

Agenda Item 10

Report to: Partnership Board –Transport for the South East

Date of meeting: 19 October 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, and to note recent letters of support submitted for our local authorities bids to the Structures Fund.

RECOMMENDATIONS:

The Members of the Partnership Board are recommended to:

- 1) Agree the draft response to the Urban Transit Group's consultation on the Mass Transit Taskforce.**
- 2) Agree the draft response to DfT's consultation on the Draft Heathrow Expansion National Policy Statement.**
- 3) Agree the draft response to the DfT's consultation to the Strategic Charging Infrastructure Scheme.**
- 4) Agree the draft response to the DfT's consultation on the RIS3 Variation**
- 5) Note the submission of a letter of support for the Sussex and Brighton Strategic Authority's bid for Digital Twin funding.**
- 6) Note the submission of eleven letters of support for local authority bids to the Structures Fund.**

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:

- Urban Transit Group's consultation on the Mass Transit Taskforce.
- DfT's consultation on the Draft Heathrow Expansion National Policy Statement.
- DfT's consultation to the Strategic Charging Infrastructure Scheme.

1.2 This also includes letters of support for:

- Eleven LTA bid submissions to the Structures Fund

2. Urban Transit Group's Call for Evidence – Mass Transit Taskforce

2.1 In August 2026, TfSE responded to Urban Transit Group's Call for Evidence - 'Mass Transit Taskforce'. This response is contained in **Appendix 1**.

2.2 The response welcomed the opportunity to contribute and noted the growing need for mass transit in the South East as identified in the TfSE Transport Strategy with several major urban areas now large enough to justify higher-quality public transport to support economic growth, housing and regeneration.

2.3 The response encouraged the taskforce to note that long-term institutional stability is critical to successful delivery. The biggest barrier is often not project governance itself but maintaining continuity through long development timescales that outlast political cycles, funding programmes and organisational change. Government should provide greater policy and governance stability.

2.4 The TfSE response also notes that successful delivery depends on long-term strategic planning and collaboration, particularly across local authority boundaries, with Sub-national Transport Bodies playing an important coordinating role. A further factor for consideration is the need for greater institutional and funding certainty, as changing policies, governance arrangements and short-term funding programmes create delays, increase costs and make scheme development less efficient.

2.5 The response noted a stable pipeline of investment is essential to build and retain capability, enabling authorities to develop the specialist skills and expertise needed to bring mass transit schemes forward successfully.

3. Department for Transport - Draft Heathrow Expansion National Policy Statement: consultation on proposed amendments

3.1 In August 2026 TfSE responded to the DfT consultation on proposed amendment to the Draft Heathrow Expansion National Policy Statement which is contained in **Appendix 2**.

3.2 Transport for the South East (TfSE) confirms its neutral position on Heathrow expansion itself, neither supporting nor opposing the proposed third runway. While recognising Heathrow's importance as the UK's primary international hub airport and a key driver of connectivity, trade and economic activity. TfSE consistently argues that airport growth should only proceed where the necessary road, rail, freight and public transport infrastructure is fully funded, consented and operational, with all impacts assessed across the wider South East rather than solely around Heathrow.

3.3 A central theme throughout TfSE's response is the need for stronger requirements on surface access and network capacity. It calls for Heathrow to make substantial contributions towards strategic schemes such as Southern Rail Access and Western Rail Access to Heathrow, alongside increased investment in bus, coach and mass transit services.

3.4 On environmental matters, TfSE generally supports the government's proposed tests on air quality, noise and climate change. TfSE advocates binding performance thresholds, independent monitoring, enforceable mitigation measures and clear consequences where agreed standards are not met.

3.5 The TfSE response proposes a series of amendments to the final HENPS to ensure that Heathrow's growth is supported by a comprehensive and sustainable surface access strategy. This includes explicitly recognising Southern and Western Rail Access to Heathrow, alongside complementary bus, coach and mass transit services, as strategic components of passenger access. TfSE also seeks a requirement that each phase of airport expansion is matched by funded, consented and operational transport infrastructure, services and mitigation measures, with cumulative impacts assessed across the wider South East, including London and neighbouring regions.

3.6 The response sets out that TfSE believes Heathrow Airport should be responsible for the full reasonable cost of transport mitigation and its share of enabling and consequential network improvements. It also calls for stronger provisions to maximise the movement of airport-related freight, construction materials and waste by rail rather than road, supported by funded delivery plans and measurable targets. Existing passenger and freight services should be protected, and airport growth should not come at the expense of planned transport improvements elsewhere. In addition, separate and enforceable targets should be established for passenger, staff, freight and construction travel through an Environmentally Managed Growth framework.

3.7 TfSE recommends that the HENPS secures affordable, accessible and fully integrated public transport throughout airport operating and shift-working hours, while providing TfSE and other Sub-national Transport Bodies with a formal advisory role in developing and reviewing Heathrow's Surface Access Strategy. This would help ensure consideration of cross-boundary and cumulative impacts and alignment with regional transport priorities. These recommendations also reflect the position of the Heathrow Strategic Planning Group Surface Access Group, of which TfSE is a member. TfSE welcomes continued engagement with the Department for Transport, Heathrow Airport Limited, affected authorities and delivery partners as the HENPS.

4. Department for Transport Strategic Charging Infrastructure Scheme consultation

4.1 The Department for Transport and Office for Zero Emissions Vehicles opened their consultation in June 2026. TfSE submitted a draft response in July 2026, which is contained in **Appendix 3**.

4.2 The TfSE response supports DfT's targeted intention which calls for intervention where otherwise uncommercial electricity network upgrades prevent a comprehensive charging network. However, the response notes that the consultation is heavily focused on cars and locations where market failure can already be demonstrated, and does not adequately address

- The short-term requirements of light commercial vehicles, HGVs and coaches or;
- The need to invest ahead of demand to provide sufficient network coverage to encourage confidence to invest in electric vehicles.

4.3 In terms of site selection and infrastructure planning, TfSE supports targeting locations where commercial delivery is not viable but recommends that decisions take account of strategic importance as well as current demand. This should include consideration of freight and coach movements, proximity to ports, airports and the Channel Tunnel, resilience of the wider charging network, planning constraints and the availability of alternative sites.

4.4 The TfSE response further calls for transparent and open access arrangements, clear performance and reliability standards, and time-limited capacity reservations to ensure publicly funded infrastructure is used efficiently. More broadly, TfSE emphasises the need to coordinate motorway service area investment with charging infrastructure at depots, distribution centres, truck stops, major A-roads and international gateways.

5. RIS3 Consultation

5.1 In the Summer, the DfT asked for views on the variations to the Road Investment Structure 3, known as RIS3. Although these road schemes were outside of the TfSE area, it was important to highlight concerns about the implications of cancelling advanced-stage schemes across the road network as a whole. The TfSE response is contained in **Appendix 4**.

5.2 TfSE recognises the need to identify savings within RIS3 but is concerned that the proposed £428 million reduction could undermine its long-term objectives. While supporting the overall direction of RIS3, TfSE believes funding decisions should prioritise resilience, connectivity, decarbonisation and sustainable growth. It is particularly concerned about the impact of reductions to scheme development, strategic studies and future pipeline activity, noting that cancelling advanced-stage schemes does not remove the underlying transport challenges they are intended to address.

5.3 TfSE supports prioritising maintenance and renewals funding to ensure the Strategic Road Network remains safe, reliable and resilient, particularly given ageing assets and climate change impacts. However, it stresses that this should not come at the expense of future scheme development and strategic planning.

5.4 Where funding reductions are required, TfSE believes priority should be given to safety, network resilience and long-term asset management, while continuing to support decarbonisation, connectivity and sustainable growth. It also highlights the importance of protecting funding for strategic planning, innovation and RIS4 pipeline development to support future investment decisions.

6. Letter of support for the Sussex and Brighton Strategic Authority's bid for Digital Twin funding.

6.1 The Sussex & Brighton Strategic Authority is bidding for Department for Transport funding to develop an A27/A259 Integrated Transport Growth Corridor Digital Twin, bringing together transport and other data to improve understanding of corridor performance and support future investment and growth. TfSE's response is contained in **Appendix 5**.

6.2 For TfSE, the project would provide a practical application of its existing Analytical Framework, data platform and modelling capability. It would strengthen the evidence available for investment planning, resilience and strategic decision-making, while demonstrating the value of TfSE's existing investment in regional analytical capability.

6.3 TfSE would support the project as a strategic partner, providing analytical expertise, regional evidence and support for the data architecture and platform underpinning the Digital Twin. This would principally build on existing TfSE capability, alongside an agreed level of officer and in-kind support.

6.4 If successful, the project would initially focus on the A27/A259 corridor, but could have wider value across the South East. TfSE would help capture and share the learning, exploring how the approach could be replicated elsewhere and used to support more consistent, evidence-led transport planning across the region.

7. Letters of Support for TfSE Constituent Authority bids to the Structures Fund

7.1 The government is providing grant funding to support the capital costs of repairing or replacing local highway structures through the Structures Fund. Local Highways Authorities had to submit proposals to the DfT by August 3, 2026. In July, TfSE reached out to our constituent authorities to offer support for any planned submissions.

7.2 In total, TfSE provided eleven letters of support to local authority bid submissions. For each of them, TfSE highlighted the linkages to the missions in our Transport Strategy, as well as the strategic importance of the schemes to the network in the South East. The following schemes received letters of support and these are available in full in **Appendix 6**:

- **Kent County Council** – A226 Galley Hill Permanent Reinstatement
- **Kent County Council** - A299 Whitstable to Ramsgate

- **Brighton & Hove City Council** - A259 King's Road Arch strengthening
- **Hampshire County Council** - A3023 Langstone Bridge, Hayling Island
- **Isle of Wight Council** - B3327 Newport Road (Lowtherville Graben)
- **Surrey County Council** - Bisley Bridge
- **West Sussex County Council** - Clympwick Bridge, A259 Littlehampton
- **Royal Borough of Windsor and Maidenhead** - Cookham Bridge
- **Hampshire County Council** - Mole Bridge
- **East Sussex County Council** - Rushey Hill
- **Bracknell Forest Council** - Station Roundabout (Highway Bridges)

7.3 Following submission, an announcement on funding awards is expected in Autumn 2026.

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 and note the letters of support submitted.

RUPERT CLUBB

Chief Officer

Transport for the South East

Contact Officer: James Boyes

Email: james.boyes@transportforthesoutheast.org.uk

Mass Transit Taskforce – Call for evidence – Draft TfSE Response

Draft TfSE response to each of the questions shown in italics.

Consultation response takes the form of an online questionnaire

[Mass Transit Taskforce call for evidence](#)

Deadline - Friday 31 August 2026

1. Introduction

The [Mass Transit Taskforce](#) call for evidence is seeking views on tackling the barriers to the quick and efficient delivery of mass transit systems across the UK.

For the purposes of the Taskforce, mass transit includes light rail, very light rail, tram, tram-train, metro-style systems, and bus rapid transit.

The call for evidence

The call for evidence is structured to gather evidence on each of the following themes:

- Understanding the benefits of mass transit
- Governance and accountability
- Skills, capabilities and capacity
- Policy development, strategic fit and options assessment
- Business case development, appraisal and approval
- Public and stakeholder consultation and engagement
- Funding, finance and sustainability
- Consenting procedures and securing legal powers
- Procurement
- Construction and commissioning
- Testing, trials and training prior to public opening
- Project handover and entering operation.

These themes have been designed to understand what challenges and opportunities there may be at each stage of a mass transit scheme, from inception to public operation.

For each theme, there are some suggestions of particular areas of interest that the Taskforce would like to explore to help guide responses, but should not be considered a comprehensive list.

2. Understanding the benefits of mass transit

A key objective of this Taskforce is to assess the wider economic, spatial and social benefits of mass transit systems, focusing particularly on its role in supporting economic growth, new jobs and housing, in line with Government priorities.

The Taskforce would particularly welcome evidence around:

- Quantifiable economic, spatial and social impacts and benefits of mass transit schemes.
- Focused, verifiable evidence around impact on economic growth, creating and enabling new jobs and unlocking delivery housing and other commercial and public development and regeneration.
- Evidence of where mass transit has led to inward investment.
- How benefits differ between different types of mass transit.
- Ambitions for future mass transit schemes and extensions.

We strongly suggest structuring your response around answering the following questions:

- What is your understanding of the economic, spatial and social benefits of mass transit systems? Please supply verifiable evidence to support your answer.
- Please share any examples of mass transit schemes (from the UK or elsewhere) where benefits have most effectively been realised, backed by verifiable evidence.
- Please share any examples of mass transit schemes where expected benefits have not been fully delivered and the reasons behind this. Please supply verifiable evidence to support your answer.
- **Local authorities only:** What plans do you have for new mass transit schemes or extensions and enhancements to existing schemes? What benefits are these schemes expected to deliver?

DRAFT TfSE Response

Understanding the benefits of mass transit

Transport for the South East (TfSE) welcomes the opportunity to contribute to the Mass Transit Taskforce's Call for Evidence. As the regional transport body for the South East, TfSE has recently reviewed the region's long-term transport challenges through its refreshed Transport Strategy and supporting Need for Intervention Report. This work identified a significant gap in the provision of mass transit across many of the South East's largest urban areas and concluded that improving mass transit should form an important part of the region's long-term transport strategy.

TfSE's evidence demonstrates a growing mismatch between the scale and economic importance of several South East conurbations and the quality of the public transport networks available to serve them. Many of the region's largest urban areas have populations and densities comparable with cities elsewhere in the UK that already benefit from light rail, metro or bus rapid transit systems, yet continue to rely primarily on conventional bus and suburban rail services. Figure 1.29 of the [Need for Intervention Report](#), compares the size and population density of major South East conurbations with those elsewhere in the UK.

It shows that South Hampshire, the Sussex Coast and Reading are comparable in scale with cities already served by mass transit systems across the UK. Yet these areas continue to rely largely on conventional bus services and suburban rail services which do not always provide the level of connectivity expected of urban areas of this size. This places these conurbations at a relative disadvantage in terms of accessibility, connectivity and future economic performance. The challenge for Government is therefore not simply how to expand existing mass transit systems, but how to enable places where the evidence now demonstrates that mass transit is needed to support sustainable growth.

Our evidence also demonstrates that there is no single solution appropriate for every urban area. The most suitable form of mass transit will depend on local geography, travel patterns, population density and development aspirations. The success of the Crawley Fastway network illustrates how bus rapid transit can provide many of the characteristics of mass transit while being well suited to medium-sized urban areas.

TfSE has not undertaken research into schemes where anticipated benefits have not been fully realised and therefore does not offer evidence on this aspect of the Call for Evidence.

While TfSE is not currently promoting individual mass transit schemes, our Transport Strategy identifies a clear role for mass transit in supporting the future growth of the South East's principal urban areas. We encourage the Taskforce to consider not only how existing systems can be expanded, but also how national policy, funding and delivery arrangements can better support those places where the evidence demonstrates a clear and compelling case for mass transit, but where delivery has yet to begin.

