power and potential strategic freight energy hubs.*

- *Freight movement data – to identify energy demand around ports, distribution parks, construction material hubs and major freight corridors such as the M25, M3–M27–A27 and the M20/A20 and M2/A2.*

- *Land-use and growth forecasts – from local plans and Sub-national Transport Bodies, data sets, showing where new housing and employment growth will drive future energy demand.*

- *Grid capacity and constraint mapping – published at a usable spatial scale for integration with transport investment plans. We understand these data will be made available in future iterations of the RESP.*

Incorporating these datasets would strengthen the regional evidence base and ensure that tRESP and RESP fully reflect the interdependence between transport, energy and place-based growth.

Pathways and Consistent Planning Assumptions (CPAs)

8. The purpose of the tRESP Pathways is to drive consistency across DNO forecasting, as part of their business plans for 2028-2033 (ED3). Are the steps we are taking to drive consistency, via the baselining and alignment, clear and proportionate? Are the set of tRESP building blocks and the approach to creating Pathways fit for purpose?

- **Yes - please explain: _____**

- **Maybe - please explain: _____**

- **No - please explain: _____**

Selection: Maybe

The approach to baselining and alignment is logical and proportionate for this transitional stage, and the intention to improve consistency across DNO forecasts is strongly supported. However, the current set of building blocks and pathways does not yet fully capture transport-related demand drivers.

To be fully fit for purpose, the Pathways should:

- *Integrate transport electrification forecasts from the Department for Transport and Sub-national Transport Bodies, including data on bus, freight and rail depot transitions.*

- *Reflect the spatial and temporal variability of transport demand, particularly around ports, airports and logistics corridors.*

- *Provide transparency on how assumptions differ from local and national transport decarbonisation trajectories.*

Strengthening these elements would make the Pathways a more reliable foundation for both energy network planning and transport investment sequencing in the South East.

Question 9. Will your organisation use the Pathways? If yes, which of the building blocks and for what purpose?

- **Yes - please explain: _____**

- **Maybe - please explain: _____**

- **No - please explain: _____**

Selection: Yes

Transport for the South East would use the Pathways to inform the integration of transport decarbonisation and energy network planning across the region. In particular, we would draw on the transport demand and electrification trajectories to assess the scale and timing of grid reinforcement required for EV charging infrastructure and strategic freight energy hubs.

Question 10. Pathways will be published for each building block, down to Grid Supply Point feeding area, and for each RESP nation/region. What is your preferred format to receive the Pathways?

Transport for the South East would prefer the Pathways to be published in open, map-based and machine-readable formats, allowing integration with spatial transport and infrastructure datasets and models.

Question 11. The objective of the tRESP CPAs is to drive consistency across DNO demand forecasting as an input to DNOs' network impact assessment to create their business plans for the ED3 period (2028-2033). Will your organisation use the tRESP CPAs for other purposes? If so, for what purpose? Is the format of the CPA value workbook usable for this purpose?

- **Yes _____**

- **Maybe** _____

- **No** _____

Selection: Yes

Transport for the South East would use the Consistent Planning Assumptions (CPAs) to ensure alignment between regional transport planning and energy network forecasting. In particular, TfSE could apply the CPAs to:

- *Test the compatibility of transport decarbonisation pathways with regional electricity demand forecasts.*

- *Support local authority partners in aligning future Local Area Energy Plans with strategic transport corridors and recharging infrastructure programmes.*

- *Provide a common evidence base for engagement with Distribution Network Operators and NESO on future investment needs.*

Question 12. Are the definitions of the CPAs clear, as described in the tRESP methodology and detailed design document and the tRESP CPA value workbook?

- **Strongly agree - please explain:**

_____

- **Somewhat agree - please explain:**

_____

- **Neither agree nor disagree - please explain:**

_____

- **Somewhat disagree - please explain:**

_____

- **Strongly disagree - please explain:**

_____

Selection: *Somewhat agree*

The definitions of the Consistent Planning Assumptions (CPAs) are broadly clear and well structured, providing a transparent framework for aligning Distribution Network Operator forecasts. However the CPA value workbook does not currently include explicit assumptions for heavy goods vehicles or other freight modes. This represents a significant evidence gap for the South East, where port, airport and logistics activity are major drivers of electricity demand. However, we understand that further work will be undertaken to integrate freight

and non-road modes into future RESP iterations. This work should draw on Sub-national Transport Body evidence.

Question 13. Based on the methodology, do you agree with the values established as tRESP CPAs in the value workbook? If not, are there any additional or alternative data sources which are more appropriate? Answers should refer to specific CPA numbers e.g. EV01 and adhere to these criteria: • Be based on a reliable source • Be relevant • Be up-to-date • Be location-specific • Consider changes through time, and • Consider weather and climate impact.

Selection: Maybe
Transport for the South East supports the overall methodology used to derive the tRESP Consistent Planning Assumptions (CPAs) and recognises the need for national alignment across DNO forecasts. However, several CPA values could be strengthened to improve relevance to transport decarbonisation in the South East.

On electric vehicle uptake, the national averages provide a consistent baseline, but they do not capture regional variation in vehicle ownership or travel patterns. Forecasts from Transport for the North's EVCI Visualiser tool that has been deployed to all STBs, offer a more spatially granular and evidence-based view of likely charging demand across different geographies. Using this dataset would improve the realism and location-specific accuracy of future CPAs.

The absence of an explicit CPA for HGV and LGV decarbonisation remains a significant gap. Freight transition data from DfT's Zero Emission HGV trials, National Grid's Future Energy Scenarios, and Sub-national Transport Body freight studies should be incorporated to reflect depot and logistics energy demand more accurately.

Including these sources in the full RESP will make it more representative of real-world transport energy needs and better support regional planning in the South East.

Question 14. Do you agree with the scope and granularity of the assumptions in the CPA value workbook, considering the materiality and complexity of implementation of a more detailed or granular approach? If not, can you provide evidence to support the use of a more or less detailed or granular approach? See the value workbook for an overview and further detail of the scope and granularity of the tRESP CPAs.

- **Strongly agree - please explain:**

_____

- **Somewhat agree - please explain:**

_____

- **Neither agree nor disagree - please explain:**

_____

- **Somewhat disagree - please explain:**

_____

- **Strongly disagree - please explain:**

_____

Selection: Somewhat agree

The current level of granularity in the CPA value workbook is appropriate for a transitional stage and provides a manageable framework for DNO forecasting. However, the transport assumptions would benefit from greater spatial and modal resolution to capture regional variation in demand.

