

9 January 2019

1 Grangeways  
Brighton  
BN1 8XN

**BY EMAIL TO: [tfse@eastsussex.gov.uk](mailto:tfse@eastsussex.gov.uk)**

## **Transport Strategy for the South East consultation**

On behalf of Bricycles, CTC-SE and as a local Cycling UK representative for Brighton and Hove, I am responding to your consultation.

**We were shocked to see that your preferred scenario, the “Sustainable Route to Growth” would result in -7% cycling and walking. It is even worse to read that this would be in addition to the -6% drop in cycling and walking predicted by the “Business as Usual” baseline. If you pursue this strategy, you will lose all the health and environmental benefits that cycling and walking bring. The strategy must be adjusted so that active travel is massively increased, not decreased.**

Q6. We support your intention to end the discredited traditional transport planning approach of ‘predict and provide’, but we want to see a strategy that brings about an enormous uptake of active travel and a switch from the use of the private motor car to public transport.

Q7. The draft Transport Strategy advocates a move from ‘planning for vehicles’ to one based on ‘planning for people’ and ‘planning for places’. We strongly agree with the “Overarching approach – planning for people and places” and reducing the need to travel, (P. vi, Executive Summary). This needs to start immediately, but the timeline is not stated.

Q8. We do not support your preferred ‘Sustainable Route to Growth’ scenario. ‘Sustainable future’ needs to be given more consideration as it is the least likely to cause worsening of congestion, health, transport poverty and the economy.

Your preferred strategy is at odds with the Government’s Cycling and Walking Investment strategy which aims to double cycling from 800 million ‘stages’ in 2013 to 1.6 billion in 2025. The strategy period for the South East extends until 2050 so there is plenty of time to go far beyond doubling the level of cycling by 2050 and to aim for something much more ambitious **such as quintupling the numbers cycling.**

It is very important for the economy, health and environmental reasons that land-use and transport planning are better integrated. It is also very important that we see a shift away from private cars towards more sustainable travel modes; Targeted demand management measures, with more mobility being consumed on a ‘pay as you go basis’ and that the transport system delivers a cleaner, safer environment.

The strategy does not mention children or their need to travel, yet under-16s make up 19% of the UK population (12 million children). If children can get to school and home safely and independently e.g. by walking, cycling and public transport, parents would not have to “do the school run” which accounts for up to a quarter of the traffic on the roads at peak times with 34% of UK children being transported to school by car.

Q9. Our additional comments about your approach to developing the draft Transport Strategy are spread throughout this letter.

We strongly disagree that “New roads, improvements or extension of existing ones should be prioritised in the short term...” We need an immediate reassessment of all plans and projects in the light of the climate emergency, poor air quality and growing climate change emissions from the transport sector. Demand management policy interventions should be made as soon as the strategy is adopted and should not be “a longer term goal” (P. xii, Executive Summary).

Any reputable transport strategy must distinguish between walking and cycling. Although these modes have some synergy, they are distinct and require specific planning and infrastructure. Too often walking and cycling have been lumped together and then sidelined in transport and land use planning. We must see an end to poor quality infrastructure for cycling and walking such as narrow and obstructed paths and lanes severed by traffic and inadequate “shared” facilities which neither group find satisfactory.

Q10 - 11. Regarding the case for continued investment in the South East’s transport system, we need to be assured that investment will be used for sustainable transport and not result in bigger roads and airports.

An additional point is that sustainable tourism could be a growth area e.g. walking in the South Downs National Park, visiting local attractions, cycling using National Cycle Routes and on/off-road, use of the ferry port or rail to Europe etc. would contribute to the economy and would benefit from investment.

Q12. The vision omits reference to health and wellbeing. The phrase “offer seamless door to door journeys” does not sound like active travel. The ambition to “reduce the need to travel” needs to be reflected in the vision. We would not support the reference in the vision to “the global marketplace” if this is going to be taken as support for the expansion of aviation, increased air travel or increased air/road miles.

