



Response to:

**Transport for the South East's
consultation on its
draft Strategic Investment Plan**

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1. Introduction

1.1 Transport Action Network (TAN) welcomes the opportunity to comment on Transport for the South East's (TfSE) draft Strategic Investment Plan (SIP). This response covers our main concerns and not necessarily every detail or scheme within the SIP.

2. Headline concerns

2.1 The plan is not fit for purpose, as it will not deliver the stated objectives of decarbonisation, adapting to a new normal, levelling up, regeneration and growth and more (pages 24-25). While TAN acknowledges the proposed level of investment for rail schemes in the SIP, the priority given to road schemes in number, size and preference, completely undermines the stated objectives: road schemes are proposed in detail and mostly before 2030, with rail less detailed and coming much later.

2.2 Out detailed concerns include the following:

1. The document takes a Business-As-Usual (BAU) approach despite claims to the contrary, which will undermine delivery on TfSE's stated objectives, deny choice and undermine the economy.
2. The large number of road schemes (over 90), together with their phasing, with over 50 road schemes to be built by 2030, will increase both traffic and emissions. This is at the most critical period in which urgent action is required to reduce carbon emissions.
3. Some road schemes, such as the Lower Thames Crossing, are under-costed and any cost overruns risk the schemes being built at the expense of alternative, sustainable forms of travel. This is especially true of local authority schemes.
4. The phasing of mass transit and rail, a large proportion of which are pushed back to the medium and long term when they are needed sooner rather than later. They are at high risk of not being delivered, an issue not addressed within the draft SIP.
5. Active travel is an afterthought and underfunded with inconsistent approaches across the region and a total reliance on Local Highways Authorities (LHAs) progressing this. Based on current performance of many LHAs, active travel and modal shift objectives will not be delivered.
6. The draft SIP uses misleading statistics to hide its true impact. When people read that the draft SIP will lead *"to 4 million fewer car trips"* (page 11), they will

assume this relates to conditions today, not against some fictional future. The reality is it will increase traffic above today's levels.

7. The draft SIP's projected carbon pathway is erroneously compared with a highly unlikely scenario, requiring a reversal of Government policy on Electric Vehicles (EVs). Rather than delivering significant carbon savings, the draft SIP will actually make things worse.

3. Business as usual

- 3.1 The draft SIP rightly identifies that a BAU approach will be bad for the region, swamping it with traffic and restricting economic growth, while failing to reduce inequality and carbon emissions quickly enough (page 31). However, tackling transport issues as essential for solving the housing crisis is something far beyond the scope of the draft SIP. While transport can play a role in facilitating development, it will have an immaterial impact on affordability, compared with the other deep-rooted issues within the housing market.
- 3.2 Nevertheless, the draft SIP is simply more BAU, prioritising road investment over active travel and public transport. Despite claims to the contrary about following a 'decide and provide' approach¹, the reality is still 'predict and provide'. Why else are so many road schemes delivered before 2030 when urgent action is needed to curtail carbon emissions²? A 'decide and provide' approach would see most roads scrapped and resources focussed on delivering the quickest possible reduction in carbon emissions through modal shift and demand management.
- 3.3 This concern is reinforced by taking a look beneath the surface of the draft SIP. It is clear that most road schemes are better developed, scheduled to be built sooner and have more certain funding streams. Of the active travel and public transport proposals that are scheduled for the short to medium term, many are less well developed and at significant risk of delay, or not happening at all, as funding, or action to deliver them is far from guaranteed.
- 3.4 The failure of the draft SIP to reduce carbon emissions sufficiently can be seen by the number of iterations of the scenarios that are needed to deliver the requisite reductions quickly enough. Rather than remove the elements of the draft SIP causing the problem (the road building) to reduce the carbon footprint, the draft SIP relies on external 'global' package interventions over which it has no control and very little influence (page 34, Table 3, pages 111-114).

