

Transport Action Network

Response to:

Transport for the South East's Draft Transport Strategy Consultation

General comments

Welcome:

- The overall vision and direction of the draft strategy, focussing on sustainable transport and quality of life.
- The ambition for net-zero carbon by 2050
- The acknowledgement that electrification of the vehicle fleet won't be enough on its own to achieve the strategy's aims and objectives.

Are concerned about:

- The strategy has no defined pathway to net-zero carbon and no interim targets are provided. These will be essential in meeting this challenge. There is also no mention of the region's carbon budget and the need to keep within it.
- The preferred scenario is highly unlikely to deliver net-zero carbon by 2050. It will lead to an 8% increase in road traffic (over today's figures) when research is suggesting at a minimum, we will need a 20% reduction by 2030.
- The preferred scenario sees a 13% drop in active travel (over today's figures) when there are so many co-benefits, including economic, by increasing numbers walking and cycling.
- The lack of strategic importance attached to active travel which is downplayed by the current way of assessing modal trips. Its necessity in supporting higher levels of bus and train use is also largely ignored.
- The lack of emphasis on the need for far better digital connectivity, particularly in rural areas.

- The Integrated Sustainability Appraisal (ISA), which, while it contains useful information, fails to record important negative impacts of building new roads and makes sweeping statements on health and equalities which are untrue and without any justification.

What needs to happen:

- A new scenario needs to be developed with a broader range of stakeholders. The development of the existing scenarios was flawed – for example the Sustainable Future option (supposedly an extreme scenario) doesn't meet the need to reduce road traffic significantly, so is actually rather modest in ambition.
- There needs to be a moratorium on new roadbuilding. It's not good enough to carry on business as usual for 5 years or more, as currently proposed, as the large number of road schemes will increase traffic and fuel climate change making the achievement of net-zero carbon even harder and more expensive.
- Investment in roads should focus on maintenance and renewal, or providing capacity for bus priority measures.
- Investment in digital infrastructure is critical for increasing connectivity and productivity as well as helping reduce the need to travel and should be given a greater priority than road building.
- The strategy needs to look more closely at demand management measures and how it can influence planning to reduce the need to travel.
- New development should be located where it is best served by public transport and should not be facilitated by building new roads.
- There needs to be a complete reappraisal of the role of walking and cycling within the strategy and they need to become a top strategic priority.
- The strategy should set challenging (but achievable) modal split targets to drive change.

If improving the regional economy is a major driver behind this strategy, then the focus needs to be on towns and cities where most of the economy is based. To make them more attractive, efficient and resilient, there needs to be investment in high-speed, high capacity digital communications, greater ease of moving around reliably and more attractive places to support greater interactions and to attract inward investment. The latter two points can only be achieved by a significant shift to walking and cycling, supported by better public transport.

Responses to questions:

Our Approach

6. To what extent do you agree or disagree with the use of this ‘decide and provide’ approach?

Strongly agree

7. To what extent do you agree or disagree that transport policy across the South East should evolve in this way?

Strongly agree

8. How important do you feel the key features of our ‘Sustainable Route to Growth’ scenario are for the future of the South East?

- The South East is less reliant on London and has developed its own successful economic hubs – **Fairly important**
- The benefits of emerging technology are being harnessed – **Very important**
- Land-use and transport planning are better integrated – **Very important**
- A shift away from private cars towards more sustainable travel modes – **Very important**
- Targeted demand management measures, with more mobility being consumed on a ‘pay as you go basis’ – **Very important**
- The transport system delivers a cleaner, safer environment – **Very important**

9. Do you have any additional comments about our approach to developing the draft Transport Strategy?

While we strongly agree that a different approach to transport planning and provision is needed, delaying that change by continuing business as usual for the next 5 – 10 years is something we are strongly opposed to. We are in a climate emergency and suffering from significant obesity and health issues exacerbated by excessive car use and obesogenic environments. There are also significant air and noise pollution issues all of which have a negative impact on people’s quality of life and the regional economy.

Therefore, waiting to make these changes is perverse as it will add to costs, undermine quality of life and make it harder to tackle climate change. There is no reason why the change in approach could not happen from day one.

