

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

Date of meeting: **26 September 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**

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***RECOMMENDATIONS:***

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

- (1) Transport for London – Consultation on proposals to extend the Ultra-Low Emission Zone (ULEZ);**
  - (2) Department for Transport – Consultation on primary legislative changes to reform our railways;**
  - (3) Gatwick Airport - Gatwick Airport Northern Runway Project: Summer 2022 Consultation;**
  - (4) Department for Transport - Consultation to update the Strategic Road Network (SRN) and the delivery of sustainable development (circular 02/2013); and**
  - (5) Great British Railways Transition Team - Rail Freight Growth Target Call for Evidence**
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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:

- Transport for London – Consultation on proposals to extend the Ultra-Low Emission Zone (ULEZ);
- Department for Transport – Consultation on primary legislative changes to reform our railways;
- Gatwick Airport - Gatwick Airport Northern Runway Project: Summer 2022 Consultation;
- Department for Transport - Consultation to update the Strategic Road Network (SRN) and the delivery of sustainable development (circular 02/2013); and
- Great British Railways Transition Team - Rail Freight Growth Target Call for Evidence

## **2. Transport for London – Consultation on proposals to extend the Ultra-Low Emission Zone (ULEZ)**

2.1 In May 2022, Transport for London (TfL) launched a consultation on their proposals to extend the Ultra-Low Emission Zone (ULEZ) from 29 August 2023. Under the new proposals, the new boundary would cover almost all of Greater London, up to the existing Low Emission Zone (LEZ) boundary. The consultation also sought preliminary views on the future of road user charging in the capital.

2.2 This consultation closed on 29 July 2022 and the officer level response that was submitted is contained in Appendix 1. The consultation response acknowledges that there is a need for action in order to mitigate air quality issues and the adverse health impacts of pollutants emitted by road traffic, but highlights a number of concerns that TfSE have identified regarding the current proposals provided by Transport for London. In terms of the proposals to introduce a future London-wide road user charging scheme, the response states that the proposals set out are currently at a very early stage and that TfL would need to prepare an extensive evidence base in support of any road user charging scheme. Members of the Partnership Board are recommended to agree the response to this consultation contained in Appendix 1.

## **3. Department for Transport – Consultation on primary legislative changes to reform our railways**

3.1 In June 2022, the Department for Transport (DfT) sought views on primary legislative changes required to effect rail reform as set out in the Williams-Shapps Plan for Rail. The consultation focused on:

- the core functions and duties of Great British Railways
- a new governance framework
- a reform of wider industry structures and processes

In addition to this, the DfT were also seeking evidence of the risks and potential implications of the policies proposed to inform their impact assessments.

3.2 This consultation closed on 4 August 2022 and the officer level response that was submitted is contained in Appendix 2. The response highlights the important role that TfSE, and the other STBs, can play in relation to the future development of the railway and rail transformation. Members of the Partnership Board are recommended to agree the response to this consultation.

## **4. Gatwick Airport - Gatwick Airport Northern Runway Project: Summer 2022 Consultation**

4.1 In Summer 2022, Gatwick Airport Limited (GAL) ran a 6-week focused consultation on updated road designs to their proposed Northern Runway plans, following on from stakeholder feedback in the Autumn 2021 consultation on the project. In addition to updated road designs for the proposals, GAL also sought further feedback on their updated plans for car parks, hotels, offices, the airfield, water management, carbon and noise at the airport. The proposals are currently at the pre-

application stage of the Development Consent Order (DCO) process and GAL have indicated that they are likely to submit their application in the first half of 2023 at the earliest.

4.2 This consultation closed on 27 July 2022 and the officer level response that was submitted is contained in Appendix 3. The response confirms that TfSE neither support or oppose GAL's Northern Runway Proposals at this time and highlights that a number of aspects of the proposals require further information in order to enable the potential impacts of the proposals to be more fully assessed. Members of the Partnership Board are recommended to agree the response to this consultation contained in Appendix 3.

## **5. Department for Transport - Consultation to update the Strategic Road Network (SRN) and the delivery of sustainable development (circular 02/2013)**

5.1 In July 2022, the Department for Transport (DfT) launched a consultation on proposed changes to Circular 02/13. The purpose of this Circular is to set out planning policy in relation to the strategic road network and roadside facilities. The circular also gives details on how National Highways will fulfil its remit to be a delivery partner for sustainable economic growth whilst maintaining, managing and operating a safe and efficient Strategic Road Network. The proposed changes aim to:

- strengthen environmental policies in response to the transport decarbonisation plan and the drive towards zero emission transport
- implement policy to reflect a recent written ministerial statement about lorry parking and a new section on freight facilities
- clarify policy in order to address legal issues
- remove or amend out of date material

5.2 This consultation closed on 15 September 2022 and the officer level response that was submitted is contained in Appendix 4. Overall, the response welcomes the proposed change of emphasis from mitigation via highways measures towards promotion of sustainable and non-highway transport interventions. Members of the Partnership Board are recommended to agree the response to this consultation.

## **6. Great British Railways Transition Team - Rail Freight Growth Target Call for Evidence**

6.1 In the Williams-Shapps Plan for Rail, the UK Government committed to setting a rail freight growth target. The Department for Transport (DfT) has commissioned the Great British Railways Transition Team (GBRTT) to develop a range of rail freight growth target options. In July 2022, the GBRTT launched a call for evidence with the purpose of understanding how much of the current and future market demand for freight could be met by rail, and the role rail can play in the nation's supply chains. The call for evidence will help GBRTT to understand the realistic volume of goods that could be transferred to rail; where the potential for future rail freight traffic exists and where new rail terminals could be needed.

6.2 This consultation closes on 27 September 2022 and the draft response is contained in Appendix 5. The appendix provides responses from TfSE to the questions set out by GBRTT as part of this call for evidence. Members of the Partnership Board are recommended to agree the response to this consultation.

## **7. Conclusion and recommendations**

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

**RUPERT CLUBB**  
**Lead Officer**  
**Transport for the South East**

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28 July 2022

Dear ULEZ Consultation Team

### **Consultation on proposal to extend the London ULEZ scheme from August 2023**

I am writing to you as Technical Lead for Transport for the South East (TfSE) in response to TfL's consultation on the Mayor's proposal to extend the ultra-low emissions zone (ULEZ) scheme to cover the whole of Greater London (with some detailed boundary differences) from 29 August 2023.

As a sub-national transport body, TfSE represents sixteen local transport authorities. 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. 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.

TfL has provided a strong evidence base about air quality and the adverse health impacts of pollutants emitted by road traffic in support the proposal to extend the London ULEZ. From that evidence, not least the contravention of World Health Organisation (WHO) air quality guidelines, the need for further action is clear.

TfSE also recognises that further expansion of the ULEZ as proposed would deliver additional air quality improvements for the capital. However, outside London, within the TfSE area, the proposed ULEZ expansion will most affect people and businesses closest to the Greater London Authority (GLA) boundary, in east Berkshire (Slough, Windsor & Maidenhead), Surrey and Kent. The proposal will then impact proportionately less on people and businesses further out from the GLA boundary— but still in significant numbers.