3. Governance and accountability

The Taskforce wants to understand barriers, delays and inefficiencies around governance and accountability and what would be helpful to set mass transit projects up for success, ensuring faster and more efficient delivery from end-to-end.

The Taskforce would particularly welcome evidence around:

- Extent of structured stakeholder engagement from the outset spanning government, industry, regulators, and communities to support alignment and reduce delivery risk.
- Are existing governance and accountability structures and mechanisms fit for purpose?
- Are financing and funding arrangements appropriate and appropriately governed?
- Extent and impact of fragmented responsibilities and accountability between central and local government and delivery partners.
- How should responsibilities and accountability be allocated? Would models with a clearer single point of accountability help?
- Where could decision making helpfully be devolved? How could existing or future devolution levers be shaped to maximise opportunities for streamlining and speeding up decision-making?

We strongly suggest structuring your response around answering the following questions:

- How are existing governance and accountability structures and mechanisms contributing to delays and inefficiencies in the delivery of mass transit schemes? Please supply verifiable evidence of impact.
- Are there examples (from the UK or elsewhere) where specific delays and inefficiencies relating to governance and accountability have been tackled? What lessons can be learned from these?
- What could be done to improve governance and accountability structures and mechanisms in to deliver mass transit schemes more quickly and efficiently?

Draft TfSE Response

Transport for the South East (TfSE) considers that effective governance is fundamental to the successful development of mass transit schemes. However, our experience suggests that the greatest governance challenge is not the management of individual

projects once they are underway, but establishing governance arrangements that remain effective over the long timescales required to develop major transport infrastructure.

The development of a new mass transit system is typically measured in decades rather than years. During that period, Governments, political administrations, funding programmes, appraisal guidance and organisational structures may all change. Local governance arrangements may also evolve, for example through devolution or the creation of Mayoral Strategic Authorities. While each of these changes may be justified in isolation, collectively they can require schemes to be revisited, refreshed or re-prioritised, increasing development costs and extending delivery timescales. From TfSE's perspective, one of the principal governance challenges is therefore maintaining sufficient institutional continuity to allow schemes to progress efficiently from concept through to delivery.

This challenge is particularly relevant in the South East, where many of the region's principal urban areas and travel to work markets extend across local authority boundaries. The successful development of long-term transport strategies and major infrastructure programmes often depends upon collaboration between local authorities, transport authorities, infrastructure providers and Government over many years. TfSE has seen this collaborative approach work successfully in areas such as the Solent and Berkshire, where authorities with different political leadership and local priorities have chosen to work together to develop shared evidence, agree common priorities and pursue transport investment that delivers wider benefits across the functional economic area. This demonstrates that effective governance is not solely about formal institutional structures. It is equally about creating the conditions for long-term collaboration, trust and shared ownership between partners. Stable governance arrangements are therefore essential if that collaboration is to be maintained despite changes in political leadership, funding programmes and organisational responsibilities.

TfSE does not consider that the solution is necessarily to create a single accountable organisation for every scheme. Many future mass transit corridors will continue to cross administrative boundaries and require multiple organisations to contribute their respective powers, responsibilities and funding. In these circumstances, the key issue is not the number of organisations involved, but whether there is a clear and enduring framework within which those organisations can work together, make decisions and maintain long-term commitment to a shared programme of investment.

As the regional transport body for the South East, TfSE helps provide this continuity through the development of a long-term regional transport strategy and shared evidence base. By working across local authority boundaries, TfSE helps establish a common understanding of future transport challenges and investment priorities that extends beyond individual political administrations or funding settlements. This reduces the

need to repeatedly revisit the strategic rationale for intervention as schemes mature and provides a stable foundation upon which future business cases can be developed.

The continued establishment of Mayoral Strategic Authorities provides an opportunity to strengthen local leadership for mass transit in some parts of England. However, many transport challenges and travel to work patterns extend beyond individual authority boundaries, regardless of local governance arrangements. Sub-national Transport Bodies therefore have an important and continuing role in bringing authorities together across wider functional geographies, maintaining a shared evidence base and providing continuity over the long development timescales associated with major transport investment. Effective governance should therefore be viewed as a partnership between national Government, local delivery authorities and Strategic Transport Bodies, each operating at the scale where they add greatest value.

TfSE has not undertaken research into the governance of individual mass transit projects and therefore does not comment on the relative merits of specific delivery models. However, our experience suggests that the most valuable contribution government can make is to provide greater institutional stability throughout the development lifecycle of major schemes. Consistent long-term policy direction, greater certainty over future funding programmes, proportionate changes to appraisal and governance requirements, and stable arrangements for collaboration between national, regional and local partners would reduce unnecessary delay and enable scheme promoters to focus on developing and delivering high-quality mass transit proposals.

4. Skills, capability and capacity

The Taskforce wants to understand what skills, capability and capacity need to be in place from the outset to set mass transit projects up for success.

The Taskforce would particularly welcome evidence around:

- Gaps in skills, capabilities and capacities within central and local government, the impact of these and how they could be addressed.
- Challenges for local government in the transition from strategic policy bodies to delivery bodies and what would help.
- Learnings from established delivery bodies and how these can be captured.

We strongly suggest structuring your response around answering the following questions:

- How are gaps in skills, capacities and capabilities across stakeholders contributing to delays and inefficiencies in the delivery of mass transit schemes? Please supply verifiable evidence of impact.
- Are there examples (from the UK or elsewhere) where specific delays and inefficiencies relating to gaps in skills, capacities and capabilities have been tackled? What lessons can be learned from these?
- What could be done to address gaps in skills, capacities and capabilities to deliver mass transit schemes more quickly and efficiently?

Draft TfSE Response

The principal challenge is not simply one of skills shortages, but of developing and sustaining the capability required to take major mass transit schemes from concept through to delivery.

Mass transit schemes require expertise across transport planning, engineering, business case development, commercial management, stakeholder engagement and programme delivery. Outside those areas with established mass transit programmes, opportunities to develop and retain this expertise are limited because schemes are promoted infrequently. As a result, many authorities have strong transport planning teams but relatively little direct experience of developing mass transit proposals.

This is particularly relevant in the South East, where several of the region's principal urban areas are now reaching the point at which mass transit should be considered. The relatively small number of schemes developed in recent decades means that opportunities to build and retain specialist expertise have been limited.

Major infrastructure schemes often take more than a decade to develop, during which staff change, organisations evolve and funding arrangements are revised. Maintaining capability therefore requires more than technical expertise. Without mechanisms to retain knowledge and maintain continuity, valuable experience can be lost, increasing the likelihood that work will need to be repeated and reducing the efficiency of scheme development.

Building and sustaining specialist capability also depends on confidence that there will be a continuing programme of work. Authorities are much more likely to invest in specialist teams where there is a stable pipeline of investment. Conversely, intermittent funding opportunities and uncertainty over future investment make it difficult to recruit, develop and retain experienced staff. Long-term policy and funding certainty are therefore as important to building capability as investment in training and professional development.

Sub-national Transport Bodies can help address this challenge by bringing authorities together, developing shared evidence, disseminating good practice and supporting

collaborative learning. Through its [Centre of Excellence](#) programme and wider programme of regional collaboration, TfSE already supports local authorities in developing common approaches to transport planning, evidence development and scheme delivery. Similar approaches could help build the capability required to develop future mass transit schemes by sharing specialist knowledge and experience across organisational boundaries.

Alongside funding individual schemes, there is value in investing in regional capability that can be shared across multiple authorities. Combined with a stable long-term pipeline of investment, this would help retain specialist expertise between projects, reduce duplication of effort and strengthen the capacity of the transport sector to develop and deliver mass transit schemes more efficiently.

5. Policy development, strategic fit and options assessment

The Taskforce wants to understand how effective processes are for aligning mass transit with wider strategic priorities and the wider transport network as well as how options are assessed.

The Taskforce would particularly welcome evidence around:

- Is there effective alignment of timescales, governance and outcomes with other plans and frameworks for the area (e.g. business cases for other major projects that may come forward at different times; spatial plans; and regeneration, housing and development priorities across multiple LTAs). How might alignment be strengthened?
- Is there good understanding of in what circumstances mass transit is an appropriate solution to meet desired outcomes, and specifically what type of mass transit? Do we give due consideration to options that could deliver the same or similar outcomes but quicker and cheaper?
- Are we good at estimating costs and benefits of preferred options?
- Is there scope to identify and adopt more effective prioritisation methodologies based on impact, deliverability and timing, ensuring focus on the most critical interventions?
- Network fit – are there barriers to ensuring effective integration with other modes?
- What changes might be needed in terms of operations and governance to better realise strategic and network fit of mass transit schemes?

We strongly suggest structuring your response around answering the following questions:

- How are challenges around ensuring strategic fit and assessing options contributing to delays and inefficiencies in the delivery of mass transit schemes? Please supply verifiable evidence of impact.
- Are there examples (from the UK or elsewhere) where specific delays and inefficiencies relating to ensuring strategic fit and assessing options have been tackled? What lessons can be learned from these?
- What could be done to address challenges in ensuring strategic fit and assessing options to deliver mass transit schemes more quickly and efficiently?

Maximum 1,000 words

Draft TfSE Response

Major mass transit schemes do not begin with engineering or option appraisal. They begin with agreement that a problem exists, that mass transit is the right type of intervention and that it supports wider ambitions for growth and development. Reaching that agreement through long-term transport planning before individual schemes enter development provides a much stronger foundation for subsequent business case development.

The South East provides a good example of this approach. TfSE's [Transport Strategy](#) and supporting Need for Intervention Report identify those urban areas where long-term population growth, employment density and planned development indicate that mass transit should now be considered. This strategic work establishes a shared evidence base across local authorities before individual schemes are promoted, reducing the need to revisit fundamental questions of need and strategic fit during scheme development.

The evidence also shows that transport cannot be considered in isolation. Decisions about future mass transit should be taken alongside housing, economic development and spatial planning so that investment supports wider place-making objectives rather than simply addressing existing transport problems.

This does not mean that every urban area requires the same solution. Strategic planning should identify the transport outcomes required, leaving option appraisal to determine the most appropriate intervention. In some places this may be Bus Rapid Transit, light rail or tram systems; elsewhere, improvements to conventional bus or rail services may provide a better solution. Maintaining an evidence-led and technology-neutral approach allows schemes to reflect local circumstances rather than promoting a single mode.

Sub-national Transport Bodies support this process by developing shared evidence, identifying cross-boundary priorities and helping neighbouring authorities work towards common objectives. Establishing this strategic context before schemes enter formal development provides greater confidence in the business case and allows subsequent appraisal to focus on selecting the most appropriate solution rather than repeatedly revisiting the case for intervention.

The greatest opportunity to improve the speed and efficiency of mass transit delivery therefore lies not in simplifying option appraisal, but in strengthening the strategic planning that precedes it.

6. Business case development, appraisal and approval

Mass transit projects typically follow three main business case development stages: producing a Strategic Outline Case, Outline Business Case and Full Business Case, each following a five case model setting out strategic, economic, commercial, financial and management dimensions of the case. At each stage, the business case is considered at an investment decision point, and some are additionally referred to HM Treasury for approval.

The Taskforce wants to understand what impact current processes for business case development, appraisal and approval are having on the speed and efficiency of mass transit scheme delivery.

The Taskforce would particularly welcome evidence around:

- Is Business Case development guidance fit for purpose, does it support the capture of wider benefits and strategic fit?
- Is the sequential business case process, underpinned by the five-case model, working? Could it be streamlined?
- Could approval mechanisms be streamlined?
- What level of appraisal would be fit for purpose?

We strongly suggest structuring your response around answering the following questions:

- How are challenges around business case development, appraisal and approval contributing to delays and inefficiencies in the delivery of mass transit schemes? Please supply verifiable evidence of impact.
- Are there examples (from the UK or elsewhere) where specific delays and inefficiencies relating to business case development, appraisal and approval have been tackled? What lessons can be learned from these?
- What could be done to address challenges around business case development, appraisal and approval to deliver mass transit schemes more quickly and efficiently?

Maximum 1,000 words

Draft TfSE Response

Strong business cases are built on work carried out well before the formal business case process begins. Agreeing the need for intervention, developing a shared evidence base and establishing long-term transport priorities at an early stage reduces the amount of work needed later and provides a clearer basis for investment decisions.

In the South East, this means identifying where mass transit is needed through long-term transport strategies and supporting evidence before individual schemes are promoted. This gives scheme promoters a clearer understanding of the problems they are trying to solve and how proposals support wider plans for housing, economic growth and spatial development. It also reduces the need to revisit the strategic case as schemes progress through successive stages of development.

TfSE's role is to help establish this strategic context through a shared regional evidence base and long-term transport strategy rather than to develop individual business cases. This provides local authorities with a common understanding of future transport challenges and investment priorities before detailed scheme development begins.

TfSE has not undertaken research into detailed business case preparation or appraisal methodologies and therefore does not comment on those processes. However, experience across the South East indicates that the greatest opportunity to improve business case development lies in strengthening the evidence and strategic planning that precede it, rather than making changes to the business case process itself.

7. Public and stakeholder consultation and engagement

- The Taskforce wants to understand the process for consulting and engaging the public and other stakeholders in shaping and gaining support for mass transit schemes and whether unnecessary delays and inefficiencies are impacting on mass transit scheme delivery.
- The Taskforce would particularly welcome evidence around:
- Are scheme promoters good at communicating the case to the public and wider stakeholders, securing their engagement and support?
- Is poor communication, consultation and engagement contributing to delays and inefficiencies?
- **We strongly suggest structuring your response around answering the following questions:**
- How are challenges around public and stakeholder consultation and engagement contributing to delays and inefficiencies in the delivery of mass transit schemes? Please supply verifiable evidence of impact.

- Are there examples (from the UK or elsewhere) where specific delays and inefficiencies relating to public and stakeholder consultation and engagement have been tackled? What lessons can be learned from these?
- What could be done to address challenges around public and stakeholder consultation and engagement to deliver mass transit schemes more quickly and efficiently?
- Maximum 1,000 words

TfSE Response

None - TfSE doesn't promote schemes or run consultations on schemes.

8. Funding, finance and sustainability

The Taskforce wants to understand the effectiveness of processes for securing funding for mass transit schemes from a range of sources as well as challenges around ensuring financial viability and sustainability.

The Taskforce would particularly welcome evidence around:

- The extent and impacts of stop-start funding, late-stage funding decisions, inflation (e.g. rescoping/descoping meaning full potential benefits are not delivered).
- How can greater funding certainty be achieved?
- How we can build market confidence to invest? E.g. maintaining a visible pipeline.
- Challenges around the risk appetite of funders, whether that be central/local government or private investors.
- Whether there are sufficient means to raise funding locally for schemes – what needs to be in place for this to happen?
- Is there a good understanding of whether a scheme will be operationally viable without requiring ongoing subsidy?

We strongly suggest structuring your response around answering the following questions:

- How are challenges around funding, finance and sustainability contributing to delays and inefficiencies in the delivery of mass transit schemes? Please supply verifiable evidence of impact.