In terms of the key features of the preferred option, there are a number of issues that need addressing:

- New technology should be a slave to the needs of the region, not a master, i.e. it should not be allowed to dictate what happens but should be crafted to what is needed.
- It will be essential to integrate land use and transport

- Describing the shift away from private cars to more sustainable modes as a key feature of the scenario is misleading when the scenario will lead to over 8% more road traffic than we have currently alongside a 13% drop in walking and cycling. This scenario is fundamentally flawed and unsustainable.

Our Area

10. To what extent do you agree or disagree that the evidence set out in Chapter 2 of the draft Transport Strategy makes a strong case for continued investment in the South East's transport system?

Neither agree or disagree.

11. Please use the space below to provide any other comments you may have about the information set out in Chapter 2, or any additional evidence that you think should be included.

We are not convinced that a strong case has been made for continued investment in the region's transport network. We are particularly concerned at the prospect that longer commutes are something the strategy is even contemplating accommodating given its many negative impacts, including social. Far more thought and research needs to go into providing greater local connectivity without the need for a car, alongside some strategic transport infrastructure upgrades. However, the principle focus should be on digital connectivity to allow more remote and home working and to reduce the need to travel.

In terms of describing the region, many key environmental assets are not mentioned in the draft strategy (although they are within the ISA) the most notable being the international environmental designations such as Special Protection Areas, Special Areas of Conservation and Ramsar sites. Other issues not addressed include the pressure on water supplies from increasing development and the vulnerability of many coastal areas from rising sea levels and more violent storms.

Our Vision, Goals and Priorities

12. To what extent do you support or oppose our vision for the South East?

Tend to support.

13. Do you have any further comments on our vision?

We strongly support aspects of the vision, even though it doesn't mention health, particularly around delivering a step change in connectivity and environmental quality and giving people the highest quality of life.

However, we have reservations about using the term 'sustainable economic growth' which we feel would be better replaced with 'sustainable economic development'. This better describes what is needed in the region and that continuous growth is not necessarily possible or desirable.

Also, the sentence within the vision regarding seamless journeys is somewhat misleading. These are not going to have much impact on international trade or global success directly but they will drive local efficiency and resilience which can make businesses more competitive.

14. To what extent do you agree or disagree with the goals set out within the draft Transport Strategy?

- Improve productivity and attract investment to grow our economy and better compete in the global marketplace – **tend to agree**
- Improve health, safety, wellbeing, quality of life, and access to opportunities for everyone – **strongly agree**
- Protect and enhance the South East’s unique natural, built and historic environment, and tackle climate change together – **strongly agree**

15. To what extent do you agree or disagree that these are priorities which the Transport Strategy should aim to achieve?

Economic priorities

- Better connectivity between our major economic hubs, international gateways and their markets – **tend to agree**
- More reliable journeys between the South East’s major economic hubs and international gateways – **tend to agree**
- A more resilient transport network to incidents, extreme weather and the impacts of a changing climate – **strongly agree**
- Helping our partners meet future housing, employment and regeneration needs sustainably – **strongly agree**
- Use of digital technology to manage transport demand, encourage shared and efficient use of transport – **strongly agree**

Social priorities

- A network that promotes active travel and active lifestyles – **strongly agree**
- Improved air quality through initiatives to reduce congestion and encourage shifts to public transport – **strongly agree**
- An affordable, accessible transport network for all that promotes social inclusion and reduces barriers – **strongly agree**
- A seamless, integrated transport network with passengers at its heart – **strongly agree**
- A safely planned, delivered and operated transport network – **strongly agree**

Environmental priorities

- A reduction in carbon emissions to net zero by 2050 – **strongly agree**
- A reduction in the need to travel, particularly by private car – **strongly agree**
- A transport network that protects and enhances our natural, built and historic environments – **strongly agree**

- Use of the principle of 'biodiversity net gain' in all transport initiatives – **strongly agree**
- Minimisation of transport's consumption of resources and energy – **strongly agree**

16. Are there any other economic, social and/or environmental priorities which you feel the Transport Strategy should aim to achieve?

While we feel transport links everywhere need to become more reliable and resilient, we are not necessarily convinced the main focus should be the long distance routes. A lot could be achieved economically, environmentally and socially by focussing on local journeys and connections. Improving these would increase efficiency and productivity across the region while also delivering on other aspects of the vision. Removing local journeys from longer distance routes would also help deliver more reliable longer distance journeys and improve connectivity. Their significance in this respect needs to be recognised.