Administrative boundaries are effectively artificial in day-to-day life; people and businesses operate without particular regard to them. This is especially true in contiguous communities that straddle the boundary, such as Crayford/Dartford. The functional cross-boundary relationships between places in outer London and in the inner orbital TfSE area are important (whether for work/business, education, health,

leisure, or any other needs). NHS Hospital Trusts' operational boundaries for example are not limited by the GLA boundary. The further extended ULEZ will impact people and businesses in ways that have not yet been sufficiently understood.

Neither TfL nor TfSE have specific details of the numbers, types and origins/destinations of the cross-boundary journeys involved, broken down by age of vehicle (which would help determine the extent of potential ULEZ non-compliance). This means it is not possible to identify the numbers and locations of people and businesses in the TfSE area whose current activities would be affected. This makes it difficult for TfSE to reach a fully informed view on the proposals.

Until a full set of mitigation measures has been identified, funded and ready to be put in place to address the issues – both within and outside London – TfSE considers the proposed extension of the ULEZ zone extension to be premature. To address this, further joint action by the Mayor of London and by national government, partnering with the relevant non-London local authorities most affected (among other stakeholder interests) will be required. More data collection and analysis will be needed (including on potential economic, social and behavioural impacts) about the roll-out of the October 2021 ULEZ extension within London (both inside and outside the zone), and in non-London boroughs/districts adjacent or close to the zone boundary. That data gathering may be an essential requirement for national government, so it can target its own resources effectively on identified impacts of these ULEZ proposals outside London.

Issues of particular concern that have been identified by TfSE are as follows:

**Lack of travel alternatives:** The Mayor of London has been able to dedicate a considerably higher level of resource to provide alternatives to private car use over the years than authorities outside London. However, the density of the available public transport network is considerably lower in outer London than in inner London (the boroughs of Bexley and Kingston – which abut the TfSE area – are not served by any tram, Underground or Overground services, for example). Inner London tends to have a more comprehensive public transport offer than places beyond the GLA boundary. Likewise cycle hire, dedicated cycle routes, car clubs and other alternatives follow the same pattern. Consequently, there will be a disproportionate negative impact on people and businesses outside London because of the relative lack of travel alternatives. That will be especially inequitable for those least able to afford to update the vehicle(s) they use or pay the £12.50 daily charge. Further work should be undertaken on analysing the impacts of the proposal on low-income groups outside London and firm proposals drawn up to mitigate these impacts.

**Economic impacts:** Reducing the ease of connectivity across the London boundary risks negative economic impacts on communities and businesses both inside and outside the boundary. The impacts could be worse where businesses that are still struggling to recover post-Covid, for which an extra

daily charge, or the cost of replacing vehicles they use, would be too much at this time.

**Scrappage scheme(s):** The proposal includes “the largest scrappage scheme [that is] feasible”, but this is only intended to cover residents and businesses within London. The same scrappage scheme will be needed for people, businesses and other organisations outside London. Achieving this will require direct funding from national government. The Mayor must collaborate with national government to ensure a joined-up solution is ready before the ULEZ expansion goes ahead. This may also require collaboration with bodies such as the Society of Motor Manufacturers and Traders to minimise the impacts of rising prices (and possibly lack of supply) for new and/or second hand ULEZ-compliant vehicles on those least able to afford them.

**Temporary exemptions:** Where TfL propose temporary exemptions from the ULEZ charge, the periods of time for those exemptions are not long enough for people outside London – not least because of the relative lack of alternative means of travel. Consideration must be given to extending [temporary] exemption to those who would not fall within the exemption categories proposed but who can demonstrate a reasonable case on the basis of hardship.

**Publicity:** There must be a strong and widespread publicity campaign prior to introducing any proposed change to the ULEZ zone. The effects of the proposals (and the alternatives being offered) would need to be clear to people both inside and outside Greater London.

**Specific operational practicalities:** There must be very clear highway signing so drivers understand when they are approaching or entering the zone – along with clear advice about appropriate alternatives.

The consultation also raises the question of potentially introducing a **London-wide road user charging scheme** in the future. The proposals set out in the consultation document are at a very early stage, and consequently there is little detail to comment on at this point.

TfSE modelled the potential high-level impacts of a national road user charging scheme on future travel demand, the economy, population growth and carbon emissions as part of the supporting evidence base for its draft Strategic Investment Plan (SIP). The results of this work demonstrate that a national road user charging scheme is one of several national transport policy interventions that will be needed to deliver the strategic priorities identified in the SIP.

In any event, some form of national road user charging may need to be considered by Government to compensate for the decline fuel duty that will result from the ban on petrol and diesel cars and vans that comes into effect in 2030. However, there is

a risk that any scheme that is solely configured to replace this lost revenue may not enable wider demand management objectives to be achieved.

Introducing a London-only road user charging scheme could have significant adverse effects on traffic patterns around the edge of London that would need to be identified, understood, mitigated and managed. Depending on the charging schedule for such a scheme, there could be even greater adverse social and economic impacts than the proposed all-London ULEZ expansion, particularly where movement takes place across the scheme boundary.

TfL would need to prepare an extensive evidence base in support of any road user charging scheme (including for places beyond the London boundary) and test a range of different charging options. This would then enable the potential impacts to be readily understood and adverse impacts suitably mitigated by TfL themselves, or by national government for places outside London. The potential impact on lower income households would be an issue which would need to be thoroughly investigated.

It is too early to say whether a London-only road user charging scheme would be appropriate without a strong supporting evidence base and considerably more detail about how a scheme would work in practice.

Thank you for the opportunity to comment on these proposals. This is an officer-level letter at this stage, subject to endorsement by TfSE's Partnership Board at its next meeting on 26 September; a further iteration of this response may therefore follow.

Yours faithfully



Mark Valleley  
Technical Lead, Transport for the South East



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Emailed to: [railconsultation@dft.gov.uk](mailto:railconsultation@dft.gov.uk)

2 August 2022

Dear Rail Transformation Programme Team

### **Legislation to Implement Rail Transformation**

I am writing to you in my role as Technical Lead for Transport for the South East (TfSE) in response to the Department's consultation on the potential legislation that will be required to deliver the transformation of the country's railways. This includes arrangements to set up Great British Railways (GBR), which is to act as the "guiding mind" behind the railway as envisaged by the rail white paper.

As a sub-national transport body (STB), TfSE represents sixteen local transport authorities. 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. Each of these authorities is represented on the TfSE Partnership Board along with representatives from the region's five local enterprise partnerships, district and borough authorities, protected landscapes, National Highways, Network Rail and Transport for London.

Both TfSE's transport strategy (published in July 2020) and its draft Strategic Investment Plan (SIP), which is subject to public consultation between June and September this year, were both based on extensive technical work. This means they are underpinned by a robust supporting evidence base. TfSE's response to this consultation takes account of that evidence base and the numerous formal and informal discussions with our key stakeholders.

TfSE supports the formation of GBR and has valued the opportunities it has had to date to liaise with the GBR Transition Team (GBRTT).

This consultation document mainly addresses aspects of rail transformation that require new primary legislation to achieve them. There are some matters that can be dealt with by new/amended secondary legislation or through existing powers. The consultation document does not go into detail on those matters which makes it hard to perceive the full picture of mechanisms for how the Government proposes the new railway should be operated and governed.

This response does not seek to answer all the questions posed in the consultation document – many of them cover topics on which TfSE has no specific expertise or

knowledge. The points we raise below are cross-referenced to the questions that are of most relevance.