In particular:

- *EV uptake and charging assumptions should be represented at a finer spatial scale, ideally down to Local Authority or Grid Supply Point level to ensure they align with the distribution of transport activity and local energy constraints. Tools such as Transport for the North's EVCI Visualiser demonstrate that a more granular approach can be implemented effectively using existing datasets.*

- *Freight energy demand requires at least corridor-level granularity (e.g. M25, M3–M27–A27, Thames Estuary) to reflect depot clustering and port-related power needs.*

These refinements would add limited complexity but significantly improve the realism and planning value of the CPAs, particularly for regions where transport is a dominant energy driver.

Strategic Investment Need (SI Need)

Purpose (explainer)

The tRESP defines *Strategic Investment Need* as the **evidence-based identification of areas where coordinated investment in the electricity network is required** to support future demand, generation, and flexibility needs.
It is designed to show **where and when** reinforcement or flexibility solutions may be required to deliver least-regret outcomes across regions and DNO boundaries.

NESO describes SI Need as a **transitional concept** that will evolve into a more data-driven, spatially detailed product under the full RESP from 2027.

Framing and approach

In the tRESP, SI Need is framed around two key assessment dimensions:

- **Strategic Value** – the expected long-term importance of an area to meeting national or regional energy, decarbonisation, or growth objectives.

    o This includes the scale of demand or generation growth, links to major industrial clusters or growth corridors, and contribution to net zero.

- **Uncertainty** – the degree of confidence in those future outcomes, based on the maturity of supporting evidence, policy commitments, or local delivery programmes.

    o Areas with high Strategic Value but also high Uncertainty are flagged as priorities for further analysis and engagement rather than immediate investment.

Together, these criteria are used to **classify "emerging areas of Strategic Investment Need"** that will inform Distribution Network Operator (DNO) business plans for the **ED3 period (2028–2033)**.

Question 15. Do you feel that the definition and framing of Strategic Investment Need (SI Need) is clear?

- *Strongly agree - please explain:*

_____

- *Somewhat agree - please explain:*

_____

- *Neither agree nor disagree - please explain:*

_____

- *Somewhat disagree - please explain:*

_____

- *Strongly disagree - please explain:*

_____

Selection: *Somewhat agree*

The definition and framing of Strategic Investment Need (SI Need) are broadly clear and provide a useful basis for identifying areas where coordinated reinforcement is required.

However, the framework would benefit from a stronger link between energy system need and place-based transport investment priorities.

Question 17. Does the combination of RESP area narratives, maps, and hotspot descriptions provide a clear and helpful picture of where emerging needs are arising? Is the level of detail suitable for your purposes?

• **Strongly agree - please explain:**
_____

• **Somewhat agree - please explain:**
_____

• **Neither agree nor disagree - please explain:**
_____

• **Somewhat disagree - please explain:**
_____

• **Strongly disagree - please explain:**
_____

Selection: Somewhat agree
The combination of narratives, maps and hotspot descriptions gives a useful overview of where energy system pressures are beginning to emerge. The regional framing is clear and provides a good starting point for future coordination between NESO, DNOs and local partners.

However, the current level of detail is too high-level for direct use in transport or spatial planning. To be more actionable, the mapping should:

- *Include transport-related energy demand hotspots, such as ports, airports, rail terminals, bus and freight depots, strategic freight energy hubs and key motorway corridors.*

- *Be published at a consistent and open spatial scale (for example, Grid Supply Point or Local Authority level) so that partners can overlay their own data.*

- *Offer a short narrative summary of how each hotspot was identified, including data sources and assumptions.*

These refinements would make the emerging SI Need picture clearer and more usable for regional infrastructure coordination in the South East.

Question 18. What level of geographic detail would be most useful in future versions? For example:

Appendix 2 – National Energy System Operator transitional Regional Energy Strategic Plan Consultation

Local authority boundaries

Project-level details

Place-based clusters or zones

GSP (Grid Supply Point) boundaries

Thematic areas (e.g. heat networks, industrial clusters)

Lower layer super output area / data zone

Anything else? (Please explain)
_____

Response:
Transport for the South East would find the following levels of geographic detail most useful in future versions of the RESP:

☑ **Place-based clusters or zones** *– to align with multi-sector growth areas and transport corridors.*
☑ **GSP (Grid Supply Point) boundaries** *– to enable integration with DNO datasets and Local Area Energy Plans.*
☑ **Local authority boundaries** *– for consistency with transport and spatial planning geographies used by constituent authorities.*
☑ **Thematic areas** *– such as transport electrification hubs, freight and logistics clusters, and port or airport energy zones.*

Additional suggestion:
Future iterations should provide an interactive map layer *allowing partners to view and overlay these geographic scales simultaneously. This would support coordination between transport, energy and land-use planning at both regional and local levels.*

Question 19. Do you see a role for these outputs in supporting local planning, infrastructure alignment, investment proposals?

- **Yes - please explain:**
_____
- **Maybe - please explain:**
_____
- **No - please explain:**
_____

Selection: Yes

The outputs from the RESP have clear potential to support local planning, infrastructure alignment and investment prioritisation. For Transport for the South East, they would help:

- *Align transport and energy investment programmes, particularly for EV charging, bus depots, strategic freight energy hubs, and port and airport connections.*
- *Provide a consistent regional evidence base for future Local Area Energy Plans, enabling authorities to plan within realistic grid capacity constraints.*
- *Strengthen the strategic justification for business cases and funding bids, by demonstrating alignment with nationally recognised areas of Strategic Investment Need.*
- *Improve coordination between DNOs, local authorities and Sub-national Transport Bodies, ensuring that planned transport interventions are matched with timely energy reinforcement.*

Used in this way, the RESP outputs would form an essential bridge between energy system planning and place-based infrastructure delivery in the South East.

Question 20. Are there any locations you would expect to see identified as SI Need that are not currently being assessed? Please highlight these and, where possible, provide supporting information.

- **Yes - please explain:**
_____
- **No - please explain:**
_____

Selection: *Yes*

Explanation:
A number of transport-related locations in the South East appear under-represented in the emerging SI Need assessment. These areas are already showing strong or imminent growth in electricity demand linked to the decarbonisation of surface transport and logistics:

- M3–M27–A27 corridor (Solent and Sussex coast): Concentration of port, airport and freight activity around Southampton, Portsmouth and Brighton, with energy demands likely to intensify significantly as international ferries are electrified, and growing demand from bus and HGV depot electrification.
- Thames Estuary and North Kent corridor: Rapid logistics and construction-related demand associated with Thames Gateway ports (Tilbury, London Gateway) and Lower Thames Crossing preparation works.
- Gatwick–Crawley–Brighton axis: Airport operations and planned public transport electrification, combined with surrounding employment growth.
- M25 orbital and radial routes: High intensity of HGV and coach movements, motorway service areas, and logistics parks requiring rapid-charging infrastructure.