¹ Page 11, Highways Thematic Plan, TfSE – June 2022

² [Press release](#) about IPCC Sixth Assessment Report, Climate change: a threat to human wellbeing and health of the planet. Taking action now can secure our future, IPCC – 28 February, 2022

3.5 Indeed, there is no guarantee that these global interventions will happen at all, or to the extent required to make the draft SIP compliant on climate grounds. This is a high-risk strategy and is not a sound way forward for the region, especially in light of the evidence that the climate is changing quicker than predicted and our window of opportunity for taking decisive action is narrowing fast³.

4. Road building

- 4.1 The failure to acknowledge and address the problems caused by building new highway capacity is a fundamental flaw of the draft SIP. TFSE convinces itself that the impact of the draft SIP will be offset by actions elsewhere but is unconvincing in showing how this will be achieved. Additionally, it promotes the line that roads are good for active travel and public transport, a message repeated on social media, without any evidence to back this up (pages 34 & 73).
- 4.2 Most, if not all, road schemes listed in the draft SIP are expanding road capacity for private vehicles. This will not only drive-up traffic and emissions on any expanded road, but also on the surrounding road network. Any short-term benefit gained along a particular route for active travel and public transport (if new cycle and bus facilities are provided) will be lost on the surrounding network where conditions will deteriorate. Making it easier to drive undermines the viability and attractiveness of active travel and public transport, further compounding the problem.
- 4.3 The roads bias of the draft SIP can be seen in the figures. In table A.1 (pages 128/9) there are 43 'existing and committed programmes', only one of which is a public transport scheme; the rest are all roads. Even the table is misleading, giving the impression these are a done deal when in reality that is not the case. For example, this table contains potential schemes for RIS3 which are far from settled, with the consultation on National Highways Initial Report yet to take place. Even then the publication of the draft RIS3 is some time off. Indeed, only 6 of these 'existing and committed programmes' are being built, while one is paused, so it clearly doesn't follow that they all have to be built.
- 4.4 Looking beyond the so-called 'existing and committed programmes', the draft SIP lists a further 49 road schemes (table A.3, pages 131-139), 12 of which it lists as short term, i.e. to be delivered before 2030. 35 of the schemes are medium term (before 2040) and 4 long term (before 2050).
- 4.5 In total, the draft SIP promotes 84 new roads, 44 of which are to be delivered before 2030. This is a staggering amount for a supposedly rebalanced strategy and

³ [Press release](#) about IPCC Sixth Assessment Report, Climate change: a threat to human wellbeing and health of the planet. Taking action now can secure our future, IPCC – 28 February, 2022

implementation plan. It is no wonder that the draft SIP is in trouble when trying to meet the required carbon reduction pathway.

- 4.6 The other potential impact is that focussing so much effort on supporting new roads, will divert the necessary resources away from active travel and public transport improvements. Most Local Highways Authorities (LHAs) are already overstretched after years of cutbacks due to austerity. Unless they relinquish some of their current priorities (roads) for active travel and public transport interventions, the latter will not be delivered anytime soon.

5. Public Transport

- 5.1 Of the list of 166 public transport interventions, the vast majority (97) are not scheduled for implementation until after 2030, with 13 not scheduled until after 2040. The 69 short term improvements are mostly to bus services, which rely on significant revenue funding as well as capital investment in new buses – both highly unlikely – if they are to make any real impact.
- 5.2 Given the recent Treasury raid on funding, originally allocated for Bus Service Improvement Plans, to pay for Covid support, these desirable aspirations are unrealistic. Even if funding were to be available, the current shortage of bus drivers risks undermining the plan, without any programme of bus driver training, something absent from the draft SIP.
- 5.3 Another concern is that some of the interventions listed as mass transit could lead to an increase in car use and carbon emissions⁴, while undermining longer distance and rural public transport. The so-called ‘strategic mobility hubs’ are little more than renamed park & ride provision. Their inclusion wastes time and resources in pursuing locations which have consistently been turned down to date, particularly around Brighton, because of their impact on the South Downs National Park and its setting and the lack of other options elsewhere.