STBs were created through the amendments in the Local Transport Act 2008 made by section 21 of the Cities and Local Government Devolution Act 2016. The general functions of STBs (as set out in s102H of the 2008 Act) include:

- Providing advice to the Secretary of State for Transport about the exercise of transport functions in relation to [their] areas (s102H(1)(b));
- Coordinating the carrying out of transport functions ... that are exercisable by different constituent authorities (s102H(1)(c)); and
- Making other proposals to the Secretary of State about the role and functions of the STB (s102H(1)(e)).

TfSE considers that there is a strong role for STBs in relation to the railway and in rail transformation. TfSE's Transport Strategy sets out an important role for the railway to help meet TfSE's strategic objectives. TfSE's draft SIP highlights project proposals to enhance the contribution from the railway over the life of TfSE's transport strategy, as part of a multi-modal investment programme. STBs offer their constituent authorities the opportunity to come together to liaise with and shape plans of key national network operators such as National Highways and Network Rail.

The rail white paper (published by DfT in May 2021) highlights the important role of partnering in the transformed railway. GBR should "work openly and transparently with local, devolved and commercial partners" (Williams-Shapps Plan for Rail, p30). GBR will "work with and be responsive to the needs of local and regional partners" (p40 text box). "In England, new partnerships with Great British Railways' regional divisions will give towns, cities and regions greater control over local ticketing, services and stations (heading, p41).

TfSE values the positive working relationship it has established and maintained with the railway – in particular with Network Rail's Southern and Wales & West regions, but also with train operators, the Rail Delivery Group and other bodies such as the Rail Freight Group. Network Rail has worked closely with TfSE to help develop the draft SIP. TfSE is represented on the challenge panel that Network Rail's Southern region's plans and proposals for control period CP7 (2024-2029). TfSE has been involved as a key stakeholder in Network Rail's study work on Solent to the Midlands freight and investigations such as the Paddington-Reading, Reading Area and Wessex Route studies. So, there is already valuable and mutually beneficial work going on between the railway and TfSE – just as with other STBs. Those arrangements can be built upon further, through clarity from Government in the legislation for the railway highlighting the importance of partnering with England's STBs.

Of particular interest to TfSE, the rail white paper includes a proposition for "a new strategic partnership" for London and the South East, to be established to "support housing, economic growth and the environment across the highly interconnected

transport network in that part of the country” (p42). It would be highly advantageous to have the relevant STBs (TfSE, England’s Economic Heartland (EEH) and Transport East (TE)) as key partners to that work, because of the importance of:

- A coordinated approach to rail-based transport solutions for London and the South East as a whole. The three STBs can provide an important counterpoint to the attention that might otherwise be given to the needs of Greater London; and
- An integrated approach to transport planning, spatial planning and economic development for the whole London and the South East area.

Through representation of their respective constituent bodies and the positive influence they bring to bear in promoting delivery of government policy, STBs are well placed to provide regionally based partnering to realise the government’s aims for the railway, as well as each STB’s own key objectives. To do so requires the relevant STBs to be able to input into the specifications of Passenger Service Contracts (PSCs), developing and growing rail freight and the railway’s long term planning process.

TfSE understands the operational reasoning behind the geographical definition of Network Rail’s routes and regions (which we assume will be taken forward to become GBR’s regional breakdown too). The regional organisation of the railway and the areas covered by each STB can be very different, which affects the quality of collaboration that is possible. Some STB areas operate in three separate Network Rail regions, each with its own approach to engagement and collaboration with the STB(s). To overcome this, GBR will need to work closely with the STBs on ensuring effective and joined-up collaboration. For its part, TfSE does not see a particular need for altering the railway’s regional geographies to achieve that improved interface.

It is therefore TfSE’s advice to the Secretary of State to include in legislation a specific requirement for the transformed railway to partner with STBs across England on the delivery of better local and regional transport solutions and on the strategic planning that will provide the necessary framework for this into the future. Such a requirement on the railway (especially on GBR) could be made in either primary legislation (which many STBs would prefer) or, if not, through supporting regulations. These points relate to **Question 1** (and paragraph 2.8, fourth bullet) and **Question 2** (and paragraph 2.9) of the consultation document.

**Question 8** and **Question 9** ask about how competition is dealt with on the railway. In the TfSE area, there have been few (if any) open access passenger operations. Open access for freight is however a very important consideration.

**Question 8** asks whether ORR’s competition duty (“to promote competition in the provision of railway services for the benefit of users of railway services” – Railways Act 1993, section 4(d)) should be amended so ORR also is to take account of public sector spending – with a view to protecting taxpayers (paragraph 2.49 in the consultation document refers). It is important that ORR’s competition duty takes a balanced view on how railway resources (especially train paths on busier routes)

should be allocated. ORR would need to take account of user benefits and impact on taxpayers, along with other government policies and other duties that the government may give to GBR. For example, a separate consultation by GBR TT is asking about whether GBR should be given specific targets to grow freight operation on the railway. Such a requirement will have an impact on how train paths might be allocated in future (including, potentially, between competing freight operating companies) – which in turn is relevant to ORR’s competition duty.

**Question 9** asks about whether the competition requirements of Chapter I of the Competition Act 1998 should be disapplied to the railway, so as not to stop train operators collaborating – if GBR directs them to do so (paragraphs 2.50-2.55 of the consultation document refer). GBR could usefully make such directions to provide better services for users, better value for money etc. The consultation document proposes that such directions should lead to defined benefits, though it is not clear whether a definition of valid reasons will appear in the legislation and/or whether there would be a requirement on GBR to define what the intended benefits of collaboration will be.

TfSE sees strong advantages in allowing inter-operator cooperation and collaboration. The instances where GBR may direct such collaboration should include (but not be restricted to) improving the service offered to rail users, improving value for money (including for public sector funding) and/or delivering key government policy objectives. More limiting definitions of those circumstances in legislation risks GBR not being able to provide and promote best use of the railway.

TfSE also supports potential legislation to require GBR to look beyond its own estate and its own operations. GBR needs to consider its own duties as part of the wider transport network and play its part in delivering central government (and hence STBs’) transport objectives. GBR also needs to factor more thinking about first mile/last mile travel (especially for passengers) into its likely responsibility for operating stations itself, among other things. STBs, including TfSE, are more than happy to work alongside GBR as it does this.

This is an officer-level response at this stage that is subject to endorsement by TfSE’s Partnership Board at its next meeting on 26 September. A further iteration of this response may therefore follow.

Yours faithfully

Mark Valleley  
Technical Lead, Transport for the South East

Emailed to: [feedback@gatwickfutureplans.com](mailto:feedback@gatwickfutureplans.com)

26 July 2022

To whom it may concern,

## **Gatwick Northern Runway Project Consultation – Summer 2022**

I am writing to you in my role as Technical Lead for Transport for the South East (TfSE) in response to the latest consultation on Gatwick Airport's Northern Runway Proposals.

Transport for the South East (TfSE) is a sub-national transport body (STB) that represents sixteen local transport authorities. 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.

TfSE welcomes the opportunity to comment on the refined proposals set out in the further round of targeted consultation that Gatwick Airport Limited (GAL) is currently undertaking.

We understand that proposals for the project are currently at the pre-application stage of the Development Consent Order (DCO) process, therefore a formal response will be submitted at the acceptance stage.

