

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

Date of meeting: **13 June 2022**

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

Title of report: **Responses to consultations**

Purpose of report: **To agree the draft responses submitted in response to various consultations**

RECOMMENDATIONS:

The members of the Partnership Board are recommended to agree the draft responses to the following consultations:

- (1) Port of London Authority - The Thames Vision: Consultation Spring 2022;**
 - (2) Department for Transport and Office for Zero Emission Vehicles – Consultation on ending the sale of new, non-zero emission buses, coaches and minibuses; and**
 - (3) Hampshire County Council – Local Transport Plan (LTP4)**
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1. Introduction

1.1 Transport for the South East (TfSE) has prepared responses to a number of recent consultations. This paper provides an overview of the responses to the following consultations:

- Port of London Authority - The Thames Vision: Consultation Spring 2022
- Department for Transport and Office for Zero Emission Vehicles – Consultation on ending the sale of new, non-zero emission buses, coaches and minibuses
- Hampshire County Council – Local Transport Plan (LTP4)

2. Port of London Authority - The Thames Vision 2050: Consultation Spring 2022

2.1 In March 2022, the Port of London Authority (PLA) launched an online consultation as part of their development of a new Thames Vision that will cover to 2050. One of the major aims of the new Thames Vision 2050 is to decarbonise the Port of London with an objective of achieving Net Zero by 2050 at the latest.

2.2 This consultation closed on 30 April 2022 and the officer level response that was submitted as part of the online questionnaire to the consultation is contained in

Appendix 1. The response sets out the role that Transport for the South East could play in working with the Port of London Authority going forward and highlights the recently published TfSE Freight, Logistics and Gateways Strategy as a useful document for the PLA to consider when exploring the opportunities for decarbonisation within the freight sector. Members of the Partnership Board are recommended to agree the response to this call for evidence.

3. Department for Transport and Office for Zero Emission Vehicles – Consultation on ending the sale of new, non-zero emission buses, coaches and minibuses

3.1 In March 2022, the Department for Transport (DfT) sought feedback on proposals to progress ending the sale of new non-zero emission buses. In addition to this, the DfT also launched a call for evidence on phasing out the sale of new, non-zero emission coaches and minibuses and invited views on:

- the challenges of transitioning to zero emission coaches and minibuses
- what would need to be true or in place to withdraw the sale of these vehicles
- what government could do to accelerate the transition to zero emission coaches and minibuses
- setting a realistic date to end the sale of these vehicles

3.2 This consultation closed on 4 March 2022 and the officer level response that was submitted is contained in Appendix 2. The response suggests 2030 as a suggested target date for all new bus sales to be zero-emission. Members of the Partnership Board are recommended to agree the response to this consultation.

4. Hampshire County Council – Local Transport Plan (LTP4)

4.1 In April 2022, Hampshire County Council (HCC) launched a public consultation on the County Council's new draft Local Transport Plan (LTP4). The draft LTP4 supersedes the current LTP3 which is no longer relevant to today's challenges and opportunities. Therefore, the draft LTP4 will provide a framework to guide the future of transport planning and investment in Hampshire to 2050 and focuses on transformational changes which include:

- shift away from planning for vehicles, towards planning for people and places;
- meet national priorities to decarbonise the transport system;
- reduce reliance on private car travel;
- support sustainable economic development and regeneration; and promote active lifestyles.

4.2 This consultation closes on 26 June 2022 and the draft response is contained in Appendix 3. Members of the Partnership Board are recommended to agree the response to this consultation.

5. Conclusion and recommendations

5.1 The members of the Partnership Board are recommended to agree the responses to the consultations that are detailed in this report.

RUPERT CLUBB
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Appendix 1

TfSE's response to PLA's Thames 2050 Strategy – Spring 2022 Consultation

Online questionnaire response prepared: Thu 28/04/2022

Deadline: Sat 30/04/2022

Background:

- This consultation follows on from PLA's initial Thames 2050 strategy consultation in summer 2021.
- TfSE provided a written response on 13/07/2021. That response included reference to TfSE's adopted transport strategy.