6. Active Travel

- 6.1 Active travel is the poor relation in the draft SIP. Despite a welcome recognition that it is strategically important, critical for reducing car use and enabling people to access longer distance bus and rail services, it is still dealt with in an inconsistent and laissez faire way.
- 6.2 Across TfSE’s four areas, there is a wide disparity in approach. This is worrying as it suggests there is no coordinated effort to create a joined up and fully functional network within and between urban areas. For example, London – Sussex Coast, and

⁴ [The Effectiveness of Park & Ride as a Policy Measure for more Sustainable Mobility](#), Parkhurst and Meek, University of the West of England - 2014

Kent, Medway and East Sussex have 27 named schemes between them, although the latter has less than 1% of funding allocated to Active Travel (page 79). In stark contrast, London Wessex has just one, while Solent and Sussex Coast has none.

6.3 While LHAs should produce a Local Cycling and Walking Investment Plan (LCWIP) to guide investment in their area, TfSE needs to take a lead in identifying the key routes within the region that need upgrading or building. Obvious omissions include the North Kent Coast network from Thanet to Dartford, including links to Canterbury, the Sussex Coast route and Brighton to Lewes. The latter serves two universities and Brighton & Hove Albion's football stadium at Falmer. Given that some routes will be outside the control of LHAs, there is a real benefit in flagging up their importance strategically to ensure bodies, such as National Highways, prioritise funding.

6.4 The draft SIP makes grand claims about active travel which it is hard to give credence to. For example, it states (on page 49) that:

“All three Local Transport Authorities on the Sussex Coast have ambitious plans to improve cycling and walking in their areas...”

6.5 While Brighton & Hove City Council has delivered and continues to deliver walking and cycling infrastructure of high quality, West Sussex County Council and East Sussex County Council have poor past records. Their failure to obtain allocations in the last national funding rounds for cycling indicates little is likely to change. Indeed, West Sussex has just overseen substandard facilities implemented along the A2300 and the A259, along with a design on the A2300 that has severed popular cycling routes on quiet country lanes.

6.6 Too many routes are considered as recreational, rather than important utility routes for everyday cycling. That mindset needs to change, if active travel is to fulfil its true potential and maximise the benefits it offers. This can be seen in the low economic values attributed to the active travel interventions, in contrast to the evidence which shows that cycling has far higher benefit-cost ratios (BCR) than road interventions^{5,6}. It could also be down to deficiencies in the model used.

6.7 While the overall ask for active travel sounds ambitious at £2.2bn, this is not enough to deliver on Government targets^{7,8} for:

- 50% of all journeys in urban areas to be walked and cycled by 2030 (46% by 2025)

⁵ Page 22 shows cycling schemes to have an average BCR of 13:1, [Walking & cycling: the economic benefits](#), Transport for London – August 2019

⁶ Table 2-1 shows road schemes in RIS1 to have an average BCR of 4.5:1, [Road Investment Strategy: Economic analysis of the investment plan](#), DfT – March 2015

⁷ Page 9, [Transport Decarbonisation Strategy: A Better, Greener Britain](#), DfT – July 2021

⁸ [The second cycling and walking investment strategy \(CWIS2\)](#), DfT – July 2022

- A doubling of cycling by 2025 (on 2013 figures)
- increasing walking generally
- increasing the percentage of children aged 5 to 10 who usually walk to school from 49% in 2014 to 55% in 2025

6.8 Given that total national funding is only £3.8bn up until 2025, even with more becoming available after that, it is questionable as to whether there will be sufficient funding to deliver on the draft SIP's ambition or to deliver the change required. As we have already flagged, LHA capacity to roll out significant active travel infrastructure and at speed is also questionable, especially with significant resources focussed on new highway capacity.

7. Misleading claims and statistics

7.1 The way that statistics about the apparent benefits of the draft SIP are presented are misleading and follow the disingenuous way that they were presented in TfSE's Transport Strategy. In both instances, they compare the proposed future with some fictional future (without any interventions), rather than present reality. This obscures the fact that implementing the draft SIP will create more traffic and pollution. For example, page 11 of the draft SIP talks about less traffic and fewer carbon emissions as though they were absolutes, but omits to mention that these are not comparisons with today's figures.