### Carbon emissions and climate change

Transport is currently the single biggest contributor to Green House Gas emissions. Action needs to be undertaken to address this and our transport strategy includes a commitment to meet the Government's target of achieving net zero carbon emissions by 2050, at the latest. Gatwick Airport Limited should aim for a proposal of this size to be an exemplar project in delivering on sustainable growth and tackling climate change within the transport sector.

In the Autumn 2021 consultation, the Preliminary Environmental Impact Report suggested that there will be an increase in overall carbon emissions of 1.387 MtCO<sub>2</sub>e at the 2038 assessment year as a consequence of the expansion plans. The Government's Transport Decarbonisation Plan (TDP), and the recently published Jet Zero Strategy, sets out the Government's commitments and the actions needed to decarbonise the entire transport system in the UK and to deliver net zero aviation by 2050. Following on from the publication of the Jet Zero Strategy, TfSE would advise GAL to consider revising and updating the Economic Impact Assessment and other carbon assessments as part of the airport's DCO application.

TfSE notes that Gatwick Airport Limited still plans to submit a draft Carbon Action Plan as part of the future application for development consent that will aim to set out the actions and mitigation required for the airport to reduce the impacts of carbon emissions. As part of the development of the Carbon Action Plan, it is critical that GAL works with key stakeholders to consider ways in which greenhouse gas emissions can be reduced. Until this report is available, it will not be possible to determine the extent to which the expansion plans will contribute to the Government's mandated target of achieving net zero carbon emissions by 2050.

### Surface access and car parking

As set out in our response to the Autumn 2021 consultation, the proposed expansion of Gatwick Airport will have significant impacts on the transport system in and around the surrounding areas of Gatwick Airport and these impacts will need to be satisfactorily addressed as part of the proposals.

We note the changes to the highway proposals that have been made following the Autumn 2021 consultation. However, the changes do not appear to have incorporated sufficient additional measures to make using sustainable modes of travel a more attractive option for staff and passengers. As a consequence, they will not contribute to the current objectives of increasing the proportion of passengers using sustainable forms of transport from 48% in 2020 to 60% by 2030.

TfSE welcomes the revised forecasting of car parking provision at the airport following on from feedback received as part of the Autumn 2021 consultation. A decrease from the initially proposed amount of 18,500 additional car parking spaces down to 12,025 is a positive outcome from the previous consultation. TfSE still questions the need for this level of increase in car parking spaces with the forecast increase in passenger movements being accommodated through investment in more sustainable forms of travel.

We note that you plan to develop an updated draft Airport Surface Access Strategy (ASAS), as part of a future DCO application submission, that will provide further detail and information around your commitment to increasing the proportion of trips that are made by public transport and other sustainable transport modes. TfSE will look forward to reviewing this Strategy as part of your ongoing work for the Northern Runway Proposals.

### Employment and economy

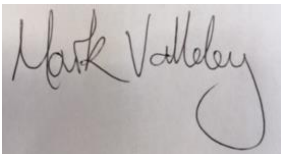
The projected increase of 18,400 additional job opportunities by 2038 continues to be welcomed by Transport for the South East. We note that you are refining your Employment, Skills and Business Strategy (ESBS) following on from comments received as part of the Autumn 2021 consultation and will also develop a ESBS Implementation Plan that will be submitted as part of any future DCO application. TfSE would wish to

review this when this is published to identify how the employment opportunities arising from potential airport expansion could be maximised.

In conclusion, at this point in the process TfSE's position is that it neither supports nor opposes the proposals to bring the northern runway into regular routine use. As has been highlighted in this response and our response that was submitted as part of the Autumn 2021 consultation, there are a number of aspects of the proposals where further information is required to enable the potential impacts of the proposals to be more fully assessed. In addition, clear and robust strategies need to be developed to deal with the potential impacts of the proposed expansion plans on carbon emission and noise and ensure that a greater proportion of those travelling to the airport as passengers or employees can do so using sustainable forms of transport. It is vital that all of the documentation and supporting information relating to the proposals is made available to enable thorough scrutiny as the proposals progress through the DCO process. In the meantime, the Airport will continue to be an important consideration for TfSE as we continue to develop our Transport Strategy. We will welcome continued engagement with Gatwick Airport Limited as your expansion proposals are developed further and appreciate there will be a further opportunity to respond during the DCO process.

This is an officer response. The TfSE Partnership Board meets on 26 September 2022 and will consider this draft response and a further iteration of it may therefore follow.

Yours sincerely,

A rectangular box containing a handwritten signature in black ink that reads "Mark Valleley".

Mark Valleley  
Technical Lead  
Transport for the South East

## **Response from Transport for the South East to the consultation on proposed changes to DfT Circular 02/2013: strategic Road network and the delivery of sustainable development**

### **1. Introduction**

1.1 The Government is proposing to make a number of changes to the Department for Transport (DfT)'s circular 02/2013: Strategic road network and the delivery of sustainable development (C02/2013). The purpose of this Circular is to set out planning policy in relation to the strategic road network and roadside facilities. The circular also gives details on how National Highways will fulfil its remit to be a delivery partner for sustainable economic growth whilst maintaining, managing and operating a safe and efficient Strategic Road Network.

1.2 The revised circular:

- makes a number of changes to strengthen environmental policies in response to the transport decarbonisation plan and the drive towards drive towards zero emission transport
- implements policy changes to reflect a recent written ministerial statement about lorry parking and a new section on the spacing of freight facilities
- includes minor changes to clarify policy in order to address legal issues
- includes changes to remove or amend out of date material

1.3 The Government is not proposing a review of the role of the C02/2013 at this stage. A fuller review of C02/2013 could be required in due course, depending on the implementation of the Government's proposals for wider reform of the planning system.

### **2. Overall comments**

2.1 The consultation marks a change of emphasis from mitigation via highways measures towards promotion of sustainable and non-highway transport interventions, which is welcomed.

2.2 The move away from transport planning based on predicting future demand to provide capacity ('predict and provide') to planning that sets an outcome communities want to achieve and provides the transport solutions to deliver those outcomes (sometimes referred to as 'vision and validate') is welcomed. This accords with the approach that was adopted to the development of TfSE's Transport Strategy.

2.3 There is potential for those parts of the guidance that relates to National Highways involvement in "signing off" sustainable transport initiatives, to lead to conflict between local planning/transport authorities and National Highways, which could delay the planning process. Another key issue is the way in which the guidance will be interpreted particularly where it allows for a considerable degree of



subjectivity and there is always a risk of it being applied inconsistently. This is an issue which may require further attention is a fuller review of the guidance. There are also a number of apparent inconsistencies in the guidance which are highlighted in the responses to the consultation questions set out below.