17. To what extent do you support or oppose these principles?

- Supporting sustainable economic growth, but not at any cost – **tend to support**
- Achieving environmental sustainability – **strongly support**
- Planning for successful places – **strongly support**
- Putting the user at the heart of the transport system – **strongly support**
- Planning regionally for the short, medium and long-term – **strongly support**

While we strongly support the ethos of point one, we would prefer it to say sustainable economic development, rather than growth. The point is also misleading as sustainable economic growth should mean it covers social, environmental and economic considerations, not just economic. However, it appears the term sustainable is being used in a confusing and potentially misleading way. If it were truly sustainable, then there would be no need for the second part of the sentence or for the second bullet point about environmental sustainability.

18. To what extent do you agree or disagree that the key challenges relating to each of the journey types have been correctly identified?

- Radial journeys – **tend to agree**
- Orbital and coastal journeys – **tend to agree**
- Inter-urban journeys – **tend to disagree**
- Local journeys – **tend to disagree**
- International gateways and freight journeys – **tend to disagree**
- Future journeys – **tend to agree**

19. Please use the space below to make any additional comments on the key challenges that have been identified, or to explain any additional challenges that you think need to be addressed.

As a general point, we believe it is incompatible to be proposing significant road building, unless it is for bus priority measures, as this will increase carbon emissions as well as traffic and congestion and make it harder to meet the net-zero carbon target. We have said we

tend to agree that the key challenges have been identified as the ones relating to rail mostly have. However, links such as Uckfield – Lewes which offer greater resilience for radial routes and better access for inter-urban routes, falls between two stools.

Regarding inter-urban journeys, the role of the bus is mostly ignored as is the role of alternative transport such as electric bikes. The latter have a longer range and higher speed than a standard bicycle and consequently have the potential to make a far greater number of inter-urban journeys viable for cycling, provided there is safe infrastructure provision.

For local journeys, the importance of active travel has been downplayed in this strategy and the key challenges are skewed. For walking and cycling, the key challenge is safe, direct, convenient and attractive infrastructure. Whether it be in an urban or rural setting, it is equally important. The key challenges are finding the funding and designing to a consistently high standard to rapidly roll out comprehensive walking and cycling networks. Unfortunately, these important issues fail to be addressed. Design standards are probably overlooked as an important issue within the strategy because they are applied quite rigorously for new roads and so are not an issue. Unfortunately, the same cannot be said for walking and cycling.

In local journeys the strategy also ignores the advance of new technology such as electric bikes and scooters. E-bikes have the potential to remove a lot of car journeys – research commissioned by Friends of the Earth suggests up to half of all journeys¹. E-bikes also enable longer distance commutes because they require less effort and can travel at higher speeds². Yet none of this potential is recognised in the strategy and the key challenge of raising the uptake of e-bikes, to levels seen on the continent, fails to be mentioned. This is important because tackling this issue could reduce road traffic on these shorter journeys and alleviate some of the problems being raised as challenges elsewhere.

The issue of bus journeys at a local level and longer distance is also misrepresented, suggesting current levels, while lower than previously, aren't that bad. They fail to highlight that the loss of many services has already isolated and cut-off people, particularly in rural areas. Further cuts would affect some but in reality would not make a huge difference because many people have already had to leave rural areas, get a car, or have been left isolated. A complete overhaul in the way public transport is provided is needed in the south east, so that people wherever they live are able to lead fulfilling lives without needing to own or drive a car.

For international movements, while we agree surface sustainable transport links need to be improved to airports and ports, the strategy should not be contemplating airport expansion with the current climate crisis. Any airport expansion, risks leaving little or no carbon budget the region has for surface transport, which would make it incredibly difficult or expensive to meet the net-zero target. For ports the emphasis needs to be on moving freight to rail as its carbon footprint is so much smaller than road transport's.

¹ See section on e-bikes, [A radical transport response to the climate emergency](#), Transport for Quality of Life, October 2019

² [Segregated cycleways and e-bikes – the future of urban travel](#), Transport for Quality of Life, April 2019

20. To what extent do you agree or disagree with the initiatives we have outlined to address the challenges that have been identified for each journey type?