- Are there examples (from the UK or elsewhere) where specific delays and inefficiencies relating to funding, finance and sustainability have been tackled? What lessons can be learned from these?
- What could be done to address challenges around funding, finance and sustainability to deliver mass transit schemes more quickly and efficiently?

Maximum 1,000 words

TfSE Response

Public funding for major transport infrastructure is constrained and mass transit schemes compete alongside many other investment priorities. The long development timescales associated with mass transit mean that changes to funding programmes and investment priorities during scheme development can create uncertainty, increase costs and make it more difficult to maintain momentum over the lifetime of a project. One of the greatest challenges for scheme promoters is the lack of long-term certainty over funding programmes during the extended period required to develop major schemes.

Major mass transit schemes typically require many years of development before construction can begin. During that time, changes to funding programmes, bidding processes and investment priorities can require schemes to be revisited, re-scoped or re-prioritised, increasing costs and extending delivery timescales. Uncertainty also makes it more difficult for authorities to retain specialist expertise, sustain partnerships and maintain momentum over the lifetime of a project.

Funding certainty is closely linked to governance and capability. Local transport authorities are more likely to invest in long-term partnerships, build specialist teams and undertake early-stage development work where there is confidence that a credible pathway to delivery exists. Conversely, short-term or intermittent funding can result in capability being lost between funding rounds, with work needing to be repeated as schemes re-enter development.

Providing greater long-term visibility of funding programmes and investment priorities would allow authorities to plan more effectively, develop realistic delivery pipelines and make more efficient use of public resources. While funding arrangements will inevitably differ between places and schemes, stable long-term funding expectations are likely to deliver greater benefits than repeated short-term competitions for individual projects. Greater certainty over future investment would improve efficiency throughout the development process and help build the institutional capability needed to deliver major mass transit schemes successfully.

9. Consenting procedures and securing legal powers

The Taskforce wants to understand the extent of delays and inefficiencies associated with securing the legal powers and consents to construct and operate mass transit systems.

The Taskforce would particularly welcome evidence around:

- Are Transport and Works Act Order (TWAO) processes fit for purpose to enable desired outcomes or are there alternative methods (noting government's commitment) to consult on reform of TWAO?
- TWAO applications need a funding statement to be submitted and component parts of funding deals 'locked in' – could more flexibility be introduced given confirming funding packages takes time?
- Multiple consents and approvals are required in addition to a TWAO – is this taking longer than necessary? What alternative approaches could be taken, is there scope for devolution?
- How efficient is the process for drafting, consulting on and finalising Environmental Impact Statements?
- Is the response to objections/objectors proportionate or disproportionate?
- What happens if Public Inquiries are needed? What impact do these have on project timescales and efficient delivery?
- Do challenges with securing consents and legal powers vary depending on the type of mass transit scheme (e.g. extensions vs new schemes, bus rapid transit vs light rail)?

We strongly suggest structuring your response around answering the following questions:

- How are challenges around consenting procedures and securing legal powers contributing to delays and inefficiencies in the delivery of mass transit schemes? Please supply verifiable evidence of impact.
- Are there examples (from the UK or elsewhere) where specific delays and inefficiencies relating to consenting procedures and securing legal powers have been tackled? What lessons can be learned from these?
- What could be done to address challenges around consenting procedures and securing legal powers to deliver mass transit schemes more quickly and efficiently?

Maximum 1,000 words

TfSE response

No response - TfSE has no direct experience of TWAO, Development Consent Orders or Public Inquiries.

10. Procurement

The Taskforce wants to understand processes and challenges around procuring design, construction and delivery partners to build infrastructure and supply vehicles.

The Taskforce would particularly welcome evidence around:

- How procurement costs can be reduced.
- How can we better understand and build supply chain capacity and workforce capability (including in the UK) to ensure readiness to support an expanded and sustained delivery pipeline?
- Opportunities for new technology and innovation (e.g. greater standardisation of design, materials, technologies and components, building a pipeline etc) to accelerate delivery and improve efficiency.
- Do procurement challenges vary depending on the type of mass transit scheme (e.g. light rail compared to bus rapid transit)?

We strongly suggest structuring your response around answering the following questions:

- How are challenges around procurement contributing to delays and inefficiencies in the delivery of mass transit schemes? Please supply verifiable evidence of impact.
- Are there examples (from the UK or elsewhere) where specific delays and inefficiencies relating to procurement have been tackled? What lessons can be learned from these?
- What could be done to address challenges around procurement to deliver mass transit schemes more quickly and efficiently?

Maximum 1,000 words

TfSE response

No response. TfSE does not procure scheme design and construction.

11. Construction and commissioning

The Taskforce wants to understand challenges once physical construction gets underway, including around traffic and disruption management, utilities works and diversions and physical integration with the wider network.

The Taskforce would particularly welcome evidence around:

- Why are our costs per mile so high?
- Are there technologies being used in the UK or elsewhere that could be exploited more effectively?
- What happens when mass transit interfaces with other parts of the network e.g. Network Rail infrastructure? Do existing processes add to delays and costs?
- Utilities diversion costs and cost sharing agreements – what is their true impact? Can the utilities process be improved?
- Do challenges vary depending on the type of mass transit scheme (e.g. extensions vs new schemes, bus rapid transit vs light rail)?

We strongly suggest structuring your response around answering the following questions:

- How are challenges around construction and commissioning contributing to delays and inefficiencies in the delivery of mass transit schemes? Please supply verifiable evidence of impact.
- Are there examples (from the UK or elsewhere) where specific delays and inefficiencies relating to construction and commissioning have been tackled? What lessons can be learned from these?
- What could be done to address challenges around construction and commissioning to deliver mass transit schemes more quickly and efficiently?

Maximum 1,000 words

TfSE response

No response – TfSE does not construct schemes.

12. Testing, trials and training prior to public opening

The Taskforce wants to understand processes around safety testing and trialling of tracks, electrical systems and vehicles prior to opening to the public, as well as training of drivers and other staff.

The Taskforce would particularly welcome evidence around:

- Whether systems and processes for testing and trialling systems, as well as training staff, prior to official public opening are fit for purpose.
- Is there scope for greater efficiency to speed up delivery?

We strongly suggest structuring your response around answering the following questions:

- How are challenges around testing, trials and training contributing to delays and inefficiencies in the delivery of mass transit schemes? Please supply verifiable evidence of impact.
- Are there examples (from the UK or elsewhere) where specific delays and inefficiencies relating to testing, trials and training have been tackled? What lessons can be learned from these?
- What could be done to address challenges around testing, trials and training to deliver mass transit schemes more quickly and efficiently?

Maximum 1,000 words

TfSE response

No response – TfSE does not construct schemes.

13. Project handover and entering operation

The Taskforce wants to understand processes for completing, signing off and handing over mass transit systems for public opening.

The Taskforce would particularly welcome evidence around:

- How can the process from completion to public opening and operational delivery be improved?
- How do we track outcomes and capture lessons learned from completed projects, ensuring continuous improvement in future scheme delivery?

We strongly suggest structuring your response around answering the following questions:

- How are challenges around project sign-off, handover and public opening contributing to delays and inefficiencies in the delivery of mass transit schemes? Please supply verifiable evidence of impact.
- Are there examples (from the UK or elsewhere) where specific delays and inefficiencies relating to project sign-off, handover and public opening have been tackled? What lessons can be learned from these?
- What could be done to address challenges around project sign-off, handover and public opening to deliver mass transit schemes more quickly and efficiently?

Maximum 1,000 words

TfSE response

No response – TfSE does not construct schemes.

14. Additional Evidence

Please use this space to supply any additional evidence of relevance to the Taskforce's objectives and goals which have not been covered elsewhere in your submission.

Maximum 1,000 words

TfSE Response

TfSE's evidence suggests that there is now a growing mismatch between the scale and economic importance of several South East conurbations and the quality of the mass transit networks available to serve them. While national investment has understandably focused on places with established mass transit systems, our work indicates that there is now an emerging group of urban areas where the case for higher quality public transport is becoming increasingly compelling.

Across the responses to this Call for Evidence, TfSE has identified three themes which we consider particularly important to the successful development of future mass transit schemes.

First, mass transit schemes require long-term institutional continuity. The development timescales associated with major transport schemes frequently exceed political administrations, funding programmes and organisational structures. Stable governance arrangements and a consistent long-term policy framework are therefore essential if schemes are to progress efficiently from concept through to delivery.

Secondly, authorities are more likely to invest in developing specialist skills and expertise where there is confidence in a long-term pipeline of investment. Stable funding expectations and a clear programme of future opportunities are therefore important not only for project delivery but also for developing and retaining the capability needed to support future schemes.

Thirdly, strong strategic planning reduces delays later in the development process. Establishing a robust evidence base, aligning transport with housing and economic development, and building consensus across administrative boundaries before schemes enter formal development provides a stronger foundation for subsequent business case development and appraisal.

TfSE welcomes the establishment of the Mass Transit Taskforce and encourages it to consider not only how existing systems can be expanded, but also how national policy, funding and delivery arrangements can support those areas where the evidence now demonstrates a clear and compelling case for mass transit, but where delivery has yet to begin.

{Ends}

Transport for the South East draft response to the Heathrow Expansion National Policy Statement consultation questions

July 2026

1. Introduction

- 1.1. Transport for the South East (TfSE) welcomes the opportunity to respond to the Department for Transport consultation on the proposed draft revision to the Airports National Policy Statement, which would be known as the Heathrow Expansion National Policy Statement (HENPS).
- 1.2. TfSE is the Sub-national Transport Body for the South East of England. Our Partnership Board brings together 16 constituent local transport authorities, district and borough authorities, protected landscapes, business representatives, National Highways, Network Rail and Transport for London. This enables TfSE to provide a strategic, evidence-led view of the transport needs of the South East and its connections to London, the rest of the UK and international gateways.
- 1.3. This response has been prepared with reference to the TfSE Transport Strategy 2025, Strategic Investment Plan 2026 and Rail Strategy 2026 and reflects the importance of sustainable growth, integrated and adequately funded surface access options for the expansion of Heathrow Airport. TfSE's comments focus on the issues with the greatest strategic transport implications for the TfSE area, particularly passenger and freight surface access, network capacity, resilience, decarbonisation and delivery.
- 1.4. This is a draft officer response that will be presented to the TfSE Partnership Board on 19 October 2026 for approval. Therefore, a further iteration may follow.

2. TfSE Responses to the Consultation Questions

Q1. To what extent do you agree or disagree with the assessment of the need for the proposed expansion of Heathrow Airport? Explain your answer.

TfSE response: Neither agree nor disagree.

TfSE recognises Heathrow's national and regional role as the UK's principal hub airport and a major international gateway for passengers, trade and high-value freight. TfSE's Transport Strategy supports improved strategic connectivity to

international gateways, while the SIP and Rail Strategy identify improved sustainable access to Heathrow as a regional priority.

However, TfSE's evidence base does not independently assess the aviation capacity case for a third runway, nor does it take a position on expansion in principle. Recognition of Heathrow's importance should therefore not be interpreted as agreement that the proposed Northwest Runway is the only or preferred means of meeting future aviation demand.

If expansion proceeds, the assessment of need must be considered alongside the wider transport network's ability to accommodate additional demand. Expansion and its construction would generate substantial passenger, staff, servicing, freight and construction movements. The improvements to transport infrastructure, and the works needed to deliver them, would place further pressure on networks that are already at or over practical capacity at busy times, including the M25 and connecting corridors, the South West Main Line, the Great Western Main Line, the Reading area, and Woking.

The final HENPS should therefore require a cumulative and network-wide assessment across the wider South East. Each phase of airport growth should be conditional on the necessary passenger and freight infrastructure, services, and mitigation measures being funded, consented, and operational.

Q2: The government has proposed four tests which must be met for expansion to proceed. To what extent do you agree or disagree with how the government has set each of the 'four tests'? Explain your answer for each test:

- **Air quality**
- **Noise**
- **Climate change mitigation**
- **Economic growth across the country**

Air quality

TfSE response: Partly agree.

TfSE agrees that expansion should not delay compliance with legal air-quality obligations or cause a new breach. It is also appropriate that the test covers airport operations, construction and surface access.

Legal compliance should, however, be treated as the minimum requirement. The assessment must address the cumulative effects of additional passenger, staff, freight, servicing and construction traffic beyond the airport boundary, including impacts on strategic and local routes in the surrounding TfSE area. Assumptions

about future improvements in vehicle emissions should be supported by clear evidence about their timing and deliverability.

Binding thresholds, independent monitoring and predefined corrective action should support the test. Measures should include reducing private car trips, increasing public transport use, consolidating and retiming road freight operations, moving more freight and construction materials by rail, and accelerating the adoption of zero-emission vehicles. Further airport growth should not proceed where the relevant air-quality outcomes are not being achieved.

TfSE's responses to each of the four tests are set out below.

Noise

TfSE response: Neither agree nor disagree

TfSE agrees that noise must be a principal test and that it supports a clear, measurable and enforceable framework. However, it is not clear from the policy statement whether the applicant will be required to commission a specialist aviation noise assessment to determine whether the detailed test, noise envelope, and operational arrangements have been set at the appropriate level. If not, this should be included in the noise test requirements.

The final HENPS should require transparent, independently verified monitoring and consider the frequency, duration, and timing of exposure, not only the average noise level. It should address construction, aircraft operations, and surface access noise, including effects on newly affected communities, night noise, and the provision of clearly scheduled times when there is no aircraft noise. Mitigation should be delivered before any impacts occur, with clear consequences if the permitted noise limits are exceeded.

Climate change mitigation

TfSE response: Partly agree

TfSE supports the inclusion of climate change mitigation as a fundamental test. The proposed requirements for consistency with carbon budgets, assessment of aviation and surface access emissions, and whole-life carbon are broadly aligned with TfSE's Decarbonisation Mission and the Avoid, Shift, Improve approach.

The test should be strengthened through binding interim milestones for surface access. Cleaner vehicles and future aviation technology should not replace measures to avoid unnecessary road trips and shift passengers, staff and freight to lower-carbon modes. The HENPS should require the applicant to maximise the proportion of suitable airport freight, aggregates, construction materials, and waste

transported by rail rather than by road, with measurable targets and a clear delivery plan.

The assessment should include the embodied and operational carbon arising from consequential transport infrastructure improvements. It should also consider whether grid capacity and resilience can support airport electrification without constraining the decarbonisation needs of surrounding communities, transport operators and businesses. Airport growth should not proceed beyond defined phases unless the associated carbon, public transport, and freight mode-shift measures have been delivered and are performing as required.

Economic growth across the country

TfSE response: Partly agree.

TfSE recognises the potential for Heathrow expansion to support economic growth. This is consistent with TfSE's Sustainable Growth Mission, which seeks to use transport improvements to unlock investment, enable sustainable growth and create well-connected communities.