### 3. Response to consultation questions

#### **Q1. Do you agree or disagree with the changes proposed in the introduction section?**

<u>Para. 6 states:</u>	National Highways "...will support initiatives that reduce the need to travel by private car and enable the necessary behavioural change to make public transport, cycling and walking the natural first choice for all who can take it."
Response:	We welcome the change of emphasis away from the sole focus on preserving the role of the strategic highway network. The paragraph could also be enhanced to include greater emphasis upon land-use planning to provide mixed-use and higher density development, better integrated with existing communities, which reduce the need for vehicular travel.
<u>Para 12. States:</u>	"Development in the right places and served by the right sustainable infrastructure delivered alongside or ahead of occupancy should have no significant impact on the SRN"
Response:	We agree with principle but caution the wording - local impacts of sustainable development could possibly be considered "significant"- but not "severe"- this is pertinent to Environmental Assessment significance criteria and NPPF Para. 111 which states:  "Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe."
<u>Para 15.</u>	Specifically focuses on the transport decarbonisation plan and the move away from 'predict and provide' to 'vision and validate'.
Response:	As set out above , we welcome the change in approach as the TfSE's Transport Strategy advocates this approach
<u>Para 17 states</u>	National Highways "will support development promoters and local authorities in applying the principles of Manual for Streets and the National Design Guide on Movement, in particular to ensure that well considered parking, servicing and utilities infrastructure for all users is incorporated into development proposals."
Response:	We agree with the principle, but caution whether this would mean National Highways will become drawn into developing and commenting upon the detail of Local Plan policies and

	development control decision making. This should be retained at the local planning and transport authority level to avoid delay in Local Plan and development control processes, especially considering available resource
--	--

**Q2. Do you agree or disagree with the changes proposed in the new connections and capacity enhancements section?**

Para 22 states:	National Highways "...will adopt a graduated and less restrictive approach to the formation of new connections on the remainder (i.e. non high-speed traffic elements) of the SRN, determining each case on its own merits."
Response:	We welcome the differentiation in policy applicable for urban SRN where sustainable development is most likely to come forward.

**Q3. Do you agree or disagree with the changes proposed in the engagement with plan-making section?**

Para 30 states:	"...there cannot be any presumption that such infrastructure [new connections or capacity enhancements] will be funded through a future RIS"
Response:	The principle may be reasonable but caution that the wording does not make it clear whether the development of schemes can be funded through RIS funding.
Para 34 states:	National Highways "can review measures that would help to avoid or significantly reduce the need for additional infrastructure on the SRN where development can be reasonably delivered through identified improvements to the local transport network, including sustainable travel choices, such as walking, wheeling, cycling, public and shared transport."
Response:	We agree with principle but caution whether this would mean National Highways will become drawn into developing and commenting upon detail of Local Plan policies, and development control decision making, that should be retained at the planning and transport authority level to avoid delay in the local plan and development control process, especially considering available resource.

**Q4. Do you agree or disagree with the changes proposed in the engagement with decision-taking section?**

Para 44 states:	“National Highways expects development promoters to enable a reduction in the need to travel by private car...”
Response:	We caution that this potentially puts National Highways in the role of arbiter of acceptability of sustainable transport strategies for development that may affect SRN and hence development control decision making. This should be retained at the local planning and transport authority level to avoid delay in the local plan and development control process, especially considering available resource.
Para 46 states:	“In highway capacity terms, the impact of development is likely to be acceptable if it can be accommodated within the relevant section (link or junction) of the SRN or does not increase demand for a section that is already operating at, or exceeding capacity.”
Response:	<p>We question whether a small increase in traffic on a section that is “at capacity” could be defined as a “severe impact” in line with NPPF para 111. This has the potential to significantly restrict development across South East England, as “at capacity” could be interpreted in a number of ways in line with the Design Manual for Roads and Bridges (DMRB), with significant proportions of the SRN being potentially defined as being “at capacity”. Also, this paragraph seems to ignore the potential for area-wide sustainable travel or demand management initiatives to reduce background vehicle flows, which could result in links currently perceived to be “at capacity” being transformed into links with spare capacity to accommodate new development.</p> <p>This also appears to contradict Para 53. which is compliant with NPPF and states:</p> <p>“Where a Transport Assessment agreed by the Company indicates that a development would not significantly impact the SRN, new infrastructure will not be required. However, where this assessment indicates that a development would have an unacceptable safety impact or severe impact on the SRN, the developer must identify when, in relation to the occupation of the development, transport improvements become necessary”.</p>
Para 55 states:	“...may become apparent that a different form of intervention would better address cumulative development impacts than the option(s) already identified through the plan-making process. In this situation, the Company will work with the local planning authority and development promoter(s) to explore a cost sharing mechanism or the phased delivery of a more comprehensive scheme.

Response:	We welcome this inclusion, but Para 46 as currently written potentially undermines the intent.
Para 58 &59 state:	<p>Para 58 - "for reasons of safety, liability and maintenance, any physical infrastructure that is necessary to mitigate the environmental effects of development must be located outside the highway boundary of the SRN"....</p> <p>Para 59 "An exemption to the requirement to site structures outwith highway land can be made for those owned and provided by the Company, and otherwise only in exceptional circumstances where there is no practicable alternative and safety is not compromised."</p>
Response:	The primary consideration for siting physical environmental mitigation infrastructure should be to locate it where it is likely to be most effective and least environmentally detrimental. For instance, in the case of mitigating a development from road noise where the SRN is on an embankment, then the most effective location for a noise barrier will be at the top of the embankment within highway land. Paragraphs 58 and 59 need to be redrafted accordingly.

**Q5. Do you agree or disagree with the changes proposed in the special types of development section?**

No response.

**Q6. Do you agree or disagree with the changes proposed in the roadside facilities section?**

Para. 80 to 83	Address spacing of freight facilities in recognition of existing shortages. This includes reduced maximum spacing between services that provide for lorry parking in areas of identified need
Response:	TfSE agrees with the changes to the provision of freight facilities to address existing shortages in provision.
Para. 110 to 113	Set out provisions for zero emission and hybrid vehicles at roadside facilities.
Response	TfSE supports the proposed changes

**Q7. Do you agree or disagree with the changes proposed for annex A?**

**Q8. When should the new requirements in annex A apply from?**

Annex A	Sets out the detailed requirements for roadside facilities including those for freight and zero emissions vehicles.
Response:	TfSE agrees with the changes proposed for Annex A which, given the existing shortage of freight facilities, should be introduced as soon as reasonably practical.

**Q9A. Are the facilities and parking currently required by the circular sufficient or not sufficient to enable utilisation of longer and heavier vehicles?**

No response.

**Q9B. Please explain your answer.**

**Q10. What additional facilities and/or parking could be required to enable utilisation of longer and heavier vehicles? Please explain your answer.**

No response.

**Q11. In what format would you like to see the circular published moving forward?**

The publication of the circular should follow existing Government Guidance on publishing documents that was updated on 5 August 2022.

**Q12. Do you agree or disagree the proposed objectives meet our obligations under the Equalities Act 2010?**

No response

*Draft TfSE response for consideration at TfSE Partnership Board  
on 26 September 2022*

# Rail Freight Growth Target

**A Call for Evidence on designing and delivering rail freight  
growth target options for the rail network**

Response Template

## Responding to this Call for Evidence

**This Call for Evidence launches on 5th July 2022 and will be open for 12 weeks, until 27th September 2022.**

We recommend you read the Call for Evidence Document in full before submitting your response and strongly encourage you to respond using the online survey. The Call for Evidence Document and the online survey can be found at: [Rail Freight Growth Target | Great British Railways Transition Team \(gbrtt.co.uk\)](#).

If you are unable to use the online survey, you can respond by completing this form and sending it via email to [RFGTcallforevidence@gbrtt.co.uk](mailto:RFGTcallforevidence@gbrtt.co.uk).

You may respond as an individual or on behalf of an organisation or organisations (please let us know all the organisations you are responding on behalf of).

We have grouped the questions into several themes. You can answer as many of them as are of interest and relevance to you or your organisation. Please provide as much evidence, based on credible data or verifiable qualitative information (such as examples and case studies), as you can to support your submission.