7.2 Given the need for a 68% cut in carbon emissions by 2030 to meet the UK's international obligations, and with numerous Government targets to increase walking and cycling and aspirations to reduce traffic, including increasing car sharing⁹, the BAU scenario used by TfSE is misleading and inaccurate. As the names implies, BAU should reflect existing policies and plans and not an artificial scenario that ignores Government policies such as to the ban on cars and vans powered by internal combustion engines from 2030 / 2035. By artificially raising projected carbon emissions in this way, the draft SIP's paints its projected carbon pathway in a flattering light.

7.3 Another example of an unsubstantiated claim is on page 50:

"A better designed highway network will deliver improved air quality in urban areas and reduce impact of road traffic on the South Downs National Park."¹⁰

⁹ Page 6, [Transport Decarbonisation Strategy: A Better, Greener Britain](#), DfT – July 2021

¹⁰ Page 35, Solent and Sussex Coast: Strategic Programme Outline Case, TfSE – June 2022 also makes this claim of reduced impact on the South Downs National Park

- 7.4 There is no evidence to support this and the Integrated Sustainability Appraisal hints otherwise. Expanding the highway network, especially the A27, will increase the volume and speed of traffic around and through the South Downs National Park and, hence, more demand for car access to and car parking in and around the National Park. Any traffic reassignment to the A27 from other roads through the National Park will be short term given overall traffic rises and the negligible benefits will be more than offset by the negative impacts.
- 7.5 The A27 is another example where misleading statements are made to justify expanding the capacity of the road along its entire length. Aside from trying to attempting to reframe a roads-based intervention as sustainable, the draft SIP makes claims about the number of vehicles travelling long-distance on the A27^{11,12} that do not stand up to scrutiny. These assert that 80% of journeys through Arundel are long-distance, yet evidence from National Highways suggests that 72% of journeys are less than 15km and over 50% are less than 10km¹³. If such basic information is misrepresented, little confidence can be had in other figures within the draft SIP. The case for the A27 is weak and, given the trip lengths of most road users, other more sustainable transport interventions would have greater impact and benefit, cause less harm, and potentially be cheaper as well.

8. Timing and phasing

- 8.1 The draft SIP recognises that the timing and phasing of transport infrastructure is incredibly important to avoid negative consequences. As an example, it states (page 115):

“Ensuring highway projects are not delivered before enhanced mass transit and electric vehicle charging networks are in place to avoid inducing additional private car ownership and or use of carbon-intensive vehicles”

- 8.2 This welcome recognition of the need to promote and build sustainable transport first is not what the draft SIP is advocating. Instead, it supports 51 road schemes to be delivered before 2030, with most mass transit coming after that time and certainly not ahead of most road schemes. While having electric charging networks in place is important, this won't have a major impact on the number of fossil-fuelled cars on the road ahead of 2030.
- 8.3 Another, worthwhile aspiration is:

¹¹ Page 24, Highways Thematic Plan, TfSE – June 2022

¹² Page 28, Solent and Sussex Coast: Strategic Programme Outline Case, TfSE – June 2022

¹³ Figures 9-8, 9-9 and 9-10, pages 123-5, [A27 Arundel Bypass: Combined Modelling and Appraisal Report, National Highways](#) – 30 August 2019

“Making sure mass transit and active travel infrastructure is fully integrated with major highway projects such as the Lower Thames Crossing.”

- 8.4 Yet, evidence to date is that National Highways (NH) strongly resists putting in anything other than the bare minimum, often using lower standards in new schemes (A303 Sparkford to Ilchester, A428 Black Cat to Caxton Gibbet, A12 Chelmsford to A120 Widening Scheme, etc). To date, it has shown little interest in helping to deliver on Government ambitions to increase walking and cycling. It would be interesting to understand how TfSE envisages changing NH’s approach to new schemes. For example, how will mass transit and active travel infrastructure be fully integrated into the Lower Thames Crossing when current designs exclude non-motorised users crossing the Thames and do not support public transport?