The Thames 2050 Questionnaire:

1. Trading Thames

- What actions do you think are needed for the success of the **Trading Thames**?
 - TfSE supports action T1 (Leverage Thames Freeport): The Freeport needs to build out and operate as a resilient sustainability and net zero carbon exemplar. Features should include renewables powering berthed vessels, for example. More consideration is needed about how to maximise use of more sustainable logistics modes shore-side, including how the north side Freeport can ensure it provides those more sustainable links to/from places south of the Thames.
 - TfSE supports action T2 (Secure rail and water freight infrastructure): rail/water and water/water supply chain links should be promoted and improved as much as possible – not least to help with decarbonisation, and to add more cross-modal choice and versatility.
 - TfSE supports action T3 (Reactivation of safeguarded wharves).
 - TfSE supports action T4 (Development of light freight on the river), especially if linked to micro-logistics solutions (eg e-bikes) and new express freight solutions by rail.
- What would you see as your role, or the role of your organisation in those actions?
 - TfSE's geographical role around the Thames is limited to the south side, east of the Greater London boundary – though we have an interest in developing better logistics solutions outside our immediate area too if it benefits our region.
 - As we set out in our July 2021 consultation response, we are a partnership organisation representing local transport authorities, LEPs and local planning authorities. We provide a unique channel of communication with those bodies and with DfT, National Highways, Network Rail and many other relevant stakeholders.
 - TfSE launches its new freight strategy and action plan at the ITT Hub event on 11 May 2022. The strategy covers a great deal of ground, including all freight modes. Decarbonisation (net zero CO₂ for transport in our area by 2050) is a fundamental TfSE aim.
 - TfSE is keen to work with PLA and other potential partners on or around the Thames to see our freight strategy delivered. The freight strategy will be available through <https://transportforthesoutheast.org.uk/our-work/freight-and-logistics/>.

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2. Destination Thames

- What actions do you think are needed for the success of the **Destination Thames**?
 - Under action D1 (Expand passenger travel pier/route network), we would encourage PLA to seek opportunities for passenger piers at other locations east of the existing network and outside the London boundary.
- What would you see as your role, or the role of your organisation in those actions?
 - We can work with riparian local authorities to identify priority places for such investment, in a coordinated way. We would aim to build on and add value to the lines of communication the PLA already has with those authorities.

3. Natural Thames

- What actions do you think are needed for the success of the **Natural Thames**?
 - TfSE supports the principles of the Natural Thames identified actions.
 - TfSE has no comments to make on specific issues raised in this section of the strategy.
- What would you see as your role, or the role of your organisation in those actions?
 - General support for ways to improve the Thames natural environment.
 - Acceptance that the natural environment should be as much a consideration of Thames-based investments and activities as economic development or social impacts/benefits.

Priorities for Action:

4. Do you agree that **safety** should be a cross cutting priority and what innovations or actions would you like to see in this area?
 - Strongly agree. No specific comments on innovations or actions.
5. Do you agree that **Net Zero** should be a cross cutting priority and what innovations or actions would you like to see in this area?
 - Strongly agree. Net Zero needs to be an increasing priority across both the private and public sectors – TfSE has its own 2050 net zero objectives. No specific comments on innovations or actions; there are other innovation and research bodies better placed, who could provide practical inputs.
6. Do you agree that **resilience** should be a cross cutting priority and what innovations or actions would you like to see in this area?
 - Resilience planning and provision is going to be increasingly important during the lifetime of the strategy. TfSE's own series of area studies have highlighted the need to build resilience and future proofing into major transport investments in the future. Careful consideration has to be given to the objectives and success criteria of building in resilience considerations to planning, infrastructure and operations along the river corridor.
7. Do you agree that **technological change** should be a cross cutting priority and what innovations or actions would you like to see in this area?
 - It is becoming increasingly complex to keep pace with the direction and extent of future technological development and potential 'disruptors'. Not all action areas or objectives should be expected to be dealt with by current, emerging and/or potential future technologies. Some goals (eg net zero carbon) may still require changes to operational or behavioural practices, such as restricting demand or curtailing some actions/activities.