However, the assessment should demonstrate the extent to which the economic benefits would represent genuinely additional growth for the UK. It should distinguish this from activity that may be shifted from other airports or regions to Heathrow, such as passengers, air services, freight, investment or employment. It should also account for the economic costs of congestion, unreliable journeys, construction disruption, pressure on existing road and rail capacity, displacement of passenger and freight services, environmental and health effects, and the risk of constraining planned housing and employment growth elsewhere.

The test should assess net benefits after the full cost of necessary surface access and consequential network improvements. It should also show how communities and businesses across the wider South East and the rest of the country would gain access to appropriate sustainable public transport for employment, skills, and supply chain opportunities.

Q3. To what extent do you agree or disagree that the proposed mitigation measures for environmental impacts are deliverable, effective and proportionate? Explain your answer.

TfSE response: Neither agree nor disagree.

The draft HENPS identifies a wide range of potentially appropriate mitigation measures. However, the strategic supporting assessments acknowledge that detailed scheme design, project-level evidence and mitigation are not yet available in several areas. TfSE is therefore not in a position to conclude that the overall package will be deliverable and effective.

The Development Consent Order application should include a costed and programmed mitigation and delivery plan. This should identify the measures required for each phase, responsible organisations, committed funding, consents, dependencies, delivery dates, contingency arrangements and enforcement mechanisms.

Mitigation should be delivered before or in step with the activity that generates the impact. It should be assessed cumulatively across the wider South East, particularly with respect to road congestion, rail capacity, freight, construction traffic, carbon emissions, and air quality. Where agreed thresholds are not met, predefined corrective action should be applied, and further growth should not proceed until compliance is restored.

Q7. Do you agree or disagree that the proposed ban on scheduled night flights should be defined by the time a plane takes off or lands rather than departure from and arrival at the terminal? Explain your answer.

TfSE response: Agree.

TfSE agrees that the ban should be defined by the time an aircraft takes off or lands. This would directly link the restriction to the primary source of aircraft noise experienced by communities beyond the airport boundary and provide greater certainty that aircraft will not fly over those communities during the protected night-time period.

Defining the ban by departure from or arrival at the terminal could allow an aircraft to take off or land during the protected period due to the time spent taxiing between the runway and the terminal.

Noise from taxiing and other ground operations can also affect communities close to the airport. These impacts should be controlled separately through enforceable operational measures and the wider noise envelope. The HENPS should also explain how delayed flights and exemptions would be managed, monitored and enforced.

Q8. To what extent do you agree or disagree with designating Heathrow expansion as Critical National Growth Infrastructure? Explain your answer.

TfSE response: Neither agree nor disagree.

TfSE recognises Heathrow's national importance as an international passenger and freight gateway. However, TfSE's strategies do not establish a position on the legal designation of Heathrow expansion as Critical National Growth Infrastructure.

If the designation is retained, it should not weaken the assessment of transport capacity, environmental effects, health, equality or community impacts. Critical status should entail stronger delivery obligations and policy support. The four tests must be demonstrably satisfied, essential passenger and freight infrastructure

must be funded and deliverable, and cumulative impacts on the wider road and rail networks must be fully assessed.

Q9. To what extent do you agree or disagree that the compensation for affected residents is fair? Explain your answer.

TfSE response: Neither agree nor disagree.

TfSE welcomes the proposed compensation above unblighted market value, together with the provision of noise insulation and community compensation. The fairness of the package will depend on whether it fully reflects the impacts experienced by affected residents, including property acquisition, noise and construction disruption. The eligibility criteria, valuation arrangements and process for accessing compensation should therefore be clear, consistent and independently reviewable.

Compensation should not replace the requirement to avoid and mitigate impacts, or to ensure that affected residents are not financially disadvantaged by delay or uncertainty. Compensation and mitigation should be secured through enforceable Development Consent Order requirements and remain funded for the duration of the impacts.

Q10. To what extent do you agree or disagree with the surface access requirements, passenger mode-share targets and Surface Access Vision? Please provide any further comments.

TfSE response: Partly agree.

TfSE supports the inclusion of binding public transport mode-share targets and the principle that public transport should be the first choice for journeys to an expanded Heathrow. However, the information presented does not provide sufficient evidence for TfSE to determine whether the proposed targets of 50 per cent at 116 million terminal passengers and 55 per cent at 130 million terminal passengers are appropriate, sufficiently ambitious or achievable.

The applicant should be required to demonstrate how the targets have been calculated, the additional public transport passenger journeys they would generate, and whether these can be accommodated without adversely affecting existing passenger and freight services. This assessment should identify the additional infrastructure, services and network capacity required to achieve the targets, together with the associated funding and delivery arrangements.

The targets should be treated as minimum requirements and should be reviewed as the expansion is developed. More ambitious targets should be applied where evidence shows they are achievable and necessary to manage congestion, carbon emissions, and air-quality impacts.

However, it should be noted that airport-wide targets could conceal poor performance in particular locations or travel markets. Separate targets and monitoring for passenger and employee travel, geographic origin, time of day and individual public transport modes should therefore support them.

TfSE supports the proposed minimum passenger public transport mode-share targets of 50 per cent at 116 million terminal passengers and 55 per cent at 130 million terminal passengers. These should be minimum standards rather than ceilings or substitutes for delivering additional capacity. Stretch targets should be set where supported by evidence.

Airport-wide averages could conceal poor outcomes in particular markets. Targets should be disaggregated by passenger and employee travel, geographic origin, time of day and mode. Separate reporting should cover all public transport modes, private car, taxi and private hire vehicles, and active travel.

The applicant must demonstrate that the targets can be accommodated by available network capacity, including train paths, rolling stock, stations and interchanges, bus and coach facilities, highway priority, and early, late and overnight services. It must identify where airport demand requires additional capacity and how that capacity will be delivered without worsening conditions for existing users or displacing planned improvements elsewhere.

The final HENPS should explicitly recognise Southern and Western Rail Access to Heathrow as strategically important components of the surface access response. The promoter should make an appropriate and substantial contribution to their development and delivery, including enabling and consequential network works. Express buses, coaches, rapid transit buses, and mass transit will also be essential for markets without direct rail access.

Surface access must address freight and construction traffic as well as passenger travel. There should be a much stronger emphasis on moving suitable airport freight, aggregates, construction materials and waste by rail rather than road. The applicant should fund the railheads, terminal, gauge, junction, signalling and capacity works required to do this without displacing existing passenger or freight services.

Each phase of expansion should pass an enforceable surface access gateway test. The relevant passenger and freight infrastructure, services, and mitigation measures should be funded, consented, and operational before the corresponding airport capacity is released.

Q11. To what extent do you agree or disagree that the Making Best Use policy should be updated? What should be considered?

TfSE response: Agree.

The Making Best Use policy should be updated to reflect changes in aviation demand, climate obligations, airport proposals and surface transport policy since 2018. An update would provide an opportunity to establish a more consistent approach to sustainable surface access and the cumulative implications of airport growth.

The update should:

- *assess the combined passenger, staff, freight and construction demand arising from growth at more than one airport;*
- *consider cumulative impacts on road and rail networks across local and regional boundaries;*
- *require growth to be matched by funded and deliverable public transport, freight and active travel measures;*
- *align airport growth with carbon budgets and surface transport decarbonisation;*
- *protect existing passenger and freight services and planned regional improvements;*
- *require promoters to fund necessary mitigation and consequential network works; and*
- *give Sub-national Transport Bodies a formal role in assessing strategic and cross-boundary impacts.*

An updated policy should provide a consistent assessment framework without predetermining individual airport proposals.

Q12. To what extent do you agree or disagree that the draft HENPS provides an effective framework for decision making on development consent applications? Explain your answer.

TfSE response: Partly disagree.

The draft HENPS provides a comprehensive structure and addresses the principal topics relevant to a Development Consent Order application. However, it gives substantial policy weight to the need for expansion and to the proposed Critical National Growth Infrastructure designation, while leaving important questions about the funding and delivery of essential surface access and mitigation for the future application.

The final HENPS should establish clearer minimum evidence and delivery requirements. It should require a cumulative assessment of wider road and rail impacts, costed passenger and freight surface access plans, clear promoter funding responsibilities, and enforceable gateways linking each phase of growth to infrastructure and mitigation measures.

It should also protect existing passenger and freight services, recognise the strategic role of Southern and Western Rail Access, and secure formal participation by affected local, unitary and mayoral combined authorities (where applicable),

Sub-national Transport Bodies and infrastructure managers. Essential measures should not be deferred until after development consent has been granted.

Q13. Do you have any comments on the additional supporting documents, including the AoS, HRA, EqIA and HIA?

TfSE notes that the Appraisal of Sustainability identifies significant economic benefits at local level but uncertainty about the extent to which national economic effects would be additional. It also identifies potentially significant adverse effects across several environmental topics. The Habitats Regulations Assessment does not rule out adverse effects at this stage, as detailed design and mitigation measures are not yet available.

These conclusions reinforce the need for clear project-level evidence requirements and decision thresholds. The supporting assessments should give particular attention to cumulative passenger, staff, freight and construction demand; impacts extending beyond the immediate airport area; capacity constraints on the wider road and rail networks; accessibility and affordability for lower-paid and shift workers; and whether mitigation is funded and deliverable before impacts arise.

The assessments should be reviewed where the scheme, phasing, surface access assumptions or relevant national policy changes materially change before the Development Consent Order application is submitted.

Q14. Does the draft HENPS take due regard of its legal obligations under the Public Sector Equality Duty? Explain your answer.

TfSE response: TfSE is not in a position to provide an opinion on compliance.

TfSE supports the preparation of an Equality Impact Assessment and the HENPS requirements relating to accessibility, inclusive design, engagement and assessment of differential and disproportionate impacts.

The final HENPS should require the applicant to demonstrate how equality evidence has influenced scheme design and delivery. Particular attention should be given to disabled passengers and staff, people with mobility, sensory or cognitive impairments, lower-income households, shift workers, older and younger people, people without access to a car, and communities affected by severance, relocation, noise or air pollution.

Accessible transport must also be affordable and available when people need to travel. Equality monitoring should continue through construction and operation, with affected groups and relevant authorities involved in its design and review.

Q15. What additional comments do you have on the draft HENPS?

TfSE proposes the following amendments to the final HENPS so that it:

- explicitly recognises Southern and Western Rail Access to Heathrow and complementary bus, coach and mass transit as strategic components of passenger surface access;
- requires each phase of growth to be matched by funded, consented and operational passenger and freight infrastructure, services and mitigation;
- assesses cumulative pressure on road and rail networks across a wider area of the South East, encompassing the TfSE area, London and adjoining regions whose transport networks and services could be affected by additional passenger, freight and construction movements, including through competition for train paths, road space and investment
- makes the promoter responsible for the full reasonable cost of mitigation and the airport-related share of enabling and consequential network works;
- requires the applicant to maximise the movement of suitable airport-related freight, aggregates, construction materials and waste by rail rather than road, supported by measurable targets and funded plans for the necessary rail facilities and network capacity;
- protects existing passenger and freight services and prevents airport growth from displacing planned improvements elsewhere;
- requires separate and enforceable targets for passenger, staff, freight and construction travel through an Environmentally Managed Growth framework. The freight targets should cover the movement of suitable freight and construction materials by rail, the use of consolidation centres, reductions in peak-time road freight movements and the transition to zero-emission HGVs;
- secures affordable, accessible and integrated public transport throughout airport operating and shift-working hours; and
- provides TfSE and other relevant Sub-national Transport Bodies with a formal advisory role in the development and review of the Surface Access Strategy, including assessing cross-boundary and cumulative impacts and alignment with regional transport priorities. Local authorities and emerging strategic authorities should have roles that reflect their responsibilities for planning, transport and infrastructure.

TfSE would welcome continued engagement with the Department for Transport, Heathrow Airport Limited, affected authorities and delivery partners as the HENPS and any subsequent Development Consent Order proposals are developed.

Draft TfSE response to the DfT's Strategic Charging Infrastructure Scheme consultation

1. Introduction

- 1.1. Transport for the South East (TfSE) welcomes the opportunity to respond to the Department for Transport's (DfT's) Strategic Charging Infrastructure Scheme. This is a draft officer response and may be updated following consideration through TfSE governance.
- 1.2. TfSE is the sub-national transport body for the South East of England. Our Partnership Board brings together our 16 constituent local transport authorities and representatives of local government, protected landscapes, business and national transport bodies.
- 1.3. Our Transport Strategy (published in October 2025) sets a vision for sustainable, net-zero carbon growth to 2050 through five missions: strategic connectivity, resilience, inclusion and integration, decarbonisation, and sustainable growth. Our Strategic Investment Plan (published in March 2026) provides the framework for delivery.
- 1.4. The consultation is seeking views on the design of the proposed Strategic Charging Infrastructure Scheme. The scheme would address the high cost of securing additional electricity network capacity at selected motorway service areas in England. At some sites, these costs are considered too high for the private sector to fund commercially, creating a risk that the motorway charging network will not expand quickly enough to support the transition to electric vehicles. Key questions include:
 - how sites should be selected,
 - how much capacity should be provided,
 - what infrastructure should be eligible for support, and
 - the terms under which charging providers should be able to access the publicly supported capacity.
- 1.5. This response draws on TfSE's combined regional evidence base, including our adopted transport, freight and charging strategies; technical and analytical work; engagement with local authorities and the freight sector; and previous

consultation evidence. Taken together, this identifies grid capacity, connection cost, land, planning and suitable public charging as barriers to commercial-vehicle decarbonisation. It also shows that strategic public charging is necessary even where much fleet charging takes place at depots.

2. TfSE's overall position

2.1 TfSE supports DfT's targeted intention, which calls for intervention where otherwise uncommercial electricity network upgrades prevent a comprehensive charging network. However, the consultation is too focused on cars and locations where market failure can already be demonstrated. Therefore, it does not adequately address:

- the short-term requirements of light commercial vehicles (LCVs), HGVs and coaches and their different duty cycles, concentrated charging windows, higher power demand and greater space requirements that could materially change the capacity required at strategic sites, or
- the need to invest ahead of demand where this is necessary to provide sufficient network coverage to give freight operators confidence to invest in electric vehicles;

Therefore, the scheme should plan for mixed passenger and commercial-vehicle use from the outset.

3. TfSE response on scheme scope and site selection

3.1 The proposed purpose and scope of the Strategic Charging Infrastructure Scheme

The scheme would address high electricity network upgrade costs at a limited number of existing motorway service areas in England. The scheme intends to fund eligible network works where the market cannot do so commercially, enabling open-access ultra-rapid charging.

TfSE response: *TfSE supports this in principle. However, the scope should explicitly include the expected demand from LCVs, HGVs and coaches, not only cars. This aligns with TfSE's Decarbonisation Mission, which supports charging private and freight vehicles, and its Resilience Mission, which seeks sufficient*

and reliable power capacity. A motorway-only first phase is understandable, but the DfT should explain how it will address related constraints on major A-roads and at freight-critical locations.

3.2 The proposed eligibility requirements for motorway service areas

Support would be limited to existing motorway service areas where forecast charging demand exceeds available capacity, and the cost of the necessary connection is not commercially viable.