There is a general lack of emphasis on health in the strategy. Although health is mentioned as a “strategic goal” within “Society” the proposed improvement is not quantified and sounds vague. Health is a big enough area to merit a separate strategic goal of its own. Under “social priorities” (P. xiii, Executive Summary) there is a statement about “a network that promotes active travel and active lifestyles to improve our health and wellbeing”. This sounds promising but needs explanation. We need a much more solid description e.g. a network of safe, comfortable, attractive, coherent, direct and convenient routes built to high quality standards (e.g. the London Cycling Design Standards) that enable people of all abilities to travel actively using appropriately designed infrastructure for walking, cycling or wheelchair use. These routes should be adaptable to scale up for greater use and connectivity.

There is a wealth of evidence about the connection between active travel and health to be found in evidence-based guidance and other documents published by NICE such as:

1. [Physical activity](#)
2. [Walking and cycling](#)
3. [Physical activity and the environment \(NG90\)](#)
4. [Physical activity: walking and cycling \(PH41\)](#)
5. [Unintentional injuries on the road: interventions for under 15s \(PH31\)](#)
6. [Road safety](#)
7. [Transport and health](#)
8. [My Best Move - GP training for physical activity for patients with Long Term Conditions](#)

Active travel and physical activity improves mental health as well as physical health. Contrary to assumption, a proportion of disabled people cycle and many of them describe cycling as easier than walking. Please refer to “Wheels for Wellbeing” who are championing the rights of disabled cyclists and campaigning to make cycling more inclusive: <https://wheelsforwellbeing.org.uk/campaigning/guide/>

Cycling has the potential to become much more popular and cycling journeys can become longer for more people due to the enthusiastic uptake of electric cycles in Europe and the UK. E-cycling can replace car driving for a whole new group of people, including the older and less fit, who previously ruled out fully human-powered cycling.

We strongly support your statement about “Achieving environmental sustainability” that “Transport for the South East strongly believes the South East must reach a point where future economic growth is decoupled from damaging environmental consequences. Attractive, sustainable alternatives to the car and road freight must be provided, coupled with demand management policies. Land use planning and transport planning (along with planning for digital and power technologies) must also become more closely integrated.” (P.ix, Executive Summary).

Regarding the “Key principles for achieving our vision” we recognise the environmental damage that economic growth has brought about. What is crucial is that any future “balance” between the two does not simply permit more environmental damage.

Q14. We strongly agree with the second and third goals in the draft Transport Strategy i.e. to “improve health, safety, wellbeing, quality of life, and access to opportunities for everyone” and to “protect and enhance the South East’s unique natural, built and historic environment, and tackle climate change together”

We tend to disagree with “Improve productivity and attract investment to grow our economy and better compete in the global marketplace” because there is no mention of sustainability and because perpetual economic growth is questionable.

Q15-16. We strongly agree with all the social and environmental priorities. Again there is not enough emphasis on health.

We need to plainly acknowledge and act upon KSIs (Killed and Seriously Injured) road traffic collision statistics (particularly non-motorised road users), the role of poor infrastructure and lack of enforcement of traffic law rather than list the euphemism of “Road safety hotspots”. (P.xi, Executive Summary). Fear of traffic is the major disincentive to active travel, with 62% of UK adults saying it is too dangerous to cycle on the roads. We regularly see cyclists killed and seriously injured on East and West Sussex roads, including some known personally to me. The record is not good. We urgently need better cycling and walking infrastructure.

The Government’s intention to fund new roads needs critical appraisal by TfSE. Many projects will be counter to sustainable growth.

Q17. Regarding the principles for identifying key transport issues and opportunities, we strongly support the last 4 i.e. Achieving environmental sustainability, Planning for successful places, Putting the user at the heart of the transport system and Planning regionally for the short, medium and long-term. We cannot support the first one, “Supporting sustainable economic growth, but not at any cost” because this may be taken to support destructive road schemes and developments.

In the section “Planning Regionally for the Short, Medium and Long Term” we are interested to know more about how “This Transport Strategy seeks to build on the excellent work of Transport for the South East’s constituent authorities and other planning authorities in the South East.” Whilst some work in the South East has been excellent, there is a worrying history of poor planning and transport decisions linked to property speculation with little concern for people or the environment. Indeed, the Bexhill-Hastings Link Road is an example of a destructive new road of low benefit to cost which was pushed through an East Sussex valley by the County Council despite protests by residents and respected organisations. Coming through the planning pipeline now in West Sussex is the New Monks Farm development which involves building on a flood plain at Shoreham by Sea, an upgrade to the A27, a new bigger roundabout and the closure of a cycle crossing, to be replaced with only substandard cycling facilities. Flawed planning proposals and plans need to be held to higher standards as TfSE appears to be promising, but this change will need enormous resolve.