Appendix 1

8. Do you agree that **access and inclusion** should be a cross cutting priority and what innovations or actions would you like to see in this area?
 - Matters such as access (whether physical access or access to services etc), inclusion, equality and diversity must be addressed with sensitivity and careful thought. Good practice must include positive, proactive involvement of relevant advisory groups in scheme design and operational review.
 - Plans for the future must include proper consideration around access, inclusion, equality and diversity – with a view to satisfying more than just the regulatory minimum.

General:

9. What other actions will be key to delivering Thames Vision 2050?
 - Consider how promoting and investment in logistics consolidation centres beside the Thames could provide benefits by promoting more sustainable choices for freight carrying and storage. They could help to promote the roles of rail-, water- and micro-logistics-based solutions (the last for first mile/last mile solutions especially) as part of the supply chain mix.

Zero Emission Bus and Coach Policy
3rd floor
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Emailed to: buses@dft.gov.uk

20 May 2022

Dear Sir/Madam

Ending the sale of new non-zero emission buses, coaches and minibuses

I am writing to you as Lead Officer for Transport for the South East (TfSE) to respond to DfT's consultation on setting a deadline for the sale of non-zero emission buses, coaches and minibuses.

As a sub-national transport body, TfSE represents sixteen local transport authorities: Brighton and Hove, East Sussex, Hampshire, Kent, Medway, Surrey, West Sussex, the Isle of Wight, Portsmouth and Southampton, and the six Berkshire unitary authorities. They are represented on the TfSE Partnership Board along with the region's five local enterprise partnerships, district and borough authority representatives, protected landscapes, National Highways, Network Rail and Transport for London.

TfSE published its transport strategy in July 2020. Its strategic vision includes achieving net zero carbon from transport in the region by 2050. With decarbonisation front and centre, this consultation is of particular interest to TfSE. This is a potential policy tool that can make a clear signal to the bus market and fits completely with what TfSE is aiming to achieve.

TfSE's answers to the specific questions in the consultation are set out in the attached paper.

This is an officer-level letter at this stage, subject to endorsement by TfSE's Shadow Partnership Board at its next meeting on 13 June; a further iteration of this response may therefore follow.

Yours faithfully



Rupert Clubb
Lead Officer, Transport for the South East
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TfSE response to DfT's consultation: Ending the sale of new non-zero emission buses, coaches and minibuses, May 2022

1/2. Views on setting a specific date between 2025 and 2032 for ending the sale of new non-zero emission buses

Yes, a specific date should be set that gives a clear steer to bus manufacturers, bus operators and others in the industry – such as those providing funding and financing on the direction that UK plc wants to follow. This should be a consistent approach with that for light vehicles (cars and vans), for example.

The impact of the increased 'cost of entry' to zero-emission bus operations, both in terms of the cost of purchasing the vehicles and the refuelling and recharging kit, on bus operating costs will need to be kept under careful review. This will be vital given the ongoing challenges with the financial viability of bus operations with higher costs meaning fewer buses operating on fewer routes.

Another key signal could be to have a clear target date for a minimum standard for internal combustion engine (ICE) buses: such as phasing out all service buses that do not meet Euro IV standards by 2025 and Euro V standards by 2030. Those dates should fall close to the times that most Euro IV/V buses should be life-expired anyway, but they could still offer a stretching target to some operators. The government could even reserve its position to bring a 2030 deadline for Euro V even earlier, if appropriate.

In the meantime, TfSE supports a market mechanism based on having higher BSOG payments for the lowest emission vehicles.

At present, the bus manufacturing industry does not seem geared up to producing 100% zero-emission vehicles from as early as 2025. There are very good zero-emission bus types available and the range is growing. There is a challenge too for the power supply industry as to whether it is geared up to upgrade many bus operators' depots to battery electric, hydrogen or some other solution by installing the necessary supply, storage and charging/refuelling infrastructure by that date.