- Ashford and East Kent growth areas: Electrification of rail depots and local bus networks alongside planned housing and employment expansion.

Each of these locations aligns demonstrates a clear overlap between regional transport priorities and future grid reinforcement needs.

Transport for the South East (TfSE) draft response to NESO's RESP Methodology Consultation

About you / your organisation (mandatory questions)

Q1. What is your name?

[Insert: Benn White]

Q2. What is your email address?

[Insert: Benn.White@transportforthesoutheast.org.uk]

Q3. What is your role / job title?

Project Manager

Q4. What is your organisation name?

Transport for the South East (TfSE)

Q5. Please give a brief overview of your organisation

TfSE is the Sub-national Transport Body for the South East of England. Our Partnership Board brings together 16 local transport authorities, district/borough councils, protected landscapes, business representatives, National Highways, Network Rail and TfL. We have a vision-led Transport Strategy to 2050 and a Strategic Investment Plan (being refreshed). TfSE brings evidence on transport demand, fleet electrification and spatial development to support RESP in reflecting transport-driven electricity needs.

Q6. Which category best describes your organisation? (Select all that apply)

- Local authority or representative of local authorities
- Non-energy infrastructure provider — transport

Q7. Which Nation or Region are you / your organisation located in, or interested in? (Select all that apply)

- South East

Q8. Has your response been approved by your internal governance / approval process, where relevant?

Response will be taken to the TfSE Partnership Board on 2 February 2025 for review and approval.

Q9. Following your submission, are you happy to be contacted specifically in relation to this consultation, to further understand your views?

[Proposed: Yes]

Q10. How would you like us to treat your response?

[Proposed: My response can be published]

Terminology

Q1. Do you agree that in Scotland and Wales the strategic plans outlined in this methodology should be known as the Scotland RESP and Wales RESP respectively?

Selection: Strongly agree

Q2. If not, what alternative should be used?

Not applicable. We support the proposed terminology.

Engagement

Q1. Do you agree with our approach to engagement as we develop the RESPs?

Selection: Somewhat agree

Q2. Please provide your reasoning?

We broadly agree with NESO's proposed approach to engagement and welcome the strong emphasis on place-based, transparent and collaborative engagement, alongside the intention to reflect local priorities through locally sourced data. In particular, we support NESO's commitment to engage with customers and stakeholders "for the first time ever" at this scale, and to draw on local inputs such as local growth plans, local transport and housing data, and Local Area Energy Plans (LAEPs) where these exist, so that regional priorities are meaningfully reflected in each RESP.

However, we consider that the effectiveness of the engagement approach will depend on how consistently it is implemented and how well it supports continuous, two-way engagement throughout RESP development. We therefore suggest that NESO may wish to strengthen the engagement approach in three practical ways:

1) Make engagement continuous, structured and "through-process"
NESO's proposals for engagement provide a good foundation, but local authority and cross-sector participation will be most valuable if engagement is structured as an ongoing cycle aligned to key development stages of the RESP. We suggest NESO may wish to publish a clear engagement calendar (including evidence "submission windows" and review points) so stakeholders can contribute at the moments when their input will have the greatest influence on outputs. This would help ensure the place-based intent of the process is realised in practice and reduce the risk of late-stage challenges to assumptions.

2) Formalise an STB-enabled route for transport and cross-boundary intelligence

In the South East, transport is a major driver of future electricity demand and spatial patterns of growth, including demand linked to ports, airports, freight corridors and depot electrification. We suggest NESO may wish to ensure engagement explicitly captures these transport-energy linkages and cross-boundary impacts, particularly where travel-to-work and logistics patterns cross regional boundaries. As the Sub-national Transport Body for the South East, TfSE can support NESO by convening local authorities to provide local area intelligence and evidence on transport electrification, corridor demand and strategic hubs. This would complement NESO's engagement programme and help avoid duplicated requests to the same local stakeholders.

3) Ensure engagement is supported by accessible data and usable draft outputs
We welcome NESO's direction of travel on providing additional support to enable local authorities to engage effectively. In practice, engagement will be significantly more efficient if stakeholders can respond to draft outputs in open, map-based formats based on familiar local geographies (e.g. local authority areas), supported by clear explanations of datasets, assumptions and metrics and "what changed" notes between versions. This would enable local actors to validate assumptions quickly and provide evidence-based feedback, rather than relying on narrative-only engagement.

Overall, TfSE supports the direction of travel and would be willing to support NESO's engagement approach as a key regional stakeholder by helping convene South East local transport authorities and by supplying relevant local area intelligence in line with NESO's agreed process and timetable.

Local Actor Support
Q1. Do you agree with the approach we have outlined on local actor support, and how we have phased the delivery?

Selection: Somewhat agree

Q2. Please provide your reasoning?

We broadly agree with NESO's proposed approach and the rationale for phasing delivery, particularly the focus on enabling local authorities to engage effectively and the intent for support to evolve over time.

To maximise effectiveness and reduce engagement inequality, we suggest NESO may wish to:

(i)   define a clear minimum support offer for all local authorities;
(ii)   focus support at the points in the process where local authority insight genuinely shapes the outcome, particularly during the development of Contexts, Pathways and CPAs, and the subsequent spatial interpretation of system needs, rather than spreading effort thinly across all stages; and
(iii)   prioritise practical engagement tools, including open, map based draft outputs and clearly explained data standards, so that local authorities can quickly understand what is being proposed, test it against local evidence, and respond efficiently without a disproportionate burden on resources.

TfSE would be happy to support NESO's programme by convening South East local authorities and helping package transport-related local area intelligence in consistent formats.

Governance

Q1. Do you agree that local authorities should be able to decide whether to send a political representative or officer to the strategic board?

Selection: Somewhat disagree

TfSE supports flexibility in how local authorities engage with the RESP process. However, we consider that this question conflates two distinct roles within established local government governance arrangements.

In practice, strategic oversight and decision making are undertaken by elected members, who provide democratic legitimacy and accountability for decisions that have material implications for place-based priorities. Officers play a critical and complementary role in advising members, developing evidence, testing assumptions and supporting implementation, but do not typically act as decision makers at strategic board level.