In line with this, the highest priority in the strategy should be to reduce road traffic and the space devoted to motor vehicles, particularly private cars. This would reduce congestion, improve air quality and reduce carbon emissions. The reclaimed road space can be used for walking and cycling and the public realm with a subsequent improvement in the many environmental and human health problems that motor traffic brings about. We support the vision to be “a leading global region for net-zero carbon”. However, this should be achieved as soon as possible and well before 2050. Yet the preferred strategy would increase traffic by over 8% when we actually need at least a 20% reduction. A move to electric vehicles and greater use of public transport are not enough to meet our carbon reduction targets

Carbon emissions in the transport sector and in new plans and proposals should be assessed and greatly reduced by 2030. New road schemes, the expansion of aviation and other environmentally damaging projects should be halted.

Q18 - 21. Radial, orbital and coastal journeys and all journeys by motor vehicles including electric vehicles increase pollution and cause health problems, even many deaths. The impact of pollution on health is massive. Your response to the key challenges in all areas needs to be in line with the four criteria we support from Q17, i.e. Achieving environmental sustainability, Planning for successful places, Putting the user at the heart of the transport system and Planning regionally for the short, medium and long-term.

Regarding local journeys (P.xi, Executive Summary) the draft strategy should acknowledge the serious lack of local bus services as a challenge. Rural services are non-existent in many places. We have also been unable to find a map of bus services in the draft strategy which is an omission. This is the most important mode for many people.

Apart from "Park and ride" schemes which we **do not** support, we support all your responses to "Local journeys" i.e. investing in infrastructure, funding high quality public transport, improving air quality, prioritising pedestrians and cyclists over motorists, better integrated transport and a real term freeze in fares. Vulnerable road users also need much more protection from HGVs on local roads and town centres.

We strongly support the improvement of rail and bus services, better ticketing, cheaper fares and easier carriage for cycles. We strongly support demand management policies, immediately, not deferred to the longer term. We strongly support increasing the proportion of journeys made by active travel.

Q22 - 25. We support all the social and environmental performance indicators to monitor the progress of the Strategy, but urgent timescales need to be applied. We cannot see any measurement of the passenger uptake on bus or rail. This should be another performance indicator.

The economic performance indicators are more problematic because we are not convinced that unsustainable growth would be eliminated by them. We wonder about the use of "The percentage of allocated sites in Local Plans developed in line with Local Transport Plans." as an indicator. These can still be very unsustainable unless assessed independently. We are pleased to see the Integrated Sustainability Appraisal document accompanying the strategy which appears to address many of our concerns, however we are not in a position to adequately critique it.

Q26. The draft strategy must prioritise low cost, low impact and active travel and quickly produce a doubling of the use of public transport and a reduction in motor car journeys. It must adjust its preferred scenario from the drop in cycling and walking to instead produce a huge increase in these modes e.g. quintupling cycling, so that health, wellbeing and environmental benefits can be realised. Business as usual cannot continue. We urgently need to decarbonise and to reverse the many negative impacts that transport and unsustainable development have had on health, wildlife and the environment.

I would like to receive news and updates from Transport for the South East by email to

[becky.reynolds2@btinternet.com](mailto:becky.reynolds2@btinternet.com)

I'm responding on behalf of community group Bricycles and as a representative of the organisations as stated below c/o the address at the top of page 1.

Yours sincerely,



Becky Reynolds

Campaigns Officer, Bricycles, the Brighton and Hove Cycling Campaign  
[www.bricycles.org.uk](http://www.bricycles.org.uk) [www.facebook.com/Bricycles](https://www.facebook.com/Bricycles) and [twitter.com/Bricycles](https://twitter.com/Bricycles)  
Cycling UK local campaigner, Brighton and Hove [www.cyclinguk.org](http://www.cyclinguk.org)  
Treasurer, CTC-SE (Cyclists' Touring Club, South East region)