One of the factors made apparent at the recent ITT Hub event (11/12 May 2022) was that there are industry players who can work together to provide turn-key solutions to supply of infrastructure, fuelling and new zero-emissions buses that can create potentially affordable deals for bus operators, taken over a 15-year operating life. The key thing to achieve this is to make sure that all the relevant suppliers work together on the complete product (a zero-emissions bus dept/sub-fleet), to manage total costs downwards. Decisions made early in the process of planning and potential investment can make a huge difference in whether such solutions become affordable or not.

Many bus fleets are leased, rather than bought outright. This may help to spread the initial capital investment over a longer period. At a time of increasing interest rates though, outright purchase may become more attractive over time.

Government and sub-national transport bodies may have a role in encouraging and facilitating those joined-up deals that can make zero-emission bus purchase, or conversions from ICE, more attractive.

3. [While the range 2025-2032 is outlined above we also welcome views on your preferred specific end date with reasons why you feel it is appropriate](#)

Bus manufacturers do not appear to be in a position to provide a wholly zero-emission solution for all new buses in the next 2-3 years. For example, the Scania Group¹ expect only 10% of their vehicle sales (trucks and buses) will be zero-emission by 2025 and 50% by 2030.

With that in mind, 1st January 2030 would seem to be the earliest that a deliverable target can be set for all new bus sales to be zero-emission. Even then, there may be aspects of the new bus supply chain that may find that deadline hard to deliver. But still, a clear statement of intent from the UK government will provide considerable momentum to make that target achievable – especially if supported by other nations too.

National and regional government have an important role in the meantime to encourage roll out of as many examples of zero-emission bus operation as possible. This should go beyond supporting demonstration projects; it must involve government working with the bus sector to accelerate take up of zero-emission bus solutions with the aim of normalising them.

4. [We also welcome views on the proposal to use an approach based on type approval categories](#)

The proposal in the consultation is that the end date under consideration should apply to all buses with a capacity of over 22 passengers plus driver, based on vehicle type approval classifications. This appears appropriate *provided that* this results in a joined-up solution along with the ban already in place on sales of new petrol- or diesel-only cars and vans from 2030, leaving no loopholes somewhere between the two.

5. [We welcome further views on the challenges arising from charging and refuelling infrastructure in ending the sale of new non-zero-emission buses and what more might be needed to address these challenges?](#)

¹ See <https://www.scania.com/group/en/home/sustainability/sustainable-transport/electrified-solutions.html>

There are many different ways of providing complete zero-emission bus solutions. Before long, there will need to be greater focus on open-access standards for charging and refuelling infrastructure. There is considerable concern that too much will end up being spent on different ways of achieving the same thing – not least because of the pace at which technological development provides new and improved solutions to problems.

Some of the zero-emission recharging/refuelling equipment required at depots (eg a new electricity sub-station or hydrogen storage/processing) may require planning consent prior to installation. This could represent an obstacle to an operator being able to adopt the technology, especially if consultees consider the proposal a ‘bad neighbour’ development). There needs to be a greater understanding among local planning authorities that, increasingly, bus operators will want to be able to upgrade their depots to have zero-emission fuelling capability – and to reflect that in their spatial policies. It may be that some of the required infrastructure may need to become Permitted Development (especially in the case of battery-electric).

6/7 Against this background we want to use this opportunity to obtain evidence and views to understand:

- the challenges to transitioning to a zero-emission coach/minibus fleet;
- what might be a realistic date to end the sale of new non-zero-emission coaches/ minibuses;
- what would need to be true/in place to make the phase out of non-zero-emission coaches/minibuses happen; and
- what might Government do to accelerate the transition.

Coaches/minicoaches used on private hire or express service work can have different operating cycles from buses in service. Coaches, for example, may not return to their home depot as often as service buses do. They need to be able to find refuelling locations wherever they operate.