While RESP Strategic Boards are not decision-making bodies in the sense of approving investment or allocating funding, they do shape and endorse assumptions and interpretations that will inform future network planning and investment decisions. On this basis, TfSE considers it appropriate that local authority representation on Strategic Boards is from elected members. At the same time, effective RESP development depends on sustained officer involvement. TfSE therefore recommends that NESO makes explicit provision for officer led technical and working groups to support the Strategic Board, responsible for developing analysis, resolving detailed issues, and formulating recommendations. Officers should also be enabled to attend Strategic Board meetings in an advisory capacity, including presenting evidence and responding to technical questions.

Clarifying this two layer approach would align RESP governance with established local government practice, ensure democratic legitimacy, without adding unnecessary complexity. As the Sub-national Transport Body for the South East, TfSE would be happy to support NESO in refining the methodology to clearly articulate these roles.

Q3. Do you agree with our proposed voting structure for strategic boards?

Selection: Somewhat agree

We broadly agree with NESO's proposed voting structure, including the intent to apply a consistent model across nations and regions and the use of a two-thirds approval threshold to secure strong consensus for whole-system plans. We also recognise the need for clear decision-making arrangements given the strategic board's mix of local government, network and cross-sector representation.

To strengthen confidence and ensure decisions reflect genuine whole-system agreement, NESO may wish to consider:

(i) a simple safeguard that demonstrates meaningful support across core membership groups (e.g., local government and networks), alongside the overall two-thirds threshold;
(ii) clear rules on quorum, abstentions and conflicts of interest; and
(iii) transparent reporting of vote outcomes, including short rationales and how significant dissenting views were addressed.

We note the proposed escalation pathway where agreement cannot be reached, and we welcome clarity on how this will operate in practice. TfSE would be happy to support NESO's process by helping to convene and synthesise local authority perspectives.

Q5. Do you feel any changes should be made to the proposed terms of reference?

Selection: Yes

Q6. Please provide us the details?

Yes. We broadly support the intent of the proposed terms of reference for the Strategic Board , but suggest a few targeted additions that would strengthen effectiveness and consistency. In particular, the terms of reference could more explicitly require continuous, through-process engagement with local authorities reflecting NESO's emphasis on locally sourced data and stakeholder engagement.

We suggest clearer provisions on:
(i) cross-sector/cross-boundary coordination (including where transport and other infrastructure materially shape demand and growth);
(ii) transparency and traceability of decisions (including how feedback and dissent are handled); and
(iii) clarity on how the strategic boards will interface with working groups and the GB Steering Committee.

Q7. Do you agree with our proposals for appointing members of the strategic boards?

Selection: Somewhat agree

We broadly agree with the proposed approach but consider that the effectiveness of the strategic boards will depend heavily on ensuring the right mix of members, particularly those able to reflect how infrastructure decisions play out at a regional scale.

In addition to network and market expertise, NESO may wish to ensure the boards include representation from organisations with direct experience of planning and coordinating major transport infrastructure and its interaction with the energy system across wider geographies. This includes understanding how ports, airports, highways and rail networks shape electricity demand, connection requirements and spatial patterns of growth, and how these pressures vary between regions.

We also suggest that explicit provision is made for port and airport stakeholders to be represented where relevant, given their role as major energy users and enablers of national and regional economic activity. Without this perspective, there is a risk that strategic decisions do not fully reflect the operational realities and future investment needs of nationally significant transport assets.

As the sub national transport body for the South East, Transport for the South East works closely with local authorities, transport operators and infrastructure owners, including ports and airports. TfSE would be well placed to help facilitate appropriate regional and industry participation in strategic boards if invited, helping to ensure that board members are well connected to wider stakeholder networks and that the board will support integrated, place-based decision making rather than sector specific optimisation.

Q9. Do you agree with our proposed design for working groups?

Selection: Somewhat agree

We broadly agree with NESO's proposed design for working groups and welcome the use of thematic groups (including Local Government and Industrial Decarbonisation & Transport) alongside a technical working group to input to Common Planning Assumptions, with mechanisms to resolve cross-sector issues before escalation.

To strengthen effectiveness, NESO may wish to:
   (i)   ensure that transport considerations are made explicitly visible within the governance structure, in a way that reflects their relative importance at a regional scale, for example through a dedicated transport sub group or time-limited task and finish workstream where ports, airports, strategic freight corridors and depot electrification are significant system drivers;
   (ii)   structure the Local Government Working Group as the main route for broad local authority evidence and feedback throughout the RESP cycle; and
   (iii) clarify working group outputs, interfaces and escalation routes so inputs clearly influence draft RESP components and board decisions.

TfSE would be happy to support NESO's approach by convening South East local authorities and transport stakeholders and providing providing a clear, shared picture of local plans, constraints and evidence in consistent formats to reduce duplication and support place-based decision making.

Nations & Regions Contexts — TfSE as a key stakeholder

Q1. Do you agree with the approach for the Nations and Regions Contexts?

Selection: Somewhat agree

Q2. Please provide your reasoning?

We broadly agree with NESO's approach to Nations and Regions Contexts as a long-term view of local conditions and priorities informed by local engagement and data. We also welcome NESO's intention to draw on locally sourced evidence, such as local growth plans, local transport and

housing data and LAEPs where these exist, so that place-specific priorities are meaningfully reflected.

To maximise usefulness, NESO may wish to ensure the Contexts explicitly capture key cross-sector drivers of demand and growth. In the South East, this includes transport–energy interactions (ports, airports, strategic freight corridors, rail traction and depot electrification) and cross-boundary movement patterns. Supporting the Contexts with open, map-based data and with open, map based data and clear information on data sources and assumptions would make the outputs easier for local partners to use and validate.

TfSE would be happy to support NESO's work by convening stakeholders and providing a clear, shared picture of local plans, constraints and evidence in consistent formats to help strengthen the South East Context.

Q3. How do you envisage using the Nations and Regions Contexts and what would make the output work best for your needs?

TfSE would use the Nations and Regions Contexts as a place-based evidence to help better align transport decarbonisation, spatial development and regional energy planning in the South East. We welcome NESO's intention to draw on locally sourced data and engagement and see the Contexts as the key mechanism for consolidating these inputs into a coherent regional narrative and baseline that informs Pathways, CPAs, Spatial Context and SI Need.

To work best for TfSE and local partners, the Contexts should be supported by open, map based datasets that can be readily used by local teams, consistent geography (for example local authority areas), clear information on data sources, and a straightforward way for stakeholders to flag corrections or updates as the RESP develops. TfSE would be happy to support NESO's work by convening local authorities and transport stakeholders and providing curated transport-related local area intelligence aligned to NESO's data standards.

Pathways

Q1. Do you agree with the scope of 'Whole Energy' for RESP Outputs?