There are two parts to this call for evidence:

- Part One: Meeting customers' needs, and
- Part Two: Designing a growth target.

Part One is primarily aimed at organisations that have an active role in the movement of freight. These questions are intended to supplement our current understanding of market demand and forecast growth, and develop an understanding of your perception of engaging with the rail industry.

The questions in Part Two are to seek your views on how important rail freight growth is to you or your organisation, and how a rail freight growth target can be designed and implemented to achieve the desired outcome.

The most valuable responses will show how we can support rail freight growth in the context of our five strategic objectives over the short-term (the next five years), the medium-term (the next 10 years), and the long-term (the next 30 years). Respondents are welcome to consider the full range of potential measures or interventions, particularly those which complement private sector activity. Recognising the financial constraints the railway faces, any proposals that require public investment, should set out the cost and benefits, highlight the tensions and trade-offs, and evidence the efficiencies such a proposal would realise.

## About you

1. What is your name? *(required)*

*Mark Valleley*

2. What is your email address? *(required)*

*Mark.valleley@eastsussex.gov.uk*

3. What is your job title? *(required)*

*Technical Lead*

4. Are you responding as an individual or on behalf of an organisation? *(required)*

Individual

Organisation

Click or tap here to enter text.

## About your organisation

5. What is the name of your organisation? *(required)*

*Transport for the South East (TfSE)*

6. What is the role of your organisation? *(required)*

*Sub-national Transport Body (STB)*

7. What region(s) does your organisation currently operate in? *(required)*  
*(please select all that apply)*

<input type="checkbox"/> East Midlands (England)	<input checked="" type="checkbox"/> South East (England)
<input type="checkbox"/> East of England	<input type="checkbox"/> South West (England)



<input type="checkbox"/> London	<input type="checkbox"/> Yorkshire and the Humber
<input type="checkbox"/> North East (England)	<input type="checkbox"/> Wales
<input type="checkbox"/> North West (England)	<input type="checkbox"/> West Midlands (England)
<input type="checkbox"/> Scotland	

8. Are you a current rail industry stakeholder? *(required)*

Yes

No

9. Which of these options best describe the organisation you work for or are representing? *(required)*

<input type="checkbox"/> Manufacturer that uses rail to transport goods	<input checked="" type="checkbox"/> Sub National Transport Body
<input type="checkbox"/> Manufacturer that does not use rail to transport goods	<input type="checkbox"/> Trade Body
<input type="checkbox"/> End-customer that uses rail to transport goods	<input type="checkbox"/> Terminal Operator (with rail traffic)
<input type="checkbox"/> End-customer that does not use rail to transport goods	<input type="checkbox"/> Terminal Operator (without rail traffic)
<input type="checkbox"/> Retailer that uses rail to transport goods	<input type="checkbox"/> Retailer that does not use rail to transport goods
<input type="checkbox"/> Freight Operating Company	<input type="checkbox"/> Port Operator (with rail traffic)
<input type="checkbox"/> Train Operating Company	<input type="checkbox"/> Port Operator (without rail traffic)
<input type="checkbox"/> Third-Party Logistics Company that uses rail to transport goods	<input type="checkbox"/> Government body or department
<input type="checkbox"/> Third-Party Logistics Company that does not use rail to transport goods	<input type="checkbox"/> Rail infrastructure manager (current or prospective)
<input type="checkbox"/> Transport Authority	<input type="checkbox"/> Rail Industry Regulator
<input type="checkbox"/> Local Council	<input type="checkbox"/> Customer Representative Body

Other (please specify):

Click or tap here to enter text.

# Part One: Meeting customers' needs

## Understanding your views on the rail industry

**Note:** Please only answer question i if you do not currently use rail to transport goods.

i. Have you used rail to transport goods in the past?  
(please select only one item)

Yes

No

**Note:** Please only answer question ii if you do not currently use rail to transport goods. If you do move goods by rail, please move to question iii.

ii. Why does your organisation not use rail to transport goods?  
(please select all that apply)

<input type="checkbox"/> Rail network capacity	<input type="checkbox"/> Reliability (compared to other transport modes)
<input type="checkbox"/> Rail network capability	<input type="checkbox"/> Origin locations are too variable
<input type="checkbox"/> Rail terminal connectivity	<input type="checkbox"/> Destination locations are too variable
<input type="checkbox"/> Cost (compared to other transport modes)	<input type="checkbox"/> Volume of goods is too small for a whole train
<input type="checkbox"/> Flexibility (compared to other transport modes)	<input type="checkbox"/> Difficult to understand how to use rail
<input type="checkbox"/> Do not know who to contact to explore using rail	<input checked="" type="checkbox"/> Other (please specify)

Other (please specify):

*It is not part of our remit to transport goods.*

- iii. What are the key reasons why your organisation does not transport a larger tonnage of freight by rail?  
(please select all that apply)

<input type="checkbox"/> Rail network capacity	<input type="checkbox"/> Reliability (compared to other transport modes)
<input type="checkbox"/> Rail network capability	<input type="checkbox"/> Origin locations are too variable
<input type="checkbox"/> Rail terminal connectivity	<input type="checkbox"/> Destination locations are too variable
<input type="checkbox"/> Cost (compared to other transport modes)	<input type="checkbox"/> Volume of goods is too small for a whole train
<input type="checkbox"/> Flexibility (compared to other transport modes)	<input checked="" type="checkbox"/> Other (please specify)

Other (please specify)

*It is not part of our remit to transport goods.*

- iv. What is your perception of working with the rail industry?  
(please share any experiences or case studies)

*TfSE has a very positive and constructive working relationship with various parts of the industry, including Network Rail (Southern and Wales & Western), TOCs, RDG, ROSCOs and others. TfSE and Network Rail have collaborated on (and provided data for) each other's strategic work such as TfSE's Transport Strategy (2020) and draft Strategic Investment Plan (SIP, 2022); and NR area studies and route studies (eg Paddington-Reading, Reading Area, Solent-Midlands Freight and more).*

### **Understanding current and future market demand**

- v. Do you see the greater use of rail freight as a viable solution for reducing greenhouse gas emissions in your operation?  
(please select only one item)

Yes

No

If yes, please describe the potential role you think rail should play in your supply chain:

*For supply chain movements operating in, to/from or across the TfSE area, rail has a major potential role to deliver more sustainable freight movement than the equivalent by road – with outcomes including reduced CO2, reduced road traffic, improved air quality, improved safety and, on some routes, faster journey times (including by avoiding road congestion*

hotspots). Rail freight can also be used to reduce the pressure on availability of road haulage drivers. The potential for more use of rail in supply chains is set out in more detail in TfSE's Freight, Logistics and Gateways Strategy – see

- vi. Are there parts of your supply chain you would like to transfer to rail?  
(please select only one item)

Yes

No

If yes, please outline what parts of the supply chain and where these are geographically

Click or tap here to enter text.

- vii. Does your organisation currently move goods by road in a single leg journey that exceeds approximately 100km on a regular basis?  
(please select only one item)

Yes

No

If yes, please provide further detail about geographic location and frequency:

Click or tap here to enter text.

- viii. If the rail industry was not constrained (eg by capacity, driver resource or asset availability), how much extra freight tonnage could be moved by rail each year?