TfSE response: *Broadly, TfSE agrees, provided support is additional and does not replace viable private investment. Eligibility should also consider the site's strategic function, distance to reliable alternatives, connection lead time, physical deliverability and ability to accommodate commercial vehicles. A site with moderate current car use may still be important for network coverage, resilience or access to an international gateway.*

3.3 The criteria the government should use to select and prioritise eligible sites

The scheme proposes to select a subset of eligible sites, reflecting the funding available and the need to strengthen the motorway charging network.

TfSE response: *Criteria for site eligibility should include strategic freight and coach flows, proximity to ports, airports, the Channel Tunnel (where applicable), an assessment of neighbouring sites being unavailable, and planning and land constraints. Current car charger utilisation should not be the main criterion because it could favour established sites while overlooking strategic gaps.*

4. TfSE response to proposals to assess network capacity, access and value for money

4.1 The suitability of the proposed approach to forecasting electricity demand

Connections should be delivered by 2030 and sized to meet forecast EV charging demand to at least 2035, and potentially towards 2050 where appropriate.

TfSE response: *Connections delivered by 2030 should include forecast demand for wider categories of vehicle, not just cars. Cars, LCVs, HGVs and coaches should also be modelled separately to at least 2035, including high-uptake and peak-power scenarios. LCV fleets may create concentrated demand, while HGVs may need very high-power charging during fixed operational or driver-rest windows. Forecasts should distinguish depot, destination and public charging, while recognising that reliable public charging remains essential to operator confidence. A car-led forecast could materially understate connection requirements and lead to costly repeat upgrades.*

4.2 The proposed approach to the amount and type of network capacity

The Scheme proposes funding the energy supply extension assets needed to connect selected sites, such as substations, trunking and cabling. Wider network reinforcement would remain the responsibility of the relevant electricity network bodies.

TfSE response: *While TfSE agrees with this proposal, future-proofing must cover both electrical and physical infrastructure. However, the government should safeguard sufficient electricity capacity, land and access for future LCV and HGV charging at strategically important freight sites and identify how this provision could be expanded as demand develops. Capacity should not be committed entirely to car charging before commercial-vehicle demand matures. Site design should integrate charging with lorry parking and driver welfare rather than attempt to retrofit these requirements later.*

4.3 The proposed arrangements for businesses to access subsidised capacity?

The consultation proposes that the government contracts with connection providers to strengthen the network. Charging businesses would then enter their own connection agreements and access the government-supported capacity at a subsidised, commercially viable second-comer charge. A second-tier charge is normally paid by a later user that benefits from network assets funded by an earlier party.

TfSE response: *TfSE supports fair, open and non-discriminatory access. Charges, eligibility and allocation decisions should be transparent, with access*

by more than one charge point operator where practical. Agreements should require open public access, reliability, interoperability, accessible provision and clear pricing.

4.4 The proposed arrangements for reserving capacity

The consultation sets out that the government would reserve the strengthened capacity for EV charging for a fixed period, giving charging providers time to apply for and develop connections.

TfSE response: *Reservation is sensible, but it should not allow scarce capacity to remain unused. Reservations should be time-limited and linked to planning, procurement, construction and commissioning milestones. Any unused capacity should be reallocated, with flexibility for delays outside an operator's control.*

4.5 Proposals on how the scheme should secure value for money and protect public investment

The scheme is intended to address genuine market failure while enabling private investment in charge points and on-site infrastructure. Government is considering contractual protections and the price at which supported capacity should be made available.

TfSE response: *Government investment should be directed towards creating a comprehensive strategic charging network that supports the transition of cars, LCVs, HGVs and coaches. Funding should not be restricted only to locations where current demand demonstrates that the market cannot deliver. It should support infrastructure ahead of demand where this is necessary to give freight operators confidence to invest in electric vehicles and to provide adequate coverage across the strategic road network. Public funding should complement private investment and be subject to clear requirements for timely delivery, public access and reliable operation.*

5. TfSE response to the scheme proposals for delivery, governance and wider considerations

5.1 The scheme's proposals for delivery, governance and monitoring arrangements

The scheme would require coordination between government, its delivery body, connection providers, motorway service area operators and charging providers.

TfSE response: *Roles should also include National Highways, electricity network bodies, local planning and highway authorities. TfSE is also undertaking a Freight Fuels Infrastructure Study. This study will examine what infrastructure may be required, where it may be needed, and the implications for energy supply, land use and infrastructure planning. It will strengthen the evidence base for infrastructure planning, and improve the practical support available to local authorities, operators and other stakeholders across the South East. It will draw on relevant national evidence and existing studies, zero-emission freight infrastructure and energy supply resilience. The output of the study will be a strategy that sets out how freight vehicle charging and refuelling infrastructure will need to evolve between now and 2050, including what will be needed at motorway service areas in the TFSE area. We will share the results with DfT and the Department for Energy Security and Net Zero to inform their planning decisions on this and other future schemes.*

A forward programme of candidate sites would allow alignment with transport, freight, planning and energy strategies. Monitoring should distinguish electricity capacity enabled from chargers actually operating and report separately on provision and utilisation for cars, LCVs, HGVs and coaches. This is necessary to determine whether the scheme is addressing the commercial-vehicle gap identified by TfSE.

5.2 Other comments on the proposed scheme

TfSE response: *The initial scheme is focused on existing motorway service areas. Motorway service areas are only part of the network required by LCVs, HGVs and coaches. Government should explain how the scheme will complement depot and destination charging, and provision at major A-roads, truck stops, distribution centres, ports, airports and the Channel Tunnel. This is*

particularly important in the South East, where nationally significant freight corridors connect international gateways with London, the Midlands and the rest of the UK. TfSE would welcome continued engagement on the identification of strategic gaps and commercially constrained locations.

6. Summary of TfSE response

TfSE supports the scheme, but its final design must properly account for the near-term growth of electric LCVs and HGVs. The present car-led emphasis risks underestimating power, land and operational requirements. Vehicle-specific forecasts would safeguard commercial-vehicle capacity, and early regional coordination would reduce the risk of repeat upgrades.

TfSE also recommends that the proposal should:

- give greater consideration to the future charging requirements of LCVs, HGVs and coaches;
- use separate demand forecasts for cars, LCVs, HGVs and coaches, reflecting their different operational, spatial and power requirements;
- consider strategic freight corridors, international gateways and gaps in network coverage when selecting sites;
- safeguard sufficient electricity capacity, land and suitable access for future LCV and HGV charging at strategically important freight sites;
- identify how commercial-vehicle charging provision can be expanded as demand develops;
- ensure that capacity and land are not committed entirely to car charging before commercial-vehicle demand matures;
- support modular expansion to reduce the risk of further costly electricity network upgrades;
- invest ahead of demand to provide sufficient network coverage and give freight operators confidence to invest in electric vehicles rather than focus on locations where the DfT considers market failure can be demonstrated;
- ensure that public funding complements private investment and is linked to clear requirements for timely delivery, public access and reliable operation;
- coordinate motorway service area investment with charging at depots, destinations, major A-roads, truck stops and international gateways; and

- involve sub-national transport bodies and local authorities in identifying strategic gaps and coordinating delivery.

RIS3 Variation Consultation – Transport for the South East Response

Do you support or oppose the changes to RIS3 outlined above, including the overall £428 million reduction proposed and the specific areas for savings proposed to achieve it?

Please let us know the reasons for your response and any other comments you have on the proposal or any alternatives.

Oppose:

Transport for the South East (TfSE) is the Sub-national Transport Body for the South East of England, bringing together local transport authorities, district and borough councils, business representatives and national delivery partners to provide a unified voice on strategic transport investment across the region.

TfSE have a vision led [Transport Strategy](#) in place to influence government decisions about where, when and how to invest in our region to 2050. The strategy sets out five missions to deliver our vision: Strategic Connectivity, Resilience, Inclusion and Integration, Decarbonisation and Sustainable Growth. Our [Strategic Investment Plan](#) (SIP) provides a framework for delivering our Transport Strategy, setting out transport infrastructure and policy interventions needed across the region over the coming decades.

TfSE officers have been engaged with DfT and National Highways as the RIS3 development process has taken place. The Vision and Objectives outlined in RIS3 are supported and align strongly with the Missions set out in our own Transport Strategy and Strategic Investment Plan (SIP), particularly those around sustainable development and resilience of the transport network.

TfSE recognises the challenging fiscal context in which Government is reviewing RIS3 funding and the need to identify savings. However, we are concerned about the potential impacts of the proposed £428 million reduction on the delivery of RIS3 objectives and future strategic transport planning and consider that any RIS3 variation should be assessed against long-term strategic outcomes, including resilience, decarbonisation, connectivity and sustainable growth, rather than solely against short-term financial savings.

Whilst the proposed cancellation of the A38 Derby Junctions and A46 Newark Bypass schemes is outside the TfSE region, we are concerned about the broader implications of cancelling advanced-stage schemes and reducing investment in future pipeline development. The removal of a scheme from RIS3 does not remove the underlying transport problem that the scheme was intended to address. The cancellation of M27/A27 schemes within our geography illustrates this point. The operational, safety, capacity and connectivity challenges that gave rise to the proposal will remain and, in many cases, are likely to worsen over time as demand grows and network pressures increase.

If a particular intervention is no longer considered deliverable, affordable or value for money, an alternative strategy should be identified and progressed to ensure that the original transport need is still addressed. Without a replacement solution, the impacts on network users, local communities and economic growth are likely to persist, potentially leading to greater costs and more complex challenges in the future.

In addition, there is a strong case for continuing the development of schemes even where construction funding is not currently available. Maintaining progress through development helps ensure that schemes are sufficiently mature and evidence-based when future funding opportunities arise. A pipeline of well-developed, deliverable projects enables government and delivery bodies to respond quickly to emerging investment opportunities, reducing delays between funding decisions and implementation. Pausing development entirely can result in the loss of technical knowledge, the need to revisit earlier work, and increased costs and timescales when priorities inevitably return. TfSE is particularly concerned about any reductions to strategic studies, future route strategies, RIS4 pipeline development and business case preparation activities. These functions are critical to ensuring that future investment decisions are evidence-led and that interventions can be delivered efficiently when funding becomes available.

TfSE also remains concerned that a number of Strategic Road Network challenges identified through our evidence base and Strategic Investment Plan currently lack a clear pathway to delivery within RIS3. Although several previous schemes were cancelled by the Government, the evidence base behind our strategy demonstrates that the need for intervention is no less diminished, and our SIP continues to identify several schemes on the SRN that are required.

TfSE officers will continue to meet with both DfT and National Highways as the RIS process continues, to ensure the regions needs and priorities are taken into consideration.

Do you agree or disagree with the prioritisation of capital funding for maintenance and renewals? And why

With the current budget pressures identified in the last spending review TfSE agrees with the prioritisation of capital funding for maintenance and renewals.

There is a clear and important need to prioritise investment in the maintenance and renewal of existing transport infrastructure to ensure the network remains safe, reliable and resilient. This is particularly relevant in the context of ageing assets, increasing maintenance liabilities and the growing impacts of climate change, which require infrastructure to be adapted and protected against more frequent and severe weather events.

Effective maintenance and renewal programmes help safeguard previous investment, reduce the risk of asset failure and support the continued operation of the network for users and communities. This reflects TfSE's strategic focus on maintaining a resilient and reliable transport network.

At the same time, it is important that a focus on maintaining existing assets does not come at the expense of developing a pipeline of future improvement schemes. Many of the challenges relating to capacity, connectivity, safety and economic growth will require targeted interventions and enhancements beyond routine maintenance.

TfSE therefore considers that maintenance funding should be balanced with continued support for future scheme development and strategic planning activities.

Funding reductions should therefore seek to minimise impacts on resilience, decarbonisation and future network planning programmes.

Do you have any views on how the RIS3 objectives may be prioritised in any capital funding reductions?

The six RIS3 strategic objectives are:

- Grow the economy
- Improve safety for all
- A level of network performance that meets customer needs



0300 3309474

tfse@eastsussex.gov.uk

transportforthesoutheast.org.uk

Transport for the South East, County Hall,
St. Anne's Crescent, Lewes, BN7 1UE

- A technology enabled and enabling network
- A resilient network that is planned and managed for the long-term
- Deliver improved environmental outcomes

If capital funding reductions are required, TfSE considers that decisions should be guided by long-term outcomes and strategic objectives rather than solely by short-term financial savings.

Safety should remain the highest priority. Investment that contributes to reducing casualties and improving safety outcomes should be protected wherever possible, reflecting the fundamental role of the Strategic Road Network in supporting safe movement of people and goods.

Network resilience and long-term asset management should also be prioritised. Maintaining a reliable network and adapting infrastructure to climate-related risks is increasingly important in ensuring continued connectivity for communities, businesses and freight movements.

Environmental outcomes and decarbonisation should continue to be supported through investment that reduces emissions, improves network efficiency and contributes to wider environmental and health objectives. Funding reductions should avoid disproportionately affecting programmes that support the transition to a lower-carbon transport system.

Strategic connectivity and sustainable economic growth should remain a priority, particularly where investment supports productivity, housing delivery, access to labour markets and the efficient movement of freight.

Finally, TfSE considers it important to protect funding for future planning, strategic studies, innovation and RIS4 pipeline development. These activities provide the evidence base for future investment decisions and ensure that interventions are ready to be delivered when funding opportunities arise.

Overall, TfSE would encourage Government to prioritise funding towards activities that support safety, resilience, decarbonisation, sustainable growth and future network readiness, in line with both RIS3 objectives and the longer-term outcomes sought through strategic transport investment.

18 September 2026

Dear Sir/Madam,

**Support for the Sussex & Brighton Strategic Authority A27/A259
Integrated Transport Growth Corridor Digital Twin Proposal**

Transport for the South East (TfSE) is pleased to support the Sussex & Brighton Strategic Authority's application to the Department for Transport's Integrated Transport Digital Twin Fund for the A27/A259 Integrated Transport Growth Corridor Digital Twin.

Transport for the South East (TfSE) is the Sub-national Transport Body for the South East of England, bringing together local transport authorities, district and borough councils, business representatives and national delivery partners to provide a unified voice on strategic transport investment across the region. TfSE has a vision led [Transport Strategy](#) in place to influence government decisions about where, when and how to invest in our region to 2050. The strategy sets out five missions to deliver our vision: Strategic Connectivity, Resilience, Inclusion and Integration, Decarbonisation and Sustainable Growth. Our [Strategic Investment Plan](#) provides a framework for delivering our Transport Strategy, setting out transport infrastructure and policy interventions needed across the region over the coming decades.

The A27/A259 corridor along the south coast is one of the South East's most significant transport corridors. It plays a critical role in connecting communities, businesses, ports, visitor destinations and key economic centres across Sussex and the wider region. However, the corridor continues to experience longstanding challenges relating to congestion, journey time reliability, resilience and overall network performance. With significant growth planned along the corridor, addressing these challenges remains consistent with priorities identified through TfSE's strategic planning work and ongoing programmes, including work exploring future delivery, funding and financing approaches for the corridor.