This issue is linked to the STBs’ work on alternative fuels for HGVs. The project will identify locations on the SRN and other A-road network that might be best suited to provide electric and hydrogen (H₂) charging/refuelling. These will be locations along routes that see the greatest numbers of HGVs. If those facilities were then installed, they could be an important refuelling backbone for coach and minibus/minicoach operation too.

8 Do you consider the estimated impacts presented in the IA to be reasonable? If not, please specify the changes you would make, noting which assumptions and uncertainties you believe to be incorrect.

TfSE does not intend to offer a response on this issue. The bus industry itself is better placed to respond in an informed way.

- 9 How do you expect the upfront cost of:
- Battery electric buses
 - Hydrogen fuel-cell buses
 - Battery replacements
 - Fuel-cell replacements
 - Electric powertrains
- to change over the period 2025 to 2032. Please provide, or cite, any evidence you may have, or which informed your understanding
- TfSE has no specific evidence on this at present.
- 10 In the absence of any policy/regulation, what would you expect the uptake of zero emission buses to be over the period 2025 to 2032
- TfSE would expect uptake to be slower than putting a target date in place. We have no specific information on the extent to which this would be the case, but there is a lot more work to be done in the areas of electric bus design, battery technology, H₂ production/ transport and refuelling/charging infrastructure to decrease costs and develop emerging standardised technology approaches.
- 11 Do you believe that changes proposed through Ofgem’s Access and Forward-looking Charges Significant Code Review: Consultation will contribute to reducing the cost of obtaining sufficiently large electrical connections at bus depots?
- TfSE has no specific views or evidence on this point.
- 12 Do you have any evidence to indicate that additional zero emission buses might be needed on routes, given current and expected technological developments, and if so to what extent?
- Busier bus routes may require more vehicles if, say, battery-electric buses are unable to provide the same passenger capacity as the buses they replace(d). This could also be the case if converting operation to zero-emission attracted increases in passenger demand.
- There is then the wider issue that, to meet longer term (2050) decarbonisation targets, a higher proportion of trips will need to be made by modes including bus. That also points to a need to grow the fleet beyond a like-for-like replacement.
- 13 Do you have views/evidence on any potential impact that investment in zero emission buses over the period 2025-2032 might have on patronage and fares?
- This depends on whether fare levels are to be set purely on the basis of a commercial return sufficient to meet profit expectations, along with operating and capital costs; or are set to achieve other transport policy goals. Those goals could include modal shift away from private cars to more efficient forms of shared transport or to address the historic imbalance in the real terms rise in the cost of

using public transport compared to the cost of motoring over the last 30 years, for example.

In the medium term, in the absence of market intervention in fares setting, commercial fares could well rise faster for zero-emission bus fleets if all relevant capital costs are factored in. In the longer term, that trend should decrease as much of the fixed infrastructure could already be in place.

14-24 (various)

TfSE has no specific views or evidence on questions 14-24. Many of these are best addressed by operators and other providers in the bus sector.

- 14 Providing any evidence, how would you expect zero emission and conventional powertrain purchases to vary in the years prior to the implementation of the end of sales date?
- 15 How might you expect the end of sales to effect bus sector and related exports?
- 16 Providing evidence, if possible, what do you understand the operating lifespan of the following types of vehicles to be?
 - a. Diesel buses
 - b. Battery electric buses
 - c. Hydrogen fuel cell buses
- 17 Please explain your understanding, providing evidence where appropriate, of the costs and barriers relating to the provision of infrastructure for zero emission buses (both hydrogen and battery electric).
- 18 What impact might the proposed policy have on different population demographics and social groups, particularly those with defined protected characteristics under the Equality Act 2010?
- 19 Please outline your understanding, providing evidence, if possible, of the future apportioning of the bus fleet between hydrogen fuel cell and battery electric buses.
- 20 Do you believe that ending the sale of new, non-zero emission buses might cause operators to stretch the operational life of existing non-zero emission buses? If yes, please outline the extent to which you believe this might occur.
- 21 In relation to powertrains, how do you expect purchasing decisions to vary in the period preceding any end of sales?
- 22 Please outline your understanding of the need, and costs relating to mid-life component replacements for battery electric and hydrogen fuel cell buses.
- 23 Based on the Impact Assessment, what payback time, in years, would be economical for battery electric technology to be utilised in a given bus fleet?
- 24 Based on the Impact Assessment, what payback time, in years, would be economical for hydrogen fuel cell electric technology to be utilised in a given bus fleet?
- 25 Any other comments?