- Radial journeys – **tend to agree**
- Orbital and coastal journeys – **tend to agree**
- Inter-urban journeys – **tend to disagree**
- Local journeys – **tend to disagree**
- International gateways and freight journeys – **tend to disagree**
- Future journeys – **tend to agree**

21. Do you have any additional comments on the journey types which form part of our draft Strategy, including any of the initiatives we have identified for each of the journey types?

As we stated previously, it is incompatible with a climate emergency to propose the level of road building contained in this draft strategy.

Regarding future transport, the critical issue is digital connectivity, both mobile and cable and this needs to roll out into rural areas. While ride hailing apps and services can undermine public transport, that will only happen if these services are not properly licensed or managed. If that requires national legislative change then TfSE needs to lobby for that to happen. Equally, it should consider what powers it might need to ensure this scenario cannot happen in the south-east and bid for these.

Implementation

- Economic performance indicators – **neither agree or disagree**
- Social performance indicators – **tend to agree**
- Environmental performance indicators – **tend to agree**

23. Do you have any comments about the implementation of the Strategy including the performance indicators, our role and/or the future funding challenges?

The performance indicators will not help deliver the strategy for a number of reasons. We also strongly object to the inherent bias and discrimination in the strategy against local journeys as somehow not being economically important. Given towns and cities are normally the main centres of economic activity, local journeys are incredibly important to the efficient movement of people and goods in these areas. Yet only road and rail and to a lesser extent buses are considered economically important as depicted by how the indicators have been categorised.

Regarding local journeys, the current indicators for cycling are meaningless unless they are linked to quality standards and measured as part of a comprehensive and integrated network. Just delivery x miles of segregated cycle track is no good if it is in complete isolation or of poor design, including being in the wrong place, which is what often happens at present.

Regarding the carbon target, this is totally useless without interim targets and a monitoring of the amount of carbon the region has consumed against its overall budget. Without this anything that represents a drop in carbon use could be depicted as positive when in reality the region could have already exceeded its carbon budget well before 2050. That is the real danger with the current draft strategy's monitoring proposals.

A useful indicator not included would be the uptake of e-bikes by the region's population.

Finally, the big target that is missing is a road traffic reduction target. Given that research is pointing to the need reduce road traffic by a minimum of 20%, possibly up to 60%, road traffic reduction should be a target and road traffic levels should be an indicator³.

Regarding the actual implementation strategy we strongly object to the concept of using highway schemes to unlock development. That just creates car dependent developments, which in turn put further strain on an already heavily congested and polluted area, exacerbating air pollution and climate change.

The integration of planning and transport policy, investment in places for people and traffic reduction measures, including demand management, need to happen now and not be phased in after a huge tranche of roadbuilding has already taken place. It will make the strategy's aims harder to achieve as reallocating road space will become politically more difficult with even more cars on the road.

Integrated Sustainability Appraisal

24. To what extent do you agree or disagree that the Integrated Sustainability Appraisal represents a thorough assessment of the draft Transport Strategy?

Strongly disagree

25. Do you have any additional comments regarding the Integrated Sustainability Appraisal?

1. The assessment of general interventions⁴ when looking at highway improvements and new roads fails to acknowledge two important impacts:
 - a. Undermining impact on public transport, both as direct competition and through increasing road traffic on surrounding roads which would cause buses to be caught up in more congestion
 - b. Undermining of walking and cycling through increased traffic and road danger on surrounding roads and likely bigger convoluted (multi-stage) junctions that will come with new infrastructure

It also makes a sweeping generalisation about the impact on landscape and townscape from signage and traffic management features being "much reduced from new highways infrastructure". This might be true in local schemes where the authority has a strong

³ See Reducing miles driven, [More than electric cars](#), Transport for Quality of Life, February 2019

⁴ Page 13 and paragraphs 5.4.5 – 5.4.7, page 66, ISA

policy on clutter, but otherwise it is wishful thinking and especially so when considering SMART motorways and all the gantries and illuminated signs that they require.