TfSE has worked closely with the Sussex & Brighton Strategic Authority and project partners during the development of this proposal, contributing strategic transport expertise, analytical capability, regional

evidence and experience from our analytical and data programmes to help shape the bid.

A particular strength of this proposal is that it is able to build on capability that already exists within the region. Over recent years TfSE has invested significantly in developing our Analytical Framework programme, including regional data architecture, data management arrangements, modelling capability, visualisation tools and a wider evidence base to support transport planning across the South East. TfSE also operates regional data assets and analytical capabilities, including our PostgreSQL data platform, Regional Travel Survey, Mobile Network Data analysis and wider analytical and modelling programmes. Since the launch of the TfSE data hub in early 2025, the platform has been used by a growing number of partners and stakeholders including constituent local transport authorities and government bodies, demonstrating the value of shared regional data and analytical capability this project builds on.

The proposed Digital Twin offers an opportunity to build upon these foundations rather than starting from first principles. By leveraging existing investment and capability, the project can focus on integrating a wider range of transport, environmental and operational datasets, enhancing decision-support capability and developing practical applications to support resilience, incident management, investment planning and future growth. A significant element of TfSE's proposed match funding contribution will be represented through this previous investment in regional analytical and data capability, together with the ongoing contribution of officer time, expertise and programme support.

TfSE believes the project has the potential to deliver significant benefits through:

- Improved understanding of transport system performance across the A27/A259 corridor.
- Enhanced resilience and response to network disruption.
- Stronger integration of data, analytics and decision making across organisations.
- Improved evidence to support investment prioritisation and business case development.
- Greater understanding of how transport networks interact with future growth and development.

The project also presents an opportunity to generate learning that may be transferable to other parts of the South East. TfSE's Analytical Framework, database and regional evidence base have been developed at a South East scale, creating many of the analytical and data foundations required for future digital twin applications. The project therefore offers an opportunity to demonstrate how a common regional analytical foundation can support digital twin approaches across multiple emerging strategic authority geographies, helping to maximise the value of public investment and accelerate wider adoption across the region.

Should the bid be successful, TfSE would welcome the opportunity to continue supporting the programme as a strategic partner and contributor to delivery, building on the data architecture and platform management role already committed to in the Digital and Data Case. Subject to governance approvals, funding arrangements and resource availability, this could include continued officer support, strategic transport expertise, analytical support, regional evidence, contribution of agreed in-kind resources, and assistance in disseminating lessons learned across the wider region.

We welcome the ambition being shown by the Sussex & Brighton Strategic Authority in bringing together partners to develop this proposal. TfSE believes the project represents a valuable opportunity to build upon existing regional capability, address challenges on a strategically important corridor, and explore innovative approaches to improving transport planning, resilience and decision-making. We look forward to continuing to work with the Sussex & Brighton Strategic Authority and project partners to support delivery of the programme and maximise the benefits of this investment for transport users, communities and businesses across the region.

Yours faithfully,



Rupert Clubb
Chief Officer, Transport for the South East

Dear Sir/Madam,

**Kent County Council bid to the Structures Fund -
A226 Galley Hill Permanent Reinstatement**

I am writing to express Transport for the South East's support for Kent County Council's submission to the Structures Fund to secure funding for the permanent reinstatement of the A226 Galley Hill corridor.

Transport for the South East (TfSE) is the Sub-national Transport Body for the South East of England, bringing together local transport authorities, district and borough councils, business representatives and national delivery partners to provide a unified voice on strategic transport investment across the region. TfSE have a vision led [Transport Strategy](#) in place to influence government decisions about where, when and how to invest in our region to 2050. The strategy sets out five missions to deliver our vision: Strategic Connectivity, Resilience, Inclusion and Integration, Decarbonisation and Sustainable Growth. Our [Strategic Investment Plan](#) (SIP) provides a framework for delivering our Transport Strategy, setting out transport infrastructure and policy interventions needed across the region over the coming decades.

Maintaining resilient and reliable transport networks is a fundamental component of delivering our Transport Strategy. The proposed reinstatement of the A226 Galley Hill corridor aligns particularly strongly with TfSE's Resilience mission, while also supporting Strategic Connectivity, Inclusion and Integration and Sustainable Growth through the restoration of an important transport link serving communities and businesses across North Kent.

The continued closure of Galley Hill represents the loss of an important component of the transport network within North Kent. While the impacts are felt most directly by local communities, the consequences extend much further, affecting movement across a wider travel-to-work area that includes Dartford, Gravesham, Ebbsfleet and the Thames Estuary growth corridor. The route has historically played an important role in supporting local connectivity, economic activity and access to employment, education and essential services. Its loss has reduced journey reliability, increased travel distances and placed additional pressure on surrounding roads and communities.



0300 3309474

tfse@eastsussex.gov.uk

transportforthesoutheast.org.uk

Transport for the South East, County Hall,
St. Anne's Crescent, Lewes, BN7 1UE

From a regional transport perspective, the scheme is particularly important because it supports the delivery of housing, employment and sustainable economic growth across one of the South East's most significant growth corridors. The route serves the wider Ebbsfleet Garden City area, where substantial housing and employment growth is planned, including the delivery of up to 15,000 homes and significant commercial development opportunities.

The impacts of the closure extend beyond transport users alone. Longer diversion routes have increased pressure on local roads, contributing to congestion, reduced journey time reliability and wider environmental impacts all of which have impacts on local communities. The loss of the route has also disrupted public transport services, including the Fastrack network, reducing connectivity between communities, employment areas and key services. Reinstating Galley Hill will help reconnect communities, improve accessibility and restore confidence in the wider transport network.

TfSE recognises the strategic importance of maintaining resilient transport corridors. The A226 forms part of a wider resilient network within Kent and provides an important alternative route to the A2, supporting the safe and efficient movement of people and goods. Reopening the route will enhance network resilience, provide greater flexibility during incidents and planned maintenance, and improve the long-term reliability of transport connections that are essential to residents, businesses and the wider economy.

The scheme therefore aligns closely with TfSE's objectives of improving connectivity, supporting sustainable economic growth, enhancing resilience and enabling the delivery of strategic development across the region. Investment in this scheme will provide benefits extending beyond the immediate locality, helping to strengthen transport links across North Kent and supporting the continued growth of nationally significant development areas.

TfSE's Transport Strategy recognises the importance of a transport network that can manage, absorb and recover from disruption, while highlighting that a resilient, well-maintained network reduces long-term costs for both users and the public sector. Given the importance of the A226 to local connectivity, network resilience and the delivery of planned growth across North Kent, TfSE considers this scheme to represent a strong case for investment through the Structures Fund.

TfSE therefore supports Kent County Council's application to the Structures Fund and looks forward to a positive funding decision that will enable the permanent reinstatement of this strategically important route, restoring connectivity and supporting continued growth and prosperity across North Kent and the Thames Estuary.

Yours sincerely

Rupert Clubb
Chief Officer, Transport for the South East



0300 3309474

tfse@eastsussex.gov.uk

transportforthesoutheast.org.uk

Transport for the South East, County Hall,
St. Anne's Crescent, Lewes, BN7 1UE

31st July 2026

Dear Sir/Madam,

Kent County Council bid to the Structures Fund - A299 Whitstable to Ramsgate

I am writing to express Transport for the South East's support for Kent County Council's submission to the Structures Fund for the A299, including its carriageway, overbridges and tunnels.

Transport for the South East (TfSE) is the Sub-national Transport Body for the South East of England, bringing together local transport authorities, district and borough councils, business representatives and national delivery partners to provide a unified voice on strategic transport investment across the region. TfSE have a vision led [Transport Strategy](#) in place to influence government decisions about where, when and how to invest in our region to 2050. The strategy sets out five missions to deliver our vision: Strategic Connectivity, Resilience, Inclusion and Integration, Decarbonisation and Sustainable Growth. Our [Strategic Investment Plan](#) (SIP) provides a framework for delivering our Transport Strategy, setting out transport infrastructure and policy interventions needed across the region over the coming decades.

Maintaining the resilience and reliability of the Major Road Network (MRN) is an important component of delivering our Transport Strategy and SIP. The proposed works on the A299 align particularly strongly with TfSE's Resilience mission, while also supporting Strategic Connectivity and Sustainable Growth, by helping to maintain a reliable strategic corridor supporting communities, businesses and freight movements across East Kent.

The A299 is part of the MRN, reflecting its importance as one of the Kent's busiest and most economically important Local Authority 'A' roads. TfSE has worked closely with government and local authorities to identify, advise on and support investment priorities across the MRN, recognising the important role these routes play in connecting communities, supporting economic growth and improving network resilience.

The A299 also interfaces with a number of wider transport and development proposals in East Kent, including the proposed North Thanet Link, also on the MRN. Ensuring the route remains reliable and resilient will help maximise the benefits of other government investment across the area.



0300 3309474

tfse@eastsussex.gov.uk

transportforthesoutheast.org.uk

Transport for the South East, County Hall,
St. Anne's Crescent, Lewes, BN7 1UE

The route is also part of the diversion in case of closures or planned work on the A2, which emphasises its role in supporting the Strategic Road Network (SRN). This is especially important because maintaining the availability of the A299 ensures greater resilience for people and freight accessing the Port of Dover, particularly when the Lower Thames Crossing is open in the early/mid-2030s and the M2/A2 becomes the primary route to the Port.

Planned investment along the A299 will also be supported by addressing the structural deficiencies along the route. This includes significant planned housing and employment growth, alongside major investment opportunities such as the consented reopening of Manston Airport for cargo, greater usage of the Port of Ramsgate, and other emerging development opportunities in East Kent, such as a £120m waste-to-hydrogen facility (also at Manston).

Failure to address the range of assets at risk on the A299 could lead to increasing speed restrictions, weight restrictions and ultimately closures of critical sections of the route. This would impact residents, businesses and freight operators, place additional pressure on unsuitable local roads, reduce the resilience of both the local and strategic transport networks, and would ultimately stifle economic growth.

TfSE's Transport Strategy recognises the importance of a transport network that can manage, absorb and recover from disruption, while highlighting that a resilient, well-maintained network reduces long-term costs for both users and the public sector. Given the strategic importance of the A299 to the Major Road Network, its role in supporting regional and national transport resilience, and the risks associated with ongoing deterioration of these assets, TfSE considers this scheme to represent a strong case for investment through the Structures Fund. Securing investment would help safeguard the long-term reliability of this critical corridor and support the continued movement of people and goods across East Kent and the wider South East.

TfSE therefore supports Kent County Council's application to the Structures Fund and looks forward to a positive funding decision that will help secure the long-term resilience and reliability of this strategically important route.

Yours sincerely

Rupert Clubb
Chief Officer, Transport for the South East



0300 3309474

tfse@eastsussex.gov.uk

transportforthesoutheast.org.uk

Transport for the South East, County Hall,
St. Anne's Crescent, Lewes, BN7 1UE

Dear Sir/Madam,

Brighton & Hove City Council bid to the Structures Fund – A259 Kings Road Arch Strengthening

I am writing to express Transport for the South East's (TfSE) support for Brighton & Hove City Council's submission to the Structures Fund to secure funding for Phases 6 and 7 of the A259 Kings Road Arches Bridge Strengthening Works.

Transport for the South East (TfSE) is the Sub-national Transport Body for the South East of England, bringing together local transport authorities, district and borough councils, business representatives and national delivery partners to provide a unified voice on strategic transport investment across the region. TfSE has a vision-led [Transport Strategy](#) in place to influence government decisions about where, when and how to invest in our region to 2050. The strategy sets out five missions to deliver our vision: Strategic Connectivity, Resilience, Inclusion and Integration, Decarbonisation and Sustainable Growth. Our [Strategic Investment Plan](#) (SIP) provides a framework for delivering our Transport Strategy, setting out transport infrastructure and policy interventions needed across the region over the coming decades.

The proposed Kings Road Arches strengthening works align particularly strongly with TfSE's Resilience mission, while also supporting Strategic Connectivity, Inclusion and Integration, Decarbonisation and Sustainable Growth. The scheme is identified within TfSE's Strategic Investment Plan as intervention CR01, recognising its importance to the resilience and operation of the Sussex Coast corridor and the wider regional transport network. The route also forms part of the Major Road Network (MRN) and TfSE has played a key role in advising Government on investment priorities across the MRN, recognising the importance of these routes in supporting strategic connectivity, economic growth and network resilience.

The A259 Kings Road is a critical east-west transport corridor along Brighton seafront, carrying significant volumes of motor traffic, pedestrians and cyclists while providing access to the city centre, seafront attractions, businesses, public transport connections and wider coastal communities. The Victorian arches supporting the route form a critical transport asset



0300 3309474

tfse@eastsussex.gov.uk

transportforthesoutheast.org.uk

Transport for the South East, County Hall,
St. Anne's Crescent, Lewes, BN7 1UE

whose continued operation is fundamental to the resilience and reliability of the wider transport network.

The strengthening works form part of a long-term programme to maintain and improve the structural integrity of the arches. Continued investment is essential to reducing the risk of future deterioration, restrictions and disruption on this strategically important route. The scheme will help maintain connectivity for residents, businesses and visitors, support public transport and active travel movements, and safeguard access to one of the South East's most important economic, tourism and cultural destinations.

The scheme has additional strategic significance as it builds upon previous investment already secured for earlier phases of the Kings Road Arches strengthening programme. The Department for Transport's recent approval of MRN funding for Phases 4 and 5, supported by earlier work involving TfSE, demonstrates the recognised importance of this asset and the wider programme. Funding for Phases 6 and 7 would help maximise the value of that investment, ensuring the benefits of earlier phases are protected and enabling the continued delivery of a coordinated long-term approach to maintaining this critical structure.

The scheme contributes to the resilience of the wider A259 corridor. As part of the Major Road Network and the principal east-west route along much of the South Coast, maintaining the integrity of key assets such as the Kings Road Arches helps ensure that the benefits of investment are realised not only at individual locations but across the corridor as a whole.

The scheme also complements wider transport investment along the corridor, including the recently completed Valley Gardens programme, which has improved conditions for public transport, walking and cycling within Brighton city centre. Maintaining the resilience and reliability of the Kings Road corridor will help ensure these wider investments continue to deliver their intended benefits and support an integrated transport network across the city.

TfSE's Transport Strategy recognises the importance of a transport network that can manage, absorb and recover from disruption, while highlighting that a resilient, well-maintained network reduces long-term costs for both users and the public sector. Given the scheme's identification within TfSE's Strategic Investment Plan as intervention CR01, its location on the Major Road Network, and its importance to regional connectivity, resilience and

economic activity, TfSE considers this project to represent a strong case for investment through the Structures Fund.

TfSE therefore supports Brighton & Hove City Council's application to the Structures Fund and looks forward to a positive funding decision.

Yours sincerely

Rupert Clubb
Chief Officer, Transport for the South East

31st July 2026

Dear Sir/Madam,

Hampshire County Council bid to the Structures Fund – A3023 Langstone Bridge Hayling Island

I am writing to express Transport for the South East's (TfSE) support for Hampshire County Council's submission to the Structures Fund to secure funding for the repair and refurbishment of Langstone Bridge, the sole road connection between Hayling Island and the mainland.