9. Carbon pathways

- 9.1 The approach in the draft SIP is best summed up by this quote from page 63:

“Some highway interventions can present a trade-off between economic growth and carbon emissions. The economic benefit of accommodating more freight and unlocking growth in this area is a key objective for TfSE, and this package helps towards that.”

- 9.2 This approach is behind all highway interventions which propel the draft SIP in an unsustainable direction. It also misses the point that other interventions could equally deliver the required outcomes. Given the urgency and severity of the climate situation, the current approach is not tenable and far greater resource and effort needs to be directed at moving freight onto rail, particularly from the region’s ports and to reducing road traffic overall. This would provide numerous other benefits in terms of reducing air pollution, congestion, crashes and the impact on families, NHS and the economy.

- 9.3 The draft SIP states:

“This decarbonisation report presents a detailed analysis of what those “realistic policies” are in the context of transport in the TfSE area.”¹⁴

- 9.4 Yet, this is precisely what the draft SIP is not doing. It is promoting high carbon infrastructure at the most sensitive time when we need to be making serious reductions in emissions and before the real benefits of vehicle fleet electrification will be fully realised.
- 9.5 When the draft SIP outlines the legal and policy framework, it fails to mention the UK’s Nationally Determined Contribution (NDC) which requires a 68% cut in

¹⁴ Page 8, Transport Decarbonisation Thematic Plan, TfSE – June 2022

emissions on 1990 levels by 2030¹⁵. Although the NDC is mentioned later on, there is still no mention of the 2030 target date¹⁶. This reinforces our concerns about the need for urgent and decisive action to reduce carbon emissions as soon as possible and certainly by 2030. There is no grace period where TfSE can carry on building new roads and increasing emissions up to 2030, before changing tack. It has to act now and that is why this draft SIP, with its 51 road schemes to be delivered before 2030, represents a damaging BAU approach.

- 9.6 Behind the figures quoted in the draft SIP, the amount and timing of carbon savings from each of the various packages are unclear. The phasing is fundamental as to whether we will be able to reduce carbon emission quickly enough. The Climate Change Committee highlights the urgent need for demand management measures ahead of realising significant benefits from electrification of the vehicle fleet¹⁷:

*"Limiting traffic growth. Electric vehicles must not be the sole focus, with action also needed on demand and modal shift. The Government has made the significant step of acknowledging the need to limit traffic growth and has provided significant funding to some key areas, but it has not set a specific ambition or used all its available levers. It now needs to go further to set this aspect of the sectoral pathway in motion. **Reducing traffic is important as it can offer immediate emissions reductions while the fleet is transitioning to ZEVs, reduce the emissions associated with ZEV production, and deliver a range of ongoing co-benefits including lower congestion, better air quality, and cost savings.**" [Our emphasis]*

- 9.7 Given the large road building programme before 2030 and with few sustainable alternatives in place by then, it is difficult to see how demand management might be implemented, or significant carbon reduction realised, during this critical period. This is important as 2030 is the date we need to have a 68% cut in emissions for the UK to meet its NDC.
- 9.8 Another issue which is reinforced by the recent legal judgement on Net Zero¹⁸, is that the Government's plans and policies are not certain to deliver net-zero by 2050 within our existing carbon budgets. This highlights further the need to apply the precautionary principle.