Selection: Somewhat agree

Q2. How do you envisage using the RESP Pathways and how can we communicate pathways to support you to use them effectively?

We would expect to use the RESP Pathways as a practical reference point to help align regional and local transport, spatial and infrastructure plans and strategies, understand choices and trade offs, and test proposals against different future scenarios. In practice, the pathways would be used to:

(i) support alignment across strategies, plans and investment programmes;
(ii) identify actions that make sense across most futures, as well as those that depend on specific pathways being realised;
(iii) understand sequencing and dependencies between different interventions;
(iv) strengthen business cases by applying a consistent set of assumptions and stress testing

proposals; and

(v) agree indicators and decision points that support review and adjustment over time.

To be genuinely useful, pathways need to be communicated in a way that works for different audiences. This would include a clear high level summary, more detailed guidance for practitioners, and access to underlying technical material where needed. Plain English explanations of each pathway, how they differ, and what assumptions sit behind them will be important, alongside transparency about uncertainty.

Practical supporting materials, such as simple templates, charts and data, and where appropriate spatial or digital tools, would help partners apply the pathways consistently in their own work. A clear engagement approach and update cycle, including version control and clear explanations of what has changed between iterations, would further support confidence and ongoing use.

Q3. Do you agree with the approach for the RESP Pathways?

Selection: Somewhat agree

Q4. If not, please provide your reasoning?

We are broadly supportive of the proposed approach and agree that a pathways based framework is an appropriate way to support planning under uncertainty. To strengthen the approach in practice, we suggest that NESO should:

(i) make clear how pathways are intended to be used in decision making, with specific examples of the types of decisions they are designed to inform;
(ii) set out assumptions clearly and provide guidance on how uncertainty should be interpreted, including the use of ranges or sensitivities where this is feasible;
(iii) describe dependencies and enabling conditions more explicitly, to support understanding of sequencing and delivery risks; and
(iv) put in place clear governance arrangements, including version control and a defined update cycle with change logs, to support consistent use over time.

Consistent Planning Assumptions (CPAs)

Q1. Do you agree with our prioritisation approach and criteria set out to evaluate the validity of the CPA values?

Selection: Somewhat agree

Q2. Please provide your reasoning?

A clear prioritisation approach and robust validity criteria for CPAs are essential to ensure consistency across regions and to avoid divergent assumptions being applied. To strengthen the approach in practice, we suggest that NESO should:

(i) set out a clear evidence hierarchy, including how conflicting sources will be weighed and resolved;
(ii) define minimum data quality expectations, with clear information on sources, coverage, date and known limitations;

(iii) explain the rationale for selected values and how uncertainty has been treated, including the use of ranges or sensitivities where this is feasible;

(iv) provide guidance on when and how CPAs should be adapted to reflect regional circumstances, and where national consistency should be maintained; and

(v) establish clear governance arrangements, including stakeholder review, version control and defined triggers for refresh.

Q3. Do you agree with our approach for the CPAs?

Selection: Somewhat agree

Q4. Please provide your reasoning?

A CPA workbook and a common set of assumptions should improve consistency and coordination across network areas, and we support the proposed collaborative development approach. To strengthen the approach, we recommend that clearer rules are developed to resolve conflicting evidence and documenting decisions, explicit treatment of uncertainty, clearer guidance on when CPAs vary geographically and over time, and robust governance with version control, clear update cycles and a change log so stakeholders can apply CPAs consistently.

Spatial Context

Q1. Our preferred approach is to move the RESP delivery dates back to enable option 2 (page 75). Do you support this approach and are there any other wider factors we should consider?

Selection: Yes

Q2. Do you agree with our proposed approach for the Spatial Context?

Selection: Somewhat agree

The proposed Spatial Context should improve transparency and support collaboration, including identification of potential Strategic Investment Needs. To strengthen the approach, we recommend:

- Clear decision-led scoping (what it is/isn't for)
- Strong transparency on data provenance/assumptions/limitations
- Clear guidance on granularity constraints and the ability to switch between geographic, network and time views
- Interoperability and reusable outputs; an approach to confidentiality/commercial sensitivity
- Governance with clear update cycles, version control and change logs.

Q4. How do you envisage using the Spatial Context output and how can we communicate the output to support you to use it effectively?

We would expect to use the Spatial Context as a practical, place-based tool to show how Pathways play out spatially alongside existing and planned network capacity and wider whole system information. In practice, it would help us to:

- identify spatial hotspots, where transport, energy and land use pressures overlap, creating binding constraints or clear opportunities and potential locations for Strategic Investment Need;
- support option development, prioritisation and sequencing;
- bring stakeholders together and help align transport, energy and spatial planning activity;
- provide a consistent spatial evidence base to inform strategies and business cases;
- support monitoring and adaptive planning over time.

To support effective use, outputs should be communicated through a layered approach, including a clear high-level summary, practitioner focused use cases and access to technical material where needed. Transparency on data sources, assumptions and limitations will be important, alongside clear guidance on how outputs should be interpreted. The Spatial Context should also provide usable geographic outputs that can be downloaded and applied directly in local and regional work.

Strategic Investment Need (SI Need)

Q1. Do you agree with our description of the three types of complexity and the examples indicated?

Selection: Agree

Q3. What further considerations should we take as we develop the approach for specifying and categorising Strategic Investment Needs to ensure consistent regulatory treatment of network investments? Please provide your reasoning.

To ensure consistent regulatory treatment, SINs should be specified and categorised using standardised criteria, common evidence thresholds and a shared specification template across all regions.

TfSE can support NESO by convening and synthesising comparable place-based evidence across the South East. Potential South East SIN locations could include:

- The M3–M27–A27 corridor; Thames Estuary/North Kent
- Gatwick–Crawley–Brighton; the M25 orbital/radials
- Ashford/East Kent growth areas
- Ports electrification/shore-power programmes

Technical Coordination

Q1. What examples of whole system optimisation opportunities are you aware of and what considerations should we take to identify, prioritise and develop these collaboratively with you?

Examples of whole-system optimisation include:

- Coordinating EV charging hubs and depot electrification with flexibility/storage to reduce peak impacts;
- Aligning ports/airports electrification with local generation/storage and phased connections; and
- Aligning energy works with transport/other utilities to avoid disruption and "dig twice".

To identify, prioritise and develop these collaboratively, we recommend:

- Early hotspot identification using in-development pipelines and spatial mapping
- A transparent prioritisation framework based on whole-system value (cost, carbon, resilience, deliverability, optionality, distributional impacts)
- Aligned data and common assumptions with clear version control
- Practical cross-sector technical working arrangements (including corridor/cluster sessions)

TfSE can help convene transport stakeholders and provide evidence on transport decarbonisation programmes to support coordination in the South East.