Transport for the South East (TfSE) is the Sub-national Transport Body for the South East of England, bringing together local transport authorities, district and borough councils, business representatives and national delivery partners to provide a unified voice on strategic transport investment across the region. TfSE has a vision-led [Transport Strategy](#) in place to influence government decisions about where, when and how to invest in our region to 2050. The strategy sets out five missions to deliver our vision: Strategic Connectivity, Resilience, Inclusion and Integration, Decarbonisation and Sustainable Growth. Our [Strategic Investment Plan](#) (SIP) provides a framework for delivering our Transport Strategy, setting out transport infrastructure and policy interventions needed across the region over the coming decades.

The Langstone Bridge Repair Scheme is identified as a priority intervention within TfSE's Strategic Investment Plan (Scheme ref CR06). The scheme aligns particularly strongly with TfSE's Resilience mission, while also supporting Strategic Connectivity, Inclusion and Integration and Sustainable Growth through the protection of a vital connection between Hayling Island and the mainland.

Langstone Bridge is one of Hampshire's most strategically important transport assets, providing the only road access to and from Hayling Island. The bridge plays a vital role in connecting residents to employment, education, healthcare and other essential services on the mainland, while also supporting visitor access and the island's tourism economy. The importance of this connection is heightened by the socio-economic challenges experienced in parts of the Havant area, where maintaining reliable access to jobs and services is particularly important.



0300 3309474

tfse@eastsussex.gov.uk

transportforthesoutheast.org.uk

Transport for the South East, County Hall,
St. Anne's Crescent, Lewes, BN7 1UE

Constructed in the 1950s, the bridge now requires substantial repair and strengthening works to ensure its continued serviceability. The proposed works include extensive concrete repairs, strengthening of key structural elements, installation of a new waterproofing system, resurfacing works and parapet refurbishment. Given the bridge's role as the sole road access to Hayling Island, any significant restrictions or closure would have substantial consequences for residents, businesses and visitors.

The scheme strongly supports TfSE's Resilience mission by safeguarding a critical transport asset and reducing the risk of future restrictions or loss of connectivity. It also supports Strategic Connectivity by maintaining an essential link between Hayling Island and the mainland, Inclusion and Integration by preserving access to employment, education, healthcare and other key services, and Sustainable Growth by supporting local businesses, tourism and wider economic activity. The proposed programme of repairs will provide a long-term solution, helping to ensure this important connection continues to support communities and the local economy for years to come.

TfSE's Transport Strategy recognises the importance of a transport network that can manage, absorb and recover from disruption, while highlighting that a resilient, well-maintained network reduces long-term costs for both users and the public sector. Given the strategic importance of Langstone Bridge, its role as the sole road access to Hayling Island and its identification as a priority intervention within TfSE's Strategic Investment Plan, TfSE considers this project to represent a strong case for investment through the Structures Fund.

TfSE therefore supports Hampshire County Council's application to the Structures Fund and looks forward to a positive funding decision that will help safeguard the long-term resilience, reliability and economic contribution of this strategically important transport link.

Yours sincerely

Rupert Clubb
Chief Officer, Transport for the South East

31st July 2026

Dear Sir/Madam,

Isle of Wight Council bid to the Structures Fund – B3327 Newport Road (Lowtherville Graben)

I am writing to express Transport for the South East's support for Isle of Wight Council's submission to the Structures Fund to secure funding for the B3327 Newport Road in Ventnor.

Transport for the South East (TfSE) is the Sub-national Transport Body for the South East of England, bringing together local transport authorities, district and borough councils, business representatives and national delivery partners to provide a unified voice on strategic transport investment across the region. TfSE have a vision led [Transport Strategy](#) in place to influence government decisions about where, when and how to invest in our region to 2050. The strategy sets out five missions to deliver our vision: Strategic Connectivity, Resilience, Inclusion and Integration, Decarbonisation and Sustainable Growth. Our [Strategic Investment Plan](#) (SIP) provides a framework for delivering our Transport Strategy, setting out transport infrastructure and policy interventions needed across the region over the coming decades.

The proposed B3327 Newport Road scheme aligns particularly strongly with TfSE's Resilience mission, while also supporting Strategic Connectivity, Inclusion and Integration and Sustainable Growth. The scheme seeks to address the long-term impacts of ground movement associated with the Lowtherville Graben, a significant geological feature that has caused progressive damage to the highway, footways and essential infrastructure over many decades. The strategic importance of the route is recognised within TfSE's Strategic Investment Plan, where the scheme is identified as intervention CR10, reflecting its importance in maintaining connectivity, strengthening network resilience and adapting to the impacts of climate change.

The B3327 Newport Road is a critical transport corridor providing one of only three access routes to Ventnor, Bonchurch and St Lawrence, serving a resident population of approximately 7,000 people. Importantly, all three access routes to the Undercliff area are affected by varying levels of geotechnical instability and landslide risk. The western section of the A3055 Undercliff Drive has already been severed by historic landslides, while the



0300 3309474

tfse@eastsussex.gov.uk

transportforthesoutheast.org.uk

Transport for the South East, County Hall,
St. Anne's Crescent, Lewes, BN7 1UE

eastern A3055 Leeson Road is increasingly vulnerable to ground movement. As a result, maintaining a safe and reliable Newport Road has become increasingly important to the continued accessibility and resilience of these communities.

The Lowtherville Graben has been monitored for many years and continues to experience persistent ground movement, resulting in ongoing settlement and deformation of the carriageway. Historical records demonstrate that damage to the route has become progressively more severe, requiring repeated interventions to maintain a safe highway profile. Monitoring data indicate that periods of sustained rainfall can accelerate ground movement, highlighting the growing challenge that climate change and more frequent extreme weather events present to transport infrastructure. The scale of movement is creating increasing operational challenges for buses, freight vehicles and other road users, while continued deterioration risks more frequent disruption, rising maintenance costs and potential restrictions on this important route.

Maintaining reliable access via Newport Road is essential to avoiding the isolation of communities within the Undercliff area and preserving access to employment, education, healthcare and other key services. The route supports local bus services, active travel movements, local businesses and visitor access, including the tourism and hospitality economy that is an important part of Ventnor's prosperity. Disruption to the route can also create wider costs for public services, including the need for alternative school transport arrangements where normal bus access is no longer possible. Investment in the route will therefore help support community connectivity, the visitor economy and the efficient delivery of local public services.

TfSE's Transport Strategy recognises the importance of a transport network that can manage, absorb and recover from disruption, while highlighting that a resilient, well-maintained network reduces long-term costs for both users and the public sector. Given the strategic importance of the B3327 Newport Road, the risks associated with continued ground movement at the Lowtherville Graben, and its identification within TfSE's Strategic Investment Plan as intervention CR10, TfSE considers this project to represent a strong case for investment through the Structures Fund. Securing funding would help safeguard the long-term resilience and reliability of this essential transport connection and support the continued prosperity and connectivity of communities across the Ventnor area.

TfSE therefore supports Isle of Wight Council's application to the Structures Fund and looks forward to a positive funding decision that will enable the delivery of this important resilience scheme.

Yours sincerely

Rupert Clubb
Chief Officer, Transport for the South East



0300 3309474

tfse@eastsussex.gov.uk

transportforthesoutheast.org.uk

Transport for the South East, County Hall,
St. Anne's Crescent, Lewes, BN7 1UE

31st July 2026

Dear Sir/Madam,

Surrey County Council bid to the Structures Fund – Bisley Bridge

I am writing to express Transport for the South East's (TfSE) support for Surrey County Council's submission to the Structures Fund to secure funding for the replacement of Bisley Bridge on the A322 Guildford Road in Surrey.

Transport for the South East (TfSE) is the Sub-national Transport Body for the South East of England, bringing together local transport authorities, district and borough councils, business representatives and national delivery partners to provide a unified voice on strategic transport investment across the region. TfSE have a vision led [Transport Strategy](#) in place to influence government decisions about where, when and how to invest in our region to 2050. The strategy sets out five missions to deliver our vision: Strategic Connectivity, Resilience, Inclusion and Integration, Decarbonisation and Sustainable Growth. Our [Strategic Investment Plan](#) (SIP) provides a framework for delivering our Transport Strategy, setting out transport infrastructure and policy interventions needed across the region over the coming decades.

Maintaining the resilience and reliability of the Major Road Network (MRN) is an important component of delivering our Transport Strategy and SIP. The proposed replacement of Bisley Bridge aligns particularly strongly with TfSE's missions relating to Strategic Connectivity, Resilience and Sustainable Growth, while also supporting our objectives for Inclusion and Integration and Decarbonisation.

The bridge occupies a strategically important location on the A322, forming a key link between the M3 motorway and the A3 at Guildford as part of the MRN. As such, it plays an important role in enabling the movement of people, freight and services across Surrey and the wider South East. TfSE has worked closely with government and local authorities to identify, advise on and support investment priorities across the MRN, recognising the important role these routes play in connecting communities, supporting economic growth and improving network resilience.



0300 3309474

tfse@eastsussex.gov.uk

transportforthesoutheast.org.uk

Transport for the South East, County Hall,
St. Anne's Crescent, Lewes, BN7 1UE

Bisley Bridge is now over 100 years old and has experienced significant deterioration of its critical structural elements, resulting in a substantial reduction in load-carrying capacity. The structure is currently monitored as a substandard bridge under CS470 and there is a risk that continued deterioration could ultimately require weight restrictions or closure. Any such restrictions would have significant implications for network performance, forcing traffic, including freight movements, onto less suitable routes and increasing congestion, journey times and wider impacts on local communities.

From a regional strategic perspective, the scheme strongly supports TfSE's Resilience mission by replacing an ageing and deteriorating asset before restrictions become necessary. It will provide a durable new crossing capable of accommodating modern traffic demands while safeguarding an important strategic corridor between the M3 and A3. The scheme also supports Inclusion and Integration through the provision of improved pedestrian and cycle facilities and Sustainable Growth and Decarbonisation by maintaining reliable connectivity, reducing the risk of diversionary traffic and supporting economic activity across Surrey and the wider South East.

TfSE's Transport Strategy recognises the importance of a transport network that can manage, absorb and recover from disruption, while highlighting that a resilient, well-maintained network reduces long-term costs for both users and the public sector. Given the strategic importance of the A322 corridor, the deteriorating condition of the existing bridge and the substantial benefits that replacement would provide in terms of resilience, safety, connectivity and active travel, TfSE considers this scheme to represent a strong case for investment through the Structures Fund.

TfSE therefore supports Surrey County Council's application to the Structures Fund and looks forward to a positive funding decision that will enable the delivery of this strategically important bridge replacement scheme.

Yours sincerely

Rupert Clubb
Chief Officer, Transport for the South East

31st July 2026

Dear Sir/Madam,

West Sussex County Council bid to the Structures Fund – Clympwick Bridge, A259 Littlehampton

I am writing to express Transport for the South East's support for West Sussex County Council's submission to the Structures Fund to secure funding for the repairs to Clympwick Bridge.

Transport for the South East (TfSE) is the Sub-national Transport Body for the South East of England, bringing together local transport authorities, district and borough councils, business representatives and national delivery partners to provide a unified voice on strategic transport investment across the region. TfSE have a vision led [Transport Strategy](#) in place to influence government decisions about where, when and how to invest in our region to 2050. The strategy sets out five missions to deliver our vision: Strategic Connectivity, Resilience, Inclusion and Integration, Decarbonisation and Sustainable Growth. Our [Strategic Investment Plan](#) (SIP) provides a framework for delivering our Transport Strategy, setting out transport infrastructure and policy interventions needed across the region over the coming decades.

Clympwick Bridge is part of the A259 Bognor Regis to Littlehampton enhancement scheme identified within TfSE's Strategic Investment Plan as an important transport investment corridor (scheme TB07), supporting improved connectivity, housing and employment growth, and sustainable economic development across coastal West Sussex. Maintaining the continued operation of Clympwick Bridge is essential to realising the benefits of these wider investments. The A259 also forms part of the Major Road Network (MRN). TfSE has played an important role in advising Government on investment priorities across the MRN, recognising the contribution these routes make to regional connectivity, economic growth and transport resilience.

The A259 Clympwick Bridge Strengthening Scheme aligns particularly strongly with TfSE's Resilience mission, while also supporting Strategic Connectivity, Sustainable Growth and Inclusion and Integration. The bridge represents the only crossing of the River Arun south of the A27 and carries the A259 across the River Arun between Littlehampton and Bognor Regis. It is a strategically important asset on both the MRN and West Sussex's



0300 3309474

tfse@eastsussex.gov.uk

transportforthesoutheast.org.uk

Transport for the South East, County Hall,
St. Anne's Crescent, Lewes, BN7 1UE

Strategic Road Network. Carrying more than 30,000 users each day, it provides a vital connection for residents, businesses and visitors and supports the resilience of the wider transport network.

Without intervention, there is a risk that further deterioration could ultimately require restrictions or closure, with significant consequences for journey reliability, network resilience and the operation of surrounding local and strategic road networks. The bridge's importance is further demonstrated by its role in supporting wider resilience on the A259 corridor and providing an alternative route during incidents and planned works elsewhere on the network, including its potential use as a diversionary route associated with future National Highways investment on the A27 corridor.

The wider benefits of the scheme extend beyond the immediate locality. The A259 forms part of the Major Road Network and functions as a strategic corridor linking communities, businesses and key economic destinations along the Sussex coast. Its resilience depends upon the continued operation of key structures and assets throughout the route. Investment in Clympwick Bridge would therefore contribute to the long-term reliability of the wider corridor, supporting connectivity, economic activity and network resilience across a broader geographic area.

TfSE's Transport Strategy recognises the importance of a transport network that can manage, absorb and recover from disruption, while highlighting that a resilient, well-maintained network reduces long-term costs for both users and the public sector. Given the bridge's strategic role within the Major Road Network, its importance to regional connectivity and resilience, and its contribution to supporting future growth along the Sussex coast, TfSE considers this scheme to represent a strong case for investment through the Structures Fund.

TfSE therefore supports West Sussex County Council's application and looks forward to a positive funding decision that will help secure the long-term resilience, reliability and economic contribution of this strategically important transport asset.

Yours sincerely

Rupert Clubb
Chief Officer, Transport for the South East



0300 3309474

tfse@eastsussex.gov.uk

transportforthesoutheast.org.uk

Transport for the South East, County Hall,
St. Anne's Crescent, Lewes, BN7 1UE

31st July 2026

Dear Sir/Madam,

**Royal Borough of Windsor and Maidenhead bid to the Structures Fund –
Cookham Bridge**

I am writing to express Transport for the South East's support for the Royal Borough of Windsor and Maidenhead's submission to the Structures Fund for the Cookham Bridge Scheme.