2. It appears to put the negative impact of new rail lines on a par with new roads in the Integrated Sustainability Appraisal (ISA). While new railway lines have an impact, their visual impact is likely to be less than a new road because their footprint is smaller and unlike busy roads, they are not continuously in use, so there is respite from visual distractions (movement in the landscape) and noise. However, the ISA does not mention these important differences⁵ and instead seems to ascribe an impact solely to rail which also applies to road, which is the ability to fragment or degrade farmland.

When discussing the biggest benefits from rail, it fails to mention reducing carbon emissions (as rail is much less carbon intensive than road) and the ability to reduce road traffic.

3. Improvements to other public transport services says the focus of benefits will be on the elderly and disadvantaged⁶ but fails to mention children and young adults who are also big users and with better and potentially cheaper services would also increase use significantly.
4. It says new walking & cycling infrastructure will have a positive impact (health & environment) yet this is heavily dependent on design which is often poor and wasn't mentioned in the ISA⁷. In addition, projections for the preferred scenario are for falling use, which would suggest that the scenario is unsustainable or the modelling is poor and unreliable.
5. It underplays the importance of walking and cycling facilitating longer distance travel (access to public transport) and hence reducing congestion on the SRN⁸.
6. Health Impact Assessment summary⁹ says impact of new roads is predominantly due to air quality but fails to address the key issue associated with car use and that is a lack of physical activity and obesity. This is important as this issue is equally a problem for electric cars.
7. The Equalities Impact Assessment summary¹⁰ found the interventions overall are likely to be positive for people who are younger or older or deprived. It mentions improvements to walking and cycling as helping people move away from private vehicles yet the preferred scenario would see a 13% drop in walking and cycling and a more than 8% increase in traffic so it's not clear what strategy it assessed.

⁵ Page 14 and paragraph 5.4.8, page 66, ISA

⁶ Page 14 and paragraph 5.4.10, page 67, ISA

⁷ Page 14 and paragraph 5.4.11, page 67, ISA

⁸ Page 15 and paragraph 5.5.3, page 69, ISA

⁹ Page 15 and paragraph 5.5.3, page 69, ISA

¹⁰ Page 15 and paragraph 5.5.7, page 69, ISA

8. The ISA has not included the large number of mostly road schemes being progressed by Local Enterprise Partnerships (LEPs), Highways England and National (sic) Rail as they have previously been assessed as part of the Appraisal of Sustainability for the National Networks National Policy Statement (NNNPS). However, there are several issues with this:
 - a. The LEP schemes were not considered as part of the NNNPS
 - b. The Appraisal of Sustainability for the NNNPS is somewhat suspect given emissions continue to rise from transport
 - c. The Appraisal of Sustainability is out of date since it is 6 years old and the carbon targets have been tightened since it was published

Any schemes going forward within the lifetime of the strategy should be assessed by this ISA.

9. In the summary of the sensitivity assessment of strategic corridors¹¹ because a number of the corridors have rail included, the full impact of increasing road capacity along these corridors is hidden. For example, expanding rail will have some carbon costs for construction, but would have far lower on-going costs than a road and if delivering a modal shift would deliver carbon reductions. In contrast road expansion in these corridors would only increase carbon emissions. Yet the scoring for per capita emissions is amber, signalling there could be positives and negatives but not making it clear that the roadbuilding would deliver significant negative impacts. There will be similar issues for other components. More worrying perhaps is that carbon emissions aren't even mentioned in the summary of the table¹². While this difference is recognised in the more detailed Tables (A.1 – A.23) this is only within the detailed description. The headline scoring is only amber.

Although specific interventions (such as new roads) are listed in Table 5.4¹³ these are separate to the individual corridors. This separation is not helpful when considering what to take forward in specific areas and really they should be applied for each corridor.

10. Wrongly states that Brighton / Worthing / Littlehampton zone is compliant on annual mean nitrogen dioxide¹⁴.
11. Looking at new walking and cycling facilities it says to focus on routes out of town and walking in new developments – missing big opportunity to push cycling for everyday journeys¹⁵.