Network Planning Assurance

Q1. Do you support the selection of option 2 (page 154) as delivering best value in assuring alignment?

Selection: Yes

Q3. What further considerations should we take as we develop the approach to Network Planning Assurance for gas distribution networks?

Selection: Somewhat agree

For gas distribution network planning assurance, we recommend:

(i)   set out a clear scope that covers transition planning, including repurposing, downscaling and decommissioning, as well as network reinforcement;

(ii)   deal explicitly with uncertainty and future choice, using pathway or scenario based evidence, clear decision triggers and staged investment to manage the risk of stranded assets;

(iii)   recognise safety, security of supply and operational resilience as non negotiable constraints;

(iv)   reflect cross sector impacts and whole system trade offs, for example the interaction between heat electrification and electricity peak demand, in line with the RESP's whole system approach;

(v)   use standardised evidence and clear audit trails to support consistency and comparability across regions; and

(vi)   include clear governance and escalation routes where evidence or assumptions are contested.

Societal Considerations

Q1. Do you agree with our approach to societal considerations? What additional considerations should we make on PSED as we develop the RESPs?

Selection: Somewhat agree

We support translating RESP outputs into indicative societal impacts to inform Strategic Board decisions and welcome the explicit commitment to comply with Public Sector Equality Duty (PSED). To strengthen the approach, PSED "due regard" should be embedded into key decision points, supported by a proportionate EqIA-style process where impacts could be significant. The evidence base should be disaggregated where feasible (e.g., low-income, disabled, older people, rural/digitally excluded groups) and include affordability impacts (who pays vs who benefits, fuel poverty interactions). We also recommend clear monitoring and reporting of societal indicators over time, inclusive engagement and accessibility, and clear roles for recording PSED considerations across NESO and Strategic Boards.

Environmental Approach

Q1. Do you agree with our proposed environmental approach?

Selection: Somewhat agree

A proportionate approach is sensible and we note the position that HRA/SEA are not required at RESP level because RESPs are not prescriptive and will influence rather than constrain future decisions. To strengthen the approach, we recommend:

- set out clear environmental guardrails to inform decision making as pathways and spatial options are developed;
- apply a consistent set of environmental constraints and sensitivity layers within the Spatial Context to support early screening;
- record trade offs transparently, using a clear mitigation hierarchy to show how impacts have been avoided, reduced or addressed;
- give explicit consideration to climate adaptation and resilience alongside mitigation;
- provide a light touch way of identifying potential cumulative impacts across pathways and places; and
- offer clearer guidance on how RESP outputs are intended to support downstream HRA, SEA and consenting processes.

Digital & Data

Q1. Do you have any observations or suggestions on our proposed approach to managing RESP data?

We support the proposed direction, including use of a digital system to log and analyse inputs in compliance with data protection. To strengthen the approach we recommend:

- Clear data governance and ownership ("single source of truth")
- Consistent metadata/provenance and audit trails
- Robust version control and published change logs for citeable outputs

- Interoperability via open/reusable formats (especially for Spatial Context and CPAs)
- Tiered access/role-based permissions for sensitive or commercial data with aggregation/anonymisation options
- Repeatable data quality validation
- Transparency on AI use and safeguards (with human review)
- A coordinated data request catalogue to minimise duplication and burden on stakeholders.

Q2. How frequently do you believe data refreshes should occur to ensure the RESP remains accurate and useful? What criteria should trigger a data refresh?

We recommend a layered approach to ensure the RESP remains both stable for planning purposes and responsive to change.

Frequency

• Full RESP plans: every three years, with clear versioning to provide a stable reference for stakeholders and network business planning.
• Core datasets: refresh annually (e.g., CPAs, baseline demand/supply, network capacity/headroom layers and key indicators), with a published change log explaining what has changed and why.
• Fast-moving datasets: allow continuous updates (e.g., the in-development register and major pipeline indicators), complemented by quarterly "snapshot" releases to provide a consistent reference point for analysis and auditability.

In addition to the planned refresh cycles, we recommend out-of-cycle refreshes where changes would materially affect outputs. Trigger criteria could include:

• Material policy or regulatory changes
• Major updates to upstream national plans/scenarios
• Sustained divergence from key assumptions (e.g., uptake rates or peak demand patterns beyond defined thresholds)
• Major new developments, cancellations or significant delays;
• Material updates to network capacity/constraints data that alter spatial conclusions
• Data quality corrections or agreed methodological changes
• Significant resilience-related events.

To support transparency and consistent use, NESO should publish a refresh calendar, define materiality thresholds for triggers, and set out governance arrangements for approving and communicating out-of-cycle updates.

Overall
Q1. Overall, do you agree with the approaches proposed across the RESP methodology? Are there any elements of the methodology that you would like to see in more detail?

Selection: Somewhat agree

The methodology provides a strong platform for developing place-based, whole-system RESPs. TfSE stands ready to support delivery by convening stakeholders, curating local area intelligence, validating drafts and supporting ongoing monitoring. We would particularly welcome deeper transport–energy integration (freight, ports, airports and cross-boundary corridors) and open, map-based data outputs at useful geographies to help operationalise RESP in ED3 and local energy planning contexts.

Developing the third cycling and walking investment strategy (CWIS3)

1. Introduction

Thank you for responding to this consultation which is asking for your views on what you think the third cycling and walking strategy should include.

Closing date is 15 December 2025.

Print or save a copy of your application

When you get to the end of this questionnaire, you will be offered the chance either to print or to save a copy of your application for your records. This option appears after you press 'Submit your response'. All questions are optional unless marked otherwise.

View all questions

This survey provides questions based on user choice, an overview of the questions is available [opens in a new window]. All survey questions are optional unless stated otherwise.

Save and continue option

You have an option to 'save and continue' your response at any time. If you do that you will be sent a link by email to allow you to continue your response where you left off.

It's very important that you enter your correct email address if you choose to save and continue. If you make a mistake in the email address you won't receive the link you need to complete your response.

Accessibility statement

Read our accessibility statement for SmartSurvey forms [opens in a new window].

Data protection regulations

The Department for Transport (DfT) is running this consultation which is asking for your views on what you think the third cycling and walking strategy should include.

Appendix 4 – Developing the Third Cycling and Walking Investment Strategy (CWIS3)

View our DfT online form and survey privacy notice [opens in a new window] for more information on how your personal data is processed in relation to this survey.