Misleading baseline

- 9.9 The 'Do Nothing' baseline is disingenuous as it ignores a clear Government policy to alter the status quo, and is therefore by definition a 'Do Something' scenario:

¹⁵ Page 8, Transport Decarbonisation Thematic Plan, TfSE – June 2022

¹⁶ Page 26, Transport Decarbonisation Thematic Plan, TfSE – June 2022

¹⁷ Page 114, [2022 Progress Report to Parliament](#), Climate Change Committee - June 2022

¹⁸ [Friends of the Earth et al v. Secretary of State for Business, Energy and Industrial Strategy](#), 18th July 2022

“reversal of the existing national policy banning the future sale of internal combustion engines, low levels of modal shift and progressive spatial planning principles.”¹⁹

- 9.10 By using a ‘Do Something’ scenario that overstates the carbon emissions from a truly ‘Do Nothing’ approach, any scenario that TfSE adopts will appear to be better at reducing emissions than it is in reality. Further, it hides the fact that the approach adopted in the draft SIP will make things worse, and not better, in terms of carbon emissions.
- 9.11 Having low levels of modal shift in the baseline is by contrast an accurate reflection of current aspirations and achievements. However, including progressive spatial planning principles are fine words but it is unclear what they mean for the baseline. Indeed, hoping for improved planning outcomes could be rather optimistic given that most significant planning decisions are making things worse by locking in car based developments. With many such developments already in the pipeline, this trend is likely to continue, although the impact of this on regional emission levels is likely to be marginal compared to the imagined electric vehicle policy reversal.

Key Challenges

- 9.12 The key challenges outlined within the Transport Decarbonisation Thematic Plan are split into two sets of issues: those ‘Broader issues’ that require action across multiple sectors and a second group with more direct relevance to transport.
- 9.13 We disagree with this split as the first issue raised is the lack of speed of decarbonisation within the transport sector which is predominantly down to the transport policies and programmes. The second issue relates directly to changing circumstances and so should be about designing the transport infrastructure for what we need, rather than following the predict and provide approach of this draft SIP.
- 9.14 The last two points are broader than transport, but in many instances the importance of transport in them is understated and overlooked. Levelling up is about improving access to jobs and life choices for those most in need. These are people who are least likely to have access to a car and most in need of affordable sustainable transport choices, a factor often overlooked by those trumpeting ‘levelling up’.

Carbon impacts of different packages

- 9.15 Table 6.2 (page 62) shows either modest carbon savings from the various area packages, except Kent, where emissions increase. The table doesn’t show the phasing of emission savings, which is likely to show a significant increase in earlier years, jeopardising the UK’s 2030 NDC.

¹⁹ Page 20, Transport Decarbonisation Thematic Plan, TfSE – June 2022

- 9.16 Table 6.1 (page 62) shows that most carbon reduction depends on global interventions, few of which TfSE can influence. Even if TfSE could influence bus fares, funding would still be needed from central Government, which seems currently unlikely.
- 9.17 Table 6.1 highlights that the biggest drop in emissions is expected to come through virtual living – less commuting and less travel in general. While some savings are expected, it's not clear whether TfSE is expecting significant new savings, or is counting change that has already happened.
- 9.18 Overall, TfSE is abdicating responsibility for curtailing emissions in areas where it or LHAs have control.

Carbon impacts of different scenarios

- 9.19 Figure 7.3 (67 and acknowledged on 68) clearly shows that TfSE's three core scenarios are out of line with UK climate targets, with emissions actually increasing over a 'real' BAU approach. Rather than reducing road building, TfSE relies on global interventions, over which it has little control, to address the draft SIP's shortcomings on climate change. While the 5 new scenarios in figure 7.4 show how different interventions would impact on the rate of reduction of the region's carbon emissions, all wrongly assume that savings would start immediately, or at a high rate.
- 9.20 Scenario 5 (spatial planning) has a long time-lag. Even if minor immediate improvements could be realised, this would require planning teams across the region to take concerted and immediate action to prioritise transport and carbon impacts in planning decisions. Updating such policies could take up to 10 years and substantial change through this scenario is unrealistic much before 2030.
- 9.21 Scenario 6 – urban demand management policies could help. While potentially quicker than planning, they would still take time to implement, especially if they required significant funding and construction. Again, this pathway is likely to be unrealistic to deliver sufficient savings quickly enough.
- 9.22 Scenario 7 – road pricing. This is many years off and there is no evidence about how it would reduce traffic. Strong political resistance could lead to a lower tax take than that currently levied on fuel and vehicles which could make things worse, not better by increasing car use and traffic.
- 9.23 Scenarios 4 and 8 are about speeding up electric vehicle adoption and even if they were practicable, they would still take time to deliver significant benefits. Therefore, in all likelihood, none of the scenarios are realistic in their assessment of additional carbon reductions, certainly in the short term.
- 9.24 For the areas that TfSE can affect directly, there is no sense of any urgency within the draft SIP. For example, fast-tracking coordinating planning approaches across the