Transport for the South East (TfSE) is the Sub-national Transport Body for the South East of England, bringing together local transport authorities, district and borough councils, business representatives and national delivery partners to provide a unified voice on strategic transport investment across the region. TfSE have a vision led [Transport Strategy](#) in place to influence government decisions about where, when and how to invest in our region to 2050. The strategy sets out five missions to deliver our vision: Strategic Connectivity, Resilience, Inclusion and Integration, Decarbonisation and Sustainable Growth. Our [Strategic Investment Plan](#) (SIP) provides a framework for delivering our Transport Strategy, setting out transport infrastructure and policy interventions needed across the region over the coming decades.

Maintaining resilient and reliable transport infrastructure is a fundamental component of delivering our Transport Strategy. The proposed Cookham Bridge Renewal Scheme aligns particularly strongly with TfSE's Resilience mission, while also supporting Strategic Connectivity, Inclusion and Integration, and Sustainable Growth through the protection and continued operation of an important local transport link serving residents, businesses and visitors in Berkshire and the wider Thames Valley.

Cookham Bridge is a narrow Grade II listed structure dating from 1867 and is one of only three river crossings in the local area. As a result, the bridge plays a vital role in maintaining access to employment, education, healthcare, local services and visitor destinations. When the bridge is unavailable, diversion routes are extensive, increasing journey times and placing additional pressure on other parts of the transport network.

Recent inspections have identified a number of significant structural issues requiring intervention, including deterioration of the cast-iron support



0300 3309474

tfse@eastsussex.gov.uk

transportforthesoutheast.org.uk

Transport for the South East, County Hall,
St. Anne's Crescent, Lewes, BN7 1UE

bracing, degradation of the timber fenders protecting the navigable spans, and failure of the existing protective paint system. Without investment, these issues could increase the risk of structural deterioration and future restrictions, affecting the reliability and resilience of this important crossing.

From a regional transport perspective, maintaining the operation of Cookham Bridge is important to ensuring communities remain connected and the wider transport network remains resilient. The scheme will help reduce the risk of unplanned closures, avoid lengthy diversionary journeys and support continued access to jobs, services, businesses and recreational destinations on both sides of the River Thames.

The scheme will also help preserve an important heritage asset while ensuring it continues to meet the needs of current and future users. By protecting a key transport link and avoiding the need for extensive diversions, the scheme will support local economic activity, community connectivity and the efficient operation of the wider transport network.

TfSE's Transport Strategy recognises the importance of a transport network that can manage, absorb and recover from disruption, while highlighting that a resilient, well-maintained network reduces long-term costs for both users and the public sector. Given the importance of Cookham Bridge to local connectivity, network resilience and community access, TfSE considers this scheme to represent a strong case for investment through the Structures Fund. Securing funding would protect a vital transport link, preserve an important heritage asset and help ensure the continued safe and reliable operation of this key river crossing.

TfSE therefore supports the Royal Borough of Windsor and Maidenhead's application to the Structures Fund and looks forward to a positive funding decision.

Yours sincerely

Rupert Clubb
Chief Officer, Transport for the South East

31st July 2026

Dear Sir/Madam,

Surrey County Council bid to the Structures Fund – Mole Bridge

I am writing to express Transport for the South East's support for Surrey County Council's submission to the Structures Fund to secure funding for the replacement of Mole Bridge in East Molesey.

Transport for the South East (TfSE) is the Sub-national Transport Body for the South East of England, bringing together local transport authorities, district and borough councils, business representatives and national delivery partners to provide a unified voice on strategic transport investment across the region. TfSE have a vision led [Transport Strategy](#) in place to influence government decisions about where, when and how to invest in our region to 2050. The strategy sets out five missions to deliver our vision: Strategic Connectivity, Resilience, Inclusion and Integration, Decarbonisation and Sustainable Growth. Our [Strategic Investment Plan](#) (SIP) provides a framework for delivering our Transport Strategy, setting out transport infrastructure and policy interventions needed across the region over the coming decades.

The proposed replacement of Mole Bridge strongly supports the delivery of these missions, particularly TfSE's objectives around Resilience, Strategic Connectivity and Inclusion and Integration. The bridge provides an important crossing of the River Mole and plays a vital role in maintaining connectivity between East and West Molesey, Esher, Kingston upon Thames and the wider London road network. The route also provides access to key destinations including Hampton Court Palace, Bushy Park and Heathrow Airport.

The existing structure is over 140 years old and is now in a significantly deteriorated condition. Extensive corrosion and structural deterioration affecting both the road bridge and adjacent footbridge have resulted in the bridge being managed as a substandard structure in accordance with CS470. Current Bridge Condition Indicator scores highlight the severity of deterioration, with a BCI Critical score of 39.52. Without intervention, there is a high likelihood that future weight or width restrictions will be required, with potentially significant consequences for local communities, businesses and the wider transport network.



0300 3309474

tfse@eastsussex.gov.uk

transportforthesoutheast.org.uk

Transport for the South East, County Hall,
St. Anne's Crescent, Lewes, BN7 1UE

From a regional transport perspective, the scheme is particularly important because it will maintain the resilience of a key river crossing and reduce the risk of future network disruption. Should restrictions become necessary, traffic would be diverted towards Hampton Court Bridge and Hampton Court Way, corridors that already experience congestion and play a strategic role in supporting movement between Surrey, South West London and the wider South East. The replacement of Mole Bridge will therefore help safeguard journey reliability, improve network resilience and reduce the risk of community severance.

The scheme also aligns strongly with TfSE's Inclusion and Integration mission. The proposed replacement bridge will address longstanding highway safety issues arising from the constrained carriageway width and limited visibility at nearby junctions. Importantly, it will provide a new shared pedestrian and cycle facility, replacing the existing substandard provision and creating safer, more attractive conditions for walking, wheeling and cycling. These improvements will help connect communities to employment, education, public transport and essential services while supporting healthier and more sustainable travel choices.

The project further supports TfSE's Decarbonisation and Sustainable Growth missions. By avoiding the need for lengthy diversions and reducing future congestion on alternative routes, the scheme will help minimise unnecessary vehicle emissions while supporting efficient movement throughout the local and regional economy. Maintaining a reliable crossing of the River Mole will also support local businesses, freight movements and access to key destinations, ensuring transport infrastructure continues to support economic activity and long-term prosperity across the area.

The proposed replacement of Mole Bridge represents a proactive investment that will deliver long-term benefits for residents, businesses and visitors while reducing future maintenance liabilities and operational risks.

TfSE's Transport Strategy recognises the importance of a transport network that can manage, absorb and recover from disruption, while highlighting that a resilient, well-maintained network reduces long-term costs for both users and the public sector. Given the strategic importance of the route, the condition of the existing structure and the substantial benefits the scheme will provide in terms of resilience, connectivity, safety and active travel, TfSE considers this proposal to represent a strong case for investment through the Structures Fund.

TfSE therefore supports Surrey County Council's application to the Structures Fund and looks forward to a positive funding decision that will enable the delivery of this strategically important bridge replacement scheme.

Yours sincerely

Rupert Clubb
Chief Officer, Transport for the South East



0300 3309474

tfse@eastsussex.gov.uk

transportforthesoutheast.org.uk

Transport for the South East, County Hall,
St. Anne's Crescent, Lewes, BN7 1UE

31st July 2026

Dear Sir/Madam,

East Sussex County Council bid to the Structures Fund – Rushey Hill

I am writing to express Transport for the South East's support for East Sussex County Council's submission to the Structures Fund to secure funding for the A259 Rushey Hill Embankment Stabilisation Scheme between Newhaven and Peacehaven.

Transport for the South East (TfSE) is the Sub-national Transport Body for the South East of England, bringing together local transport authorities, district and borough councils, business representatives and national delivery partners to provide a unified voice on strategic transport investment across the region. TfSE have a vision led [Transport Strategy](#) in place to influence government decisions about where, when and how to invest in our region to 2050. The strategy sets out five missions to deliver our vision: Strategic Connectivity, Resilience, Inclusion and Integration, Decarbonisation and Sustainable Growth. Our [Strategic Investment Plan](#) (SIP) provides a framework for delivering our Transport Strategy, setting out transport infrastructure and policy interventions needed across the region over the coming decades.

Maintaining resilient and reliable transport networks is a fundamental component of delivering our Transport Strategy. From a regional transport perspective, the stabilisation of the Rushey Hill embankment aligns particularly strongly with TfSE's Resilience mission by safeguarding critical transport infrastructure against ongoing deterioration and increasing climate-related risks. It also supports Strategic Connectivity, Inclusion and Integration, Sustainable Growth and Decarbonisation by maintaining access to jobs, services, public transport, active travel routes and economic opportunities along the Sussex coast.

The A259 forms part of the Major Road Network (MRN) and performs a critical strategic function as the principal east-west route along the South Coast, connecting coastal communities to employment, education, healthcare and other essential services. The route provides important connections to Brighton & Hove, Newhaven Port and the wider Sussex economy, while also supporting a high-frequency bus network and a key active travel link between Newhaven and Peacehaven. TfSE has played a key



0300 3309474

tfse@eastsussex.gov.uk

transportforthesoutheast.org.uk

Transport for the South East, County Hall,
St. Anne's Crescent, Lewes, BN7 1UE

role in advising Government on investment priorities for the Major Road Network across the South East, recognising the importance of these routes in supporting strategic connectivity, economic growth and network resilience. Maintaining the resilience and reliability of the A259 is therefore important both to the effective operation of the MRN and to delivering TfSE's wider Transport Strategy.

The strategic importance of the route is recognised within TfSE's Strategic Investment Plan, where the Rushey Hill Embankment Stabilisation Scheme is identified as intervention CR04. The inclusion of the scheme within the SIP reflects its significance not only to East Sussex but also to the wider South East transport network and demonstrates that it has been identified through TfSE's evidence-based investment planning process as a priority intervention that supports the resilience of a key section of the MRN.

The importance of this investment extends beyond the immediate location. As part of the wider A259 Major Road Network corridor, the resilience of the route depends on the continued operation of key assets and structures along its length. Long-term ground movement at Rushey Hill is causing cracking and deformation of both the highway and shared footway and cycleway, resulting in increasing maintenance requirements and creating a growing risk of landslip. The proposed scheme will address these issues through major drainage improvements, structural stabilisation works and reconstruction of the affected highway infrastructure. Without intervention, there is a risk of increasing disruption to a strategically important route serving communities, businesses, public transport and active travel movements along the Sussex coast. Given the constrained geography of the South Coast and the limited availability of alternative routes, the consequences of restrictions or closure would have disproportionately wide-ranging impacts on connectivity, journey reliability and public transport operations extending well beyond the immediate area. The scheme will also help support the long-term success of wider investment and growth initiatives along the corridor, including BSIP funded bus priority measures, the Exceat Bridge replacement project, and economic growth and regeneration associated with the Newhaven Enterprise Zone and wider Lewes District.

The scheme represents a compelling case for investment. With a Benefit Cost Ratio of 15.5, it offers very high value for money and will deliver significant benefits through improved network resilience, enhanced public transport reliability, greater climate resilience and support for sustainable economic growth. By addressing the root causes of the embankment

instability, the project will secure the long-term future of a strategically important section of the South Coast transport network and reduce the likelihood of more disruptive and costly interventions in the future.

TfSE's Transport Strategy recognises the importance of a transport network that can manage, absorb and recover from disruption, while highlighting that a resilient, well-maintained network reduces long-term costs for both users and the public sector. Given the importance of the A259 corridor, the role the Rushey Hill embankment plays in supporting movement along the Sussex coast, and the scheme's inclusion within TfSE's Strategic Investment Plan as intervention CR04, TfSE considers this project to represent a strong case for investment through the Structures Fund.

TfSE therefore supports East Sussex County Council's application to the Structures Fund and looks forward to a positive funding decision that will enable the delivery of this strategically important scheme, safeguarding a critical section of the transport network and supporting continued economic growth and connectivity of communities across East Sussex and the wider South East.

Yours sincerely

Rupert Clubb
Chief Officer, Transport for the South East

31st July 2026

Dear Sir/Madam,

Bracknell Forest Council bid to the Structures Fund – Station Roundabout (Highway Bridges)

I am writing to express Transport for the South East's support for Bracknell Forest Council's submission to the Structures Fund for the Station Roundabout scheme, including its structural waterproofing, vehicle restraint replacements, highway surface replacements and structural maintenance of the bridges.

Transport for the South East (TfSE) is the Sub-national Transport Body for the South East of England, bringing together local transport authorities, district and borough councils, business representatives and national delivery partners to provide a unified voice on strategic transport investment across the region. TfSE have a vision led [Transport Strategy](#) in place to influence government decisions about where, when and how to invest in our region to 2050. The strategy sets out five missions to deliver our vision: Strategic Connectivity, Resilience, Inclusion and Integration, Decarbonisation and Sustainable Growth. Our [Strategic Investment Plan](#) (SIP) provides a framework for delivering our Transport Strategy, setting out transport infrastructure and policy interventions needed across the region over the coming decades.

The proposed works on the Station Roundabout align particularly strongly with TfSE's Resilience mission, while also supporting Strategic Connectivity and Sustainable Growth, by helping to maintain a critical transport interchange serving Bracknell town centre and safeguarding nationally important rail movements between Reading and London.

The Station Roundabout is a strategically important junction within Bracknell town centre, providing access between the A329, the town centre, Bracknell Bus Station and Bracknell Railway Station. The bridges also carry traffic directly above the Reading to London railway line, meaning their continued safe operation is important for both local and national transport connectivity.

The scheme also aligns with TfSE's Inclusion and Integration mission by protecting an important interchange between road, rail and bus services,



0300 3309474

tfse@eastsussex.gov.uk

transportforthesoutheast.org.uk

Transport for the South East, County Hall,
St. Anne's Crescent, Lewes, BN7 1UE

helping people continue to access employment, education, services and leisure opportunities through an integrated transport network.

Renewal of the structural waterproofing for the two brick rail bridges above the Reading to London line are required to prevent ongoing water ingress, protecting the underlying structure and providing network resilience. This work would also mitigate future safety and operational risks on the strategically important rail corridor.

In addition to the rail line, replacement of the life-expired vehicle restraint systems and replacement of the highway surfaces will provide additional mitigation to future safety risks by preventing incursions on the rail tracks.

The scheme has been fully designed by Bracknell Forest Council, however, has not been able to move forward due to lack of funds. Approval for this bid will allow the Council to mobilise quickly with construction expected to take approximately four months. Delivering the works now would reduce the risk of further deterioration leading to restrictions or closure of the road and rail infrastructure. Closure of the road would cause severe delays, congestion and community severance for users accessing the town centre, rail station, bus station and A329. Any disruption to the railway would have consequences extending beyond the local area, affecting services on an important route between Reading and London.

TfSE's Transport Strategy recognises the importance of a transport network that can manage, absorb and recover from disruption, while highlighting that a resilient, well-maintained network reduces long-term costs for both users and the public sector.

TfSE therefore supports Bracknell Forest Council's application to the Structures Fund and looks forward to a positive funding decision that will help secure the long-term resilience, safety and reliability of these strategically important road and rail transport corridors.

Yours sincerely

Rupert Clubb
Chief Officer, Transport for the South East