None specifically.

Transport for the South East

May 2022

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Emailed to:

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23 May 2022

Dear Sirs,

Transport for the South East (TfSE) response to Hampshire County Council's Local Transport Plan 4 (LTP4) consultation

I am writing to you in my role as Chair of [Transport for the South East](#) (TfSE) in response to the consultation on Hampshire County Council's draft Local Transport Plan (LTP4).

TfSE is a sub-national transport body which represents sixteen local transport authorities in the South East of England. These are Brighton and Hove, East Sussex, Hampshire, Kent, Medway, Surrey, West Sussex, the Isle of Wight, Portsmouth and Southampton, and the six Berkshire unitary authorities. These authorities are represented on the Partnership Board, which is its decision-making body, along with representatives from the region's five Local Enterprise Partnerships, district and borough authorities, protected landscapes, Highways England, Network Rail and Transport for London.

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

TfSE welcomes the opportunity to comment on Hampshire County Council's draft Local Transport Plan 4. As you will be aware TfSE published a thirty-year transport strategy for the South East in July 2020, which sets out an ambitious vision for our area in 2050. As one of our constituent authorities, Hampshire County Council has been fully involved in the development of our strategy and we very much value the contribution that has been made to the development of the strategy as well as the ongoing support for the wider work of TfSE.

We are very pleased to see that the proposed vision and outcomes of the LTP4 align well with the vision, strategic goals and priorities of our transport strategy. Our transport strategy seeks to deliver sustainable economic growth that achieves the right balance between the economic, social and environmental pillars of sustainable development. This means that any intervention in the area's transport networks to address connectivity challenges must ensure that the environment is protected and where possible enhanced and that opportunities to improve the health, wellbeing and quality of life for everyone are realised



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We welcome the acknowledgement and emphasis within the draft local transport plan to propose a major shift away from the traditional approach to transport planning by focusing on planning for vehicles and instead reiterating the need to focus on planning for people and places going forward. This ambition and shift in approach supports the method set out in our transport strategy which also highlights the need to move away from a predict and provide approach to one based on planning for people and places. It involves a shift towards a decide and provide approach to transport provision based on choosing a preferred future with preferred transport outcomes encapsulated in our 2050 Vision.

TfSE welcomes the commitment from Hampshire County Council on aiming to achieve a complete reduction of transport-related carbon emissions to net zero by 2050. It is clear that you recognise the scale of this challenge and the step change to future planning for transport that will be required to achieve this. Transport is the single biggest contributor to greenhouse gas emissions in the southeast and across the UK. This needs to change, so our transport strategy also includes a commitment to meet the Government's target of achieving net zero carbon emissions by 2050. To achieve this and our wider 2050 vision, we need to make better use of the infrastructure we already have – reducing the need to travel through increased investment in digital and other technology and providing alternative ways for people to go about their business through increased investment in public transport and active travel. However, there will still be a need for targeted investment on our congested road and rail networks to relieve pinch points.

We are currently in the process of developing our Strategic Investment Plan (SIP) for the region (due for consultation in summer 2022 and publication in March 2023). This will be a blueprint for strategic transport investment in the South East for the next 30 years and it is likely that this document will support some of the interventions set out in the Strategic Opportunity Areas.

We look forward to working together with you as you continue to develop your plan, and we would be happy to discuss any opportunities for further collaboration and sharing of data to our mutual benefit. This will help ensure that our strategic investment plan and your transport plan align in their thinking and outputs. We wish you well with the next stages in the development of your local transport plan.

Yours sincerely,

Cllr Keith Glazier

Chair

Transport for the South East



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