Please specify where and why suppressed demand exists on the rail network:

*In TfSE's area, considerably more freight tonnage could be moved by rail if those constraints were overcome. Another constraint, not mentioned here, is the available loading gauge on different routes (precluding operation of inter-modal containers, for example) – which also needs to be addressed progressively across the network. Line capacity constraints both within and beyond the TfSE area suppress the potential to meet more demand for rail-based freight, including: for freight links that require trains to circuit London on the West London Line and North London Line (or Gospel Oak-Barking); Woking; Windmill Bridge Junction and lines through East Croydon; routes through and around Southampton; Basingstoke-Reading; Reading-Paddington; and Lewisham, amongst others. Outside the TfSE area, there are other capacity constraints that suppress demand for Solent-Midland freight services, as identified in the joint route study between Network Rail and National Highways.*

- ix. Please describe how the total annual tonnage of freight moved by your organisation (across all transport modes) is likely to change over the next 5 years, 10 years, and 30 years.

*[Please specify if any demand drivers have been identified]*

5 years:

*Not applicable.*

10 years:

*Not applicable.*

30 years:

*Not applicable.*

### **Understanding the opportunities and challenges to rail freight growth**

- x. Do any of the terminals or facilities you presently occupy have a rail-connection but do not receive rail traffic?

*(please select only one item)*

Yes

No

If yes, please specify where:

*TfSE does not occupy any terminals or facilities.*

- xi. Are there any terminals or facilities you presently occupy adjacent to or near the railway that are not currently rail-connected?

*(please select only one item)*

Yes

No

If yes, please specify where:

Click or tap here to enter text.

xii. What are the key opportunities for the credible, commercially viable growth of rail freight usage in the next 5, 10, and 30 years?

5 years:

*Parcels and higher value, low bulk goods – an opportunity to repurpose 3rd rail passenger stock (such as Networkers) as it comes off lease.*

10 years:

*Trade will increase through the port of Southampton, spurred by current port expansion plans with any decline in trade with mainland Europe and increase with the rest of the world. Big opportunity for rail freight.*

30 years:

*Increasing use of rail freight to deliver mode shift and achieve carbon reduction targets.*

### Understanding your priorities and future engagement

xiii. Please rank the following in order of importance from 1 (low importance) to 5 (high importance) for your organisation: decarbonisation; cost; journey time; reliability; flexibility.

**Note:** please make sure you use all five numbers and do not use a number more than once (e.g. you cannot score decarbonisation and cost both five).

	1	2	3	4	5
Decarbonisation	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Cost	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Journey Time	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Reliability	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Flexibility	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- xiv. Would you welcome further engagement with the rail industry to begin looking for potential solutions to establish a rail service?  
(please select only one item)

Yes

No

- xv. Do you have any other comments you would like to add to support your response to Part One?

*TfSE's Freight, Logistics and Gateways Strategy identifies a clear future role for rail-based freight to contribute to economic growth in the TfSE area, deliver mode shift away from road-based freight and contribute to supply chain decarbonisation. The strategy can be found at: [https://tfse.org.uk/app/uploads/2022/05/TfSE\\_FLAGS\\_Report\\_v1.71.pdf](https://tfse.org.uk/app/uploads/2022/05/TfSE_FLAGS_Report_v1.71.pdf). Section 3 of the strategy identifies the current and future capability of the rail network for rail freight movement. Opportunities must be taken to complete short gaps in overhead electrification, especially to provide better links between key rail freight corridors in/around London. Seaports should have rail links restored and used where feasible (eg at Sheerness). Opportunities of potential new rail freight interchanges in the TfSE area need to be explored and exploited. More work needs to be done to increase rail freight capability to and from Heathrow. TfSE is keen to collaborate with GBR on opportunities to increase opportunities for rail freight on the network, encouraging and growing demand, and delivering a more decarbonised supply chain.*

## Part Two: Designing a growth target

### Understanding your views on rail freight growth

- xvi. On a scale of 1 (low importance) to 5 (high importance), how important is rail freight growth to you or your organisation?  
(please select only one item)

1	2	3	4	5
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

- xvii. On a scale of 1 (highly ineffective) to 5 (highly effective), how effective do you think a growth target will be in incentivising rail freight growth?  
(please select only one item)

1	2	3	4	5
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

- xviii. How do you think a target can incentivise rail freight growth?  
(Please consider any opportunities, challenges, benefits and disbenefits)

*Targets for growing rail freight, suitably specified, will be an incentive to GBR to work to resource and enable that growth – rail freight operations can and would be measured and monitored; and GBR will be held to account by both DfT and ORR for delivering on their policies and related requirements.*

### Understanding your views on measuring a growth target

- xix. Of the options described in Table 1 (see Page 13), what do you think is the best metric for measuring a future growth target?  
(please select only one item)

Economic Value	Modal transfer	Carbon reduction	Freight moved	Freight lifted	Freight distance travelled	Total freight trains operated
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- xx. Are there any other metrics that you would suggest for measuring a future rail freight growth target?

*GBR's primary performance target for freight growth needs to combine increases in Freight Moved (tonne km) and more Carbon Reduction (tonnes of CO<sub>2</sub>) – highlighting the aims of increasing the amount of freight on the railway and of decarbonising it. In other words, despite increases in rail freight tonne miles, CO<sub>2</sub> generated by freight trains should be reducing. Increasing the total Economic Value of goods moved on the railway is also a*



*beneficial target – which would focus GBR’s attention on prioritising loads that either are of more economic value and/or facilitate economic growth. Modal Transfer is less under GBR’s control, but monitoring this and other indicators in Table One will provide essential intelligence/evidence.*

- xxi. Over what timeframe should the growth target be set?  
(please select only one item)

Control Period 7 (2024 – 2029)	End state to 2030 (with intermediate targets)	End state to 2030 (without intermediate targets)	End state to 2050 (with intermediate targets)	End state to 2050 (without intermediate targets)	Other (please specify)
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Other (please specify):

*TfSE’s freight strategy runs to 2035. Setting absolute ‘end state’ targets for rail freight to 2035 (or perhaps to 2030 to begin with) would be a reasonable period during which the railway should be incentivised to maximise rail freight growth (while decarbonising rail freight movement) within current constraints and capacity of the existing rail network. After that, it is reasonable to expect a need to invest in major infrastructure enhancements to free up network capability for more rail freight growth. Intermediate targets should be set, if possible, every 5 years. This will focus attention on growing rail freight in the context of planning for activities and interventions in the next Control Period.*

If you chose an answer with an end state (with or without intermediate targets), please specify what you think the end state should be and why:

Click or tap here to enter text.

- xxii. Across what geography should the rail freight growth target apply?

Rail network	Separate targets for the Regional Divisions of GBR	Other (please specify)
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Other (please specify):

Click or tap here to enter text.

xxiii. Should the rail freight growth target be designed to cover all market sectors, or should there be several market-specific targets?

*(please select only one item)*

One target

Several market-specific targets

### **Understanding your views on delivering a growth target**

xxiv. How can the public and private sector work together better to ensure a future growth target is delivered?