Although we are not asking for sensitive personal data, any that is provided in response to this consultation will be processed under article 9.2.g, substantial public interest, with reference to the Data Protection Act Schedule 1 Part 2 Section 8 for the purpose of equality of opportunity or treatment.

Do not include personal information in your responses unless specifically requested.

2. Your information

1. What is your name?

Benn White

2. What is your email address?

benn.white@transportforthesoutheast.org.uk

3. Are you responding on behalf of an organisation?

☑ Yes

☐ No

3. Organisation details

4. What is your organisation's name?

Transport for the South East

5. What best describes your organisation?

☑ Local authority

☐ Third sector organisation

☐ Private sector organisation

☐ Industry body

☐ Trade body

☐ Professional body

☐ Another type of organisation:

[   ]

4. Local authority

We are proposing a performance monitoring methodology for CWIS3. This includes the following 4 local transport authority performance indicators OF:

- reducing the number of pedestrians and cyclists killed or seriously injured (KSI)
- a percentage increase in active travel stages taken by walking and cycling
- an increase in miles of compliant new and improved active travel network produced
- a maintained or improved active travel capability rating

6. Do you agree or disagree with the proposed approach to performance monitoring of local transport authority outcomes frameworks using the performance indicator of:

	Agree	Disagree	Don't know
reducing the number of pedestrians and cyclists KSI	✓	☐	☐
a percentage increase in active travel stages taken by walking and cycling	☐	✓	☐
an increase in miles of compliant new and improved active travel network produced	✓	☐	☐
a maintained or improved active travel capability rating	✓	☐	☐

If disagreeing explain why?

TfSE does not support using "% increase in stages" derived from National Travel Survey data as a core local indicator as using the NTS data in this way introduces several technical and practical issues.

1. Sample sizes are too small to give stable local estimates.

The NTS is designed for national trend analysis, not LTA-level monitoring. Once the national sample is broken down by geography, the number of walking and cycling stages per LTA becomes very small. This produces high year-to-year volatility that does not reflect real behavioural change but statistical noise.

2. National Stage based data = does not map well to local interventions.

Most LTAs deliver targeted schemes on specific corridors, town centres or schools. National stage-based survey data cannot be linked to these interventions in any meaningful way. It does not show whether a new scheme is used, whether there has been a mode shift along a particular corridor, or whether a town centre has more footfall. Local data is needed to identify these impacts but this can be expensive to collect and many local transport authorities are unable to meet these additional costs from the available budget for the scheme. Consideration needs to be given to selective funding of a number of active travel schemes to demonstrate their impacts.

3. It risks unfair comparisons between authorities.

Because the statistical uncertainty varies widely between LTAs, a single national metric based on NTS stages would create perverse league tables. High-density urban areas would appear "better" simply because their sample is more robust, not because they delivered more effective interventions.

As an alternative, we suggest relying on the locally collected traffic count data, using a balanced basket of measures could include:

(1) a national centrally funded programme of indexed automatic counts of walking/cycling activity, coordinated by ATE or the Sub national Transport Bodies;
(2) school travel mode shares;
(3) town-centre/border cordon counts and counts along key LCWIP corridors;

This package of indicators provides a far more reliable, stable and actionable evidence base. It aligns with how LTAs plan, monitor and justify their investment decisions. This approach requires a national centrally

funded programme coordinated by ATE or by the Sub-national Transport Bodies to ensure consistent and comprehensive coverage of monitoring devices, we propose replacing this indicator with the following package of measures.

We have indicated that we do not disagree with the use of the increase in miles of compliant new and improved active travel network produced as a performance measure. However, it is not simply the total length of new or improved active travel network that matters. What also counts is where schemes are delivered, how they address areas with poor accessibility, and whether they are located in the places where people most rely on walking, wheeling and cycling. We suggest adding indicators such as an accessibility index to show how accessibility has improved as a result of the enhanced network.

5. Local authority

7. How can Active Travel England (ATE) support local authorities in making local targets?

ATE can add the greatest value by pairing multi-year funding certainty with practical technical support that is proportionate and usable across LTA contexts. TfSE recommends:

1) **Target Setting Playbook & Templates** – standardised baselining and trend methods, ready-to-use outcome framework templates and example baselines from official statistics.

2) **Shared Data Services** – authoritative baselines (Active Lives, NTS, Road Safety), open dashboards, guidance on small-area estimation, and co-funding for permanent/temporary foot/cycle counters with Quality Assurance.

3) **Quality & Design Reviews** – expand pre-application design review; keep assessment tools current with LTN 1/20 and inclusive design; offer corridor-level audits to ensure continuity and permeability.

4) **Capability Uplift & Peer Learning via STBs** – co-fund local Active Travel Leads; scale peer learning through TfSE's Centre of Excellence.

5) **Revenue for Activation & Maintenance** – ring-fence revenue for behaviour change initiatives (Bikeability, adult cycle confidence, school streets, travel planning) and for maintenance (surface quality, lighting,

winter service).

7) **Proportional Monitoring & Evaluation** – ATE develops and rolls out a lightweight M&E framework with templates and training so LTAs can evaluate effectively without excessive burden.

8) **Develop a Centralised Case Study Library** - Currently, Transport Analysis Guidance Unit A5.1 proposes several different methods (e.g. comparative study, sketch plan, and transport models), not to mention other methods that are not covered in TAG. It would be useful to establish a centralised case study library demonstrating successful examples under different scenarios and to provide greater consistency.

6. Proposal

We are consulting and asking for your views on what you think the third cycling and walking strategy should include.

This includes:

- what the national vision for active travel should be
- the objectives which support the long-term vision for active travel
- the performance monitoring methodology including what both the key and further performance indicators should be

[Full information on our proposals is given within our consultation information](#).

The government has proposed the national vision for active travel as:

"By 2035, the government wants walking, wheeling and cycling to be a safe, easy and accessible option for everyone — allowing people to embed the economic, health and environmental benefits of active travel into their daily life if they choose."

8. Do you agree or disagree with the proposed national vision for active travel?

✓	Agree
	Neither agree nor disagree
	Disagree
	Don't know

7. Disagree with national ambition

9. Why do you disagree with the proposed national vision for active travel and what potential alternatives do you suggest?

N/A

8. Ensuring people are safe to travel objective

We are proposing 2 new objectives for CWIS3 that will support the long-term vision for active travel. These are:

1. Ensure people are safe to travel actively.
2. Ensure people feel it is an easy choice.

These proposed objectives capture the main barriers preventing people from walking, wheeling and cycling particularly for women and children.