region to prioritise how local planning authorities can improve Local Plan policies on sites, transport, pollution and biodiversity, improve conformity to these policies and maximise carbon reduction from transport in new and refurbished developments. Or coordinating on parking levels and demand management measures, cross boundary public transport services and active travel infrastructure. This happens to some extent already but not at the scale and rate that the climate and ecological emergencies dictate.

10. Out of date modelling

- 10.1 The modelling used to determine the various scenarios uses data that is several years old and before the impacts were known of Brexit, COVID, war in Ukraine, slower GDP and population growth, falling car ownership²⁰. We have serious questions about the values that the model ascribes to different actions.
- 10.2 The SEELUM economic model for measuring which schemes are most beneficial is limited in its scope and skews towards road building being most “cost effective”. It is a traditional model that fails to properly capture non-travel time benefits such as health, wellbeing and the environment²¹, while often ignoring social equality issues. Active travel has traditionally been undervalued, as has travelling by public transport, even though someone’s productivity is greater than when driving. It is unclear how detrimental effects of noise and air pollution are assessed in the modelling too.
- 10.3 We also question whether the model is fit for purpose and able to handle falling rates of car ownership as has been seen through the pandemic. That trend could be increased with greater transport choices within urban areas and more restrictions on the private car, as cars become seen as a less of a necessity, even an encumbrance. This will have a knock-on impact on how people travel longer distances and create more demand for public and shared transport.

11. Levelling Up

- 11.1 Levelling up is quite rightly a Government priority, but can often lead to highly visible interventions that make little practical difference to people’s everyday lives. While some areas have higher deprivation than others, pockets of deprivation can be found throughout the region.
- 11.2 True levelling up would be seeking to find solutions across the region. In terms of this strategy that means focusing on transport and enabling people to access jobs. Given

²⁰ Section 1.4, [Less is more: Changing travel in a post-pandemic society](#), Centre for Research into Energy Demand Solutions (CREDS) - March 2022

²¹ [Computer Says Road](#): Why outdated transport models ruin new developments and how to fix them, David Milner, Create Streets – February 2022

that 77% of jobseekers don't have access to a car²² priority should be on improving active travel and public transport. Yet, the risk to the delivery of active travel and public transport is not really addressed in terms of LHA capacity and priorities, track records and funding. Even the limited proposals are not well advanced compared with the many road schemes that TfSE and the LHAs are promoting.

- 11.3 The negative impact of expanding highway capacity on public transport has not been addressed. It will take fare-paying passengers away from buses and trains which will reduce the ability of TfSE's partners to lower fares and provide high quality, high frequency services. This contradiction and undermining of the Levelling Up agenda is not acknowledged.
- 11.4 A good example of this is park and ride (strategic mobility hubs), which provides those with access to a car fast and convenient access to local urban centres. As well as not helping those in rural areas without a car to travel to urban centres and the services they provide, it can actively undermine the viability of longer distance bus services connecting rural and urban areas. Those without access to a car feel even more cut-off, while urban dwellers without a car are prevented from accessing the countryside and other recreational or work opportunities. None of these threats to the Levelling Up agenda are acknowledged or have noticeably caused the plan to be amended.

12. Summary of Integrated Impact Assessment

- 12.1 The Integrated Impact Assessment (IIA) appears to be a summary of the Integrated Sustainability Appraisal (ISA), although its exact status and role appears unclear. It sets out positive and negative impacts of the draft SIP, mainly by repeating sections of the ISA. It doesn't though explain how appraisals based on five radial and orbital corridors translate to the now selected four regions.