¹¹ Table 5.2, page 53 and Tables A.1 – A.23, pages 89 – 237, ISA

¹² Paragraph 5.3.5, page 57, ISA

¹³ Page 68, ISA

¹⁴ Paragraph 4.3.20, page 41, ISA

¹⁵ Table 5.13, page 2, Appendix C, HIA, page 283, ISA

12. When considering carbon, it only looks at trends, not at the region's carbon budget or following a clear pathway to net-zero, so is not that helpful at informing decisions.
13. Appears to ignore congestion and pollution in surrounding towns caused by new roads – focuses on local congestion relief, although acknowledges it can create more traffic long term¹⁶.
14. Asserts new highways improve community safety but ignores the fact that people walking and cycling can be disadvantaged in new designs (faster speeds, more lanes to cross, etc) or presented with very complicated and time-consuming crossings and diversions¹⁷.
15. Obesity levels are stated as being low and poor activity levels are downplayed¹⁸ by presenting South East as better than national averages. However, the evidence presented in the Health Impact Assessment (HIA) shows that 60.3% of adults are overweight or obese in the south east compared to 62% nationally¹⁹. This is a marginal difference and should not detract from the fact that obesity is a major concern in the south east. Downplaying this issue has resulted in less emphasis within the draft strategy on the strategic importance of walking and cycling in particular.
16. The Equality Impact Assessment (EqIA) paints a rather rosy outcome of the draft strategy which is not warranted given the projected increase in traffic and drop in walking and cycling, Both of these impacts will negatively impact on people with limited or no access to a car and probably need better, not worse access to jobs and other services²⁰.
17. The EqIA assumes people with disabilities can't participate in active travel which is an oft repeated fallacy not backed up with any evidence²¹. In addition, even if disabled and in a wheelchair and unable to walk or cycle, disabled people can and do use walking and cycling infrastructure and so investment in these areas would directly benefit them.
18. The EqIA claims that new roads and highway improvements are beneficial for younger and older people, people with disabilities and the unemployed. Many within these groups don't have access to a car, and even if they did would not be able to drive it, so focusing resources on new highway infrastructure rather than affordable public transport and active travel will disadvantage them²². In addition, new highways infrastructure can result in longer and more circuitous and complex crossings,

¹⁶ Table B.1: Assessment of General Interventions, page 159 Appendices A & B, page 239 ISA

¹⁷ Paragraph 3.5, page 5, Community Safety Audit, page 316 ISA

¹⁸ Page 11, and para 4.3.38, page 44, Health summary section in ISA states that the region has "low levels of obesity"

¹⁹ Table 4.1, page 13 HIA, page 263 ISA

²⁰ Paragraph 5.6, page 18 EqIA, Page 301, ISA

²¹ Paragraph 5.7, page 19 EqIA, Page 302, ISA

²² Table 5.13, page 0, Appendix D, EqIA, Page 303, ISA

disadvantaging these groups further. This assessment is wholly inaccurate and needs revisiting as does much within this ISA.

Overall views

26. To what extent do you agree or disagree that the draft Transport Strategy provides the mechanism that will enable Transport for the South East to achieve our mission of growing the South East's economy by delivering a safe, sustainable and integrated transport system that makes the region more productive and competitive, improves the quality of life for all residents and protects and enhances its natural and built environment.

Strongly disagree

27. Are there any additional comments that you would like to make that are relevant to this consultation on the draft Transport Strategy for the South East?

The scenario planning process needs to be re-run. Previously only local authorities, LEPs and businesses were involved with these and as a consequence the preferred scenario has significant issues with it. There were no user groups, third sector, health, academic or independent professionals involved which skewed the development of this scenario.

In the modelling, no thought was given to e-scooters and e-bikes and the fact they would operate at higher speeds than standard scooters and bikes. This issue and the range of e-bikes has also been totally ignored within the draft strategy, yet has the potential to have a significant impact on its outcomes.

Within the draft strategy in the review of strategic policy it doesn't mention new net-zero carbon target or fact that the Department for Transport plans are seriously off-track as reported by Committee on Climate Change. There was also no mention of national health priorities or the Cycling and Walking Investment Strategy.

There needs to be greater acknowledgement of the climate emergency many local authorities have signed and a better consideration as to what is needed to address this and meet the net-zero carbon target by 2050 while still remaining within the region's carbon budget. This essential part of the strategy is missing.

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Chris Todd

Director

Transport Action Network

Transport Action Network provides free support to people and groups pressing for more sustainable transport in their area and opposing cuts to bus services, damaging road schemes and large unsustainable developments

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