10. Do you agree or disagree with the objective: 'Ensure people are safe to travel actively'?

☑ Agree

☐ Neither agree nor disagree

☐ Disagree

☐ Don't know

9. Disagree with ensure people are safe to travel actively

11. Why do you disagree with the objective: 'Ensure people are safe to travel actively' and what potential alternatives do you suggest?

N/A

10. Ensuring people feel it is an easy choice objective

12. Do you agree or disagree with the objective: 'Ensure people feel it is an easy choice'?

✓ Agree

☐ Neither agree nor disagree

☐ Disagree

☐ Don't know

11. Disagree with ensuring people feel it is an easy choice objective

13. Why do you disagree with the objective: 'Ensure people are safe to travel actively' and what potential alternatives do you suggest?

N/A

12. Performance monitoring

We are proposing a performance monitoring methodology for CWIS3. This includes key performance indicators that reflect the output of government investment into active travel through a range of official statistics.

The key performance indicators are to:

- increase the percentage of people that achieve 150 mins a week activity through active travel by 2030
- increase the percentage of walking and cycling stages per person by 2030
- increase the percentage of walking and cycling trips per person to and from school
- decrease the rate of cyclists and pedestrians killed on England's roads, measured as the number of fatalities per billion miles walked and cycled

- decrease the rate of cyclists and pedestrians seriously injured on England's roads, measured as the number of serious injuries per billion miles walked and cycled
- decrease the percentage of people walking and cycling concerned about safety

14. Do you agree or disagree with the following proposed key performance indicators?

	Agree	Neither agree nor disagree	Disagree	Don't know
Increase the percentage of people that achieve 150 mins a week activity through active travel by 2030	✓	☐	☐	☐
Increase the percentage of walking and cycling stages per person by 2030	✓	☐	☐	☐
Increase the percentage of walking and cycling trips per person to and from school	✓	☐	☐	☐
Decrease the rate of cyclists and pedestrians killed on England's roads, measured as the number of fatalities per billion miles walked and cycled	✓	☐	☐	☐
Decrease the rate of cyclists and pedestrians seriously injured	✓	☐	☐	☐

	Agree	Neither agree nor disagree	Disagree	Don't know
on England's roads, measured as the number of serious injuries per billion miles walked and cycled				
Decrease the percentage of people walking and cycling concerned about safety	✓	☐	☐	☐

If disagreeing explain why.

Do not disagree with the performance indicators but an additional one is needed focussed on short distance trips (e.g. less than 2 miles), where trips are more likely to shift to active travel modes.

13. ATE monitoring

We are proposing a performance monitoring methodology for CWIS3.This includes performance indicators directly relating to the outputs of the work of Active Travel England based on annual reporting metrics. The further performance indicators are:

- improved local authority active travel capability ratings
- percentage of average increase in scheme quality
- percentage of planning applications within our thresholds responded to within the statutory timescale (%)
- increased number of people actively engaged via activation programmes (including Bikeability)
- increased percentage of ATE capital projects completed on schedule (%)
- increasing the number of trained active travel professionals including local authority officers

15. Do you agree or disagree with the following indicators relating to the work of Active Travel England?

Appendix 4 – Developing the Third Cycling and Walking Investment Strategy (CWIS3)

	Agree	Neither agree nor disagree	Disagree	Don't know
Improved local authority active travel capability ratings	✓	☐	☐	☐
Percentage of average increase in scheme quality	✓	☐	☐	☐
Percentage of planning applications within our thresholds responded to within the statutory timescale (%)	✓	☐	☐	☐
Increased number of people actively engaged via activation programmes (including Bikeability)	✓	☐	☐	☐
Increased percentage of ATE capital projects completed on schedule (%)	✓	☐	☐	☐
Increasing the number of trained active travel professionals including local authority officers	✓	☐	☐	☐

If disagreeing explain why.

N/A

14. Final comments

16. Any other comments?

TfSE strongly supports the overall direction of CWIS3 and welcomes its alignment with our Transport Strategy, particularly the missions on Decarbonisation, Inclusion & Integration, Strategic Connectivity, and Sustainable Growth. We believe the strategy can deliver significant benefits if implemented with flexibility and a strong focus on local context.

The TfSE area includes rural and coastal areas where longer trip distances, severance on major roads, and seasonal demand create unique challenges.

Local performance indicators need to be practical and robust. We believe that analysing percentage increases in trip stages at the LTA level using NTS data would be extremely challenging due to limited sample size at local level. Instead, we suggest relying on the locally collected traffic counts data, using a balanced basket of measures. This approach requires a national centrally funded programme coordinated by ATE or by the Sub-national Transport Bodies to ensure consistent and comprehensive coverage of monitoring devices.

Monitoring and evaluation should be proportionate. ATE could provide a clear Monitoring Playbook with standard methods, open dashboards, and co-funding for counters to help LTAs deliver consistent, high-quality data without excessive burden.

Finally, capital investment must be matched with revenue funding. Behaviour change programmes like Bikeability, adult cycle confidence, and school streets are essential to convert infrastructure into real uptake. There is also a persistent gap in local travel behaviour data. While the National Travel Survey is valuable for national trends, as noted earlier, it cannot provide the granularity needed for local scheme design or for tracking change over time. A coordinated approach led by ATE or the STBs could help authorities collect consistent, continuous-use travel data at a scale that balances cost, comparability and detail, strengthening both business cases and performance monitoring.

Appendix 5 – Draft response on proposals for Local Government Reorganisation in East Sussex, Brighton and Hove, and West Sussex

Transport for the South East response to the consultation on proposals for local government reorganisation in East Sussex, Brighton & Hove, and West Sussex

Transport for the South East (TfSE) welcomes the opportunity to respond to this consultation.

About TfSE

TfSE is the 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, National Highways, Network Rail and Transport for London.

Neutral stance on governance structures

TfSE does not take a position on specific options for local government reorganisation – this is for Government and our local authority partners to determine.

TfSE will remain a constructive partner to all our local authorities, whilst being adaptable to final governance arrangements. TfSE will continue to provide strategic evidence, regional planning expertise, and a forum for collaboration on transport priorities that extend beyond individual local areas.

TfSE remain committed to supporting authorities and Government to ensure that transport planning and investment contribute positively to sustainable growth, improved connectivity, and better outcomes for communities across Sussex and Brighton and the rest of our region.

Appendix 6 – Draft response on proposals for Local Government Reorganisation in Hampshire, Isle of Wight, Portsmouth and Southampton

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TfSE remain committed to supporting authorities and Government to ensure that transport planning and investment contribute positively to sustainable growth, improved connectivity, and better outcomes for communities across Hampshire and the Solent and the rest of our region.