*TfSE, Network Rail, freight industry bodies and others have been collaborating successfully on a range of topics – not least on TfSE’s own work, including the transport strategy, draft strategic investment plan and freight strategy. The freight strategy identified an action area to address public sector “freight blindness”, which evidences itself in a range of ways. For TfSE, the challenge will be to address the different functions that different authorities have that influence freight and logistics in their own area and beyond. TfSE is planning to relaunch its Freight Forum in early 2023, which would offer GBR an excellent link with parts of the freight and logistics industry and with local authorities, LEPs etc. TfSE is very keen to continue to collaborate with GBR on a wide range of issues that will be of importance to both organisations, building on the strong links that have already been established between TfSE and Network Rail.*

xxv. What is needed from the supply side of the rail industry (commercial operators, GBR and Government) to support the growth of rail freight?

*[Please outline any concepts or actions that are needed and include the associated benefits and costs]*

*Industry needs certainty to free up investment to improve the way its logistical needs can be met. The railway needs to overcome the images and narratives around its freight capabilities – that rail freight is slow, requires huge investment in infrastructure, is unreliable (will a consignment be delayed – or get there at all?), has high operating costs etc. The railway needs to look carefully at how to bring costs down and how to operate dependably (including use of diversionary routes). Some freight customers will want to come to the*

*railway because they want to reduce their environmental impacts. Some will require help to invest in infrastructure that gives them physical access to the railway. The government may wish to apply policy-led incentives that makes rail freight a more desirable product – whether using ‘carrot’ or ‘stick’ approaches. More information is available in TfSE’s freight strategy and its supporting evidence base.*

xxvi. What impact would these concepts or actions have on rail freight growth?

Actions that bring more freight customers to the railway and encourages existing customers to use the railway more will grow the demand for rail freight.

xxvii. What are the potential trade-offs (eg capacity or access) to deliver these concepts or actions?

*The rail network has a range of inherent issues around capacity, operational resilience and cost of accessing the network. These and other constraints will limit the amount that rail freight capability can grow. The point has already been reached on some lines, and will easily be reached on others before long, where the numbers and types of trains reach the limit of the railway’s capability. At or before that point is reached, assessment will need to be made of the relative value of current and proposed use of the train paths on offer. For some routes, business cases should be drawn up for potential capacity enhancements. A policy (with targets) for rail freight growth must recognise that the railway’s capacity for that growth is finite.*

xxviii. Which one of these concepts or actions would be most significant from a costs and benefit perspective?

*Consideration could be given (on a route by route basis) to identifying the potential economic value (and contribution to economic growth) of different alternative sets of train path options for a rail corridor on a congested part of the network. That assessment may be more readily achieved by route corridor (ie on links between network ‘nodes’) rather than at [congested] nodes themselves. Such an assessment could usefully inform the railway’s thinking about how the network is used, although economic value is not the only determinant in deciding priorities for allocating paths for different types of service/trains.*

xxix. Do you have any other comments you would like to add to support your response to Part Two?

*TfSE, in common with other STBs, will welcome opportunities to collaborate with GBR on growing rail freight, as well as other issues.*

**THERE ARE NO MORE QUESTIONS**

Title	Metric	Description	Pros	Cons
Economic value	Value of freight £x	To measure the total economic value of all the freight trains that operate	<ul style="list-style-type: none"> <li>○ Able to measure economic value of freight which could be used to make trade offs and enable enhanced decision making about use of capacity.</li> <li>○ Able to demonstrate comparative economic value by commodity</li> </ul>	<ul style="list-style-type: none"> <li>○ Could be difficult to measure and would require new methodology</li> <li>○ Not currently used or reported by the economic regulator</li> </ul>
Modal transfer	Lorry movements avoided	To measure the total number of lorry movements that have been prevented	<ul style="list-style-type: none"> <li>○ Able to measure carbon savings accurately and links to Net Zero carbon reduction targets</li> <li>○ Able to demonstrate progress in delivering modal transfer for the addressable road market</li> <li>○ Able to capture new to rail traffic</li> </ul>	<ul style="list-style-type: none"> <li>○ To capture additional growth in demand (beyond what runs today), a process would be required to map the HGVs that would otherwise have run (across all commodity types)</li> <li>○ Does not capture modal transfer from other transport modes (eg from air)</li> </ul>
Carbon reduction	Carbon tonnes saved	To measure the total amount of carbon saved by moving goods by rail instead of other modes	<ul style="list-style-type: none"> <li>○ Able to measure carbon savings accurately and links to Net Zero carbon reduction targets</li> <li>○ Can be linked to lorry movements avoided</li> </ul>	<ul style="list-style-type: none"> <li>○ To capture the carbon savings of additional freight volumes (beyond what runs today), a process would be required to calculate the saving based on what would otherwise have run (this would be needed across different transport modes)</li> <li>○ Target could be achieved without increasing the volume of freight moved by rail through the greater use of bio-fuels or because of future decarbonisation of the rail network</li> </ul>
Freight moved	Net Tonne Kilometres	To measure both the volume of goods and the distance travelled	<ul style="list-style-type: none"> <li>○ Able to capture both short distance flows moving heavy goods (e.g. Construction materials) and longer distance flows carrying comparatively lighter goods (e.g. Intermodal containers)</li> </ul>	<ul style="list-style-type: none"> <li>○ Not the best representation of short distance and lighter-weight cargo</li> <li>○ Not able to demonstrate new to rail traffic easily</li> </ul>
Freight lifted	Tonnes	To measure only the volume of goods transported	<ul style="list-style-type: none"> <li>○ Able to capture traffic flows in bulk markets over both short and long distances</li> </ul>	<ul style="list-style-type: none"> <li>○ Not able to appropriately capture the movement of lighter-weight goods (e.g. parcels) or comparatively lighter-weight goods (e.g. Intermodal containers) which can travel long distances</li> <li>○ Not able to demonstrate new to rail traffic easily</li> </ul>
Freight distance travelled	Kilometres	To measure only the distance the goods are moved	<ul style="list-style-type: none"> <li>○ Able to capture the total distance travelled by rail, regardless of the weight of goods</li> </ul>	<ul style="list-style-type: none"> <li>○ Not able to appropriately capture the movement of bulk goods with considerable tonnage volumes that travels over short distances</li> <li>○ Not able to demonstrate new to rail traffic easily</li> </ul>
Total freight trains operated	Trains per annum	To measure the total number of additional freight trains that ran	<ul style="list-style-type: none"> <li>○ Able to capture additional freight trains that operate on the network, regardless of weight or distance</li> <li>○ Able to capture new to rail traffic</li> </ul>	<ul style="list-style-type: none"> <li>○ Could lead to erroneous behaviours of running trains partially loaded (which the metric may not be able to capture)</li> <li>○ May not incentivise the industry to identify operational efficiencies to run longer and heavier loads, or to maximise the trainload capacity of existing services</li> </ul>

Table 1: Examples of the pros and cons of potential rail freight growth target metrics

## Next steps

A summary report of the responses will be published in autumn 2022. It will summarise the key themes, findings, and next steps.

The responses to both parts of this call for evidence will be supplemented by economic modelling and lessons learned from the development of other rail freight growth targets, which will be factored into the next stage of this work. The ranges of scenario assumptions and timeframes of the options are still to be determined. The Freight Operating Companies and the Rail Delivery Group will continue to be consulted throughout this process, to inform the development of credible and deliverable options. We will present rail freight growth target options to the Secretary of State later this year.

Thank you for your engagement and input. If you have any questions about this Call for Evidence, please contact [RFGTcallforevidence@gbrrt.co.uk](mailto:RFGTcallforevidence@gbrrt.co.uk). We welcome your continued engagement in this process.

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