Table 3 ISA Assessment Summary

- 12.2 This table from the ISA highlights many of the positive and negative impacts of the draft SIP, including how many road schemes will increase carbon emissions²³. However, it does make some surprising claims and fails to stress how the large roadbuilding programme could derail the region's decarbonisation pathway to net-zero. It also does not appear to be that thorough in its appraisal as we have raised before²⁴.

²² Page 25, Levelling Up Thematic Plan, Transport for the South East – June 2022

²³ Page 27, Summary of Integrated Impact Assessment, Transport for the South East – June 2022

²⁴ Page 2, [Response to Transport for the South East's Draft Transport Strategy Consultation](#), TAN – January 2020

- 12.3 One such odd claim is that there may be positive effects from Smart Motorways and that these will contribute to improving greenhouse gas emissions²⁵. This is a strange claim and runs counter to the evidence available showing that most Smart Motorways considerably increase traffic and carbon emissions²⁶.
- 12.4 On landscapes and townscapes, the IIA (page 25) fails to mention the large landscape impact that a strategic mobility hub could have around Brighton & Hove for example, which is surrounded by the South Downs National Park. Even if not constructed in the park, it is likely that any such hubs would severely impact on its setting.
- 12.5 In contrast, the IIA (page 25) does acknowledge that:
- “Larger scale road schemes (e.g. A27 Lewes- Polegate, A27 Arundel, A339 road upgrades Newbury and Basingstoke, 3rd Thames Crossing at Reading, A227 road upgrades, Crawley Western Link Road, A2270/A2101 Corridor Movement and Access Package, Lower Thames Crossing, A21 Pembury – Hastings, Herne Bypass, Maidstone Relief Road, A28 Canterbury, A34 Resilience and the A3 Guildford upgrades)... ...are likely to result in substantial loss of land and loss of visual amenity which could have significant negative effects on landscapes. These include protected landscapes such as the South Down National Park and Chichester Harbour, High Weald, Surrey Hills, Kent Downs and North Wessex AONBs.”*
- 12.6 This is in stark contrast to the claims made in the draft SIP (page 50) that expanding the A27 would be beneficial for the South Downs National Park. It is also not clear if the IIA is appraising rail schemes accurately given their generally smaller footprint and different traffic and noise impacts. This was an error with the original ISA.
- 12.7 While the IIA highlights that road schemes could impact local communities due to increased air pollution, it fails to highlight that all road expansions, which increase traffic, will lead to increased air pollution across the whole of the road network, potentially making it harder to reduce nitrogen dioxide levels as quickly as possible. It also fails to acknowledge the increased severance that local communities often suffer with new highways infrastructure, unless National Highways can be convinced to take a radically different approach to active travel and local links.
- 12.8 The IIA is out of date on air pollution impacts as it is based on an ISA that is several years old. Since then, we have had the passing of the Environment Act 2021 that has recently consulted on lower particulate targets. At the same time the World Health Organisation has issued new guideline levels for many outdoor air pollutants but especially PM2.5s and Nitrogen Dioxide (NO₂)²⁷. It has slashed its recommended

²⁵ Page 26, Summary of Integrated Impact Assessment, Transport for the South East – June 2022

²⁶ [RIS2 carbon emissions derived from National Highways' figures](#), TAN – August 2022

²⁷ [Ambient \(outdoor\) air pollution](#), World Health Organisation (WHO) – September 2021

guideline levels after evidence that these pollutants have damaging impacts at much lower levels than previously thought. These recent changes are not reflected in the IIA or have they modified the approach taken by the draft SIP.

12.9 In contrast to new roads, while new rail freight paths may have some impacts on local communities that they pass close to, there are likely to be beneficial impacts on health and safety from less HGVs being on the roads, along with improved reliability and reduced traffic levels and air pollution.

12.10 Under community safety, there are some strange claims such as the A27 Lewes – Polegate scheme (page 28):

“will enable active travel interventions to be brought forward and improve safety in the villages of Wilmington and Berwick.”

12.11 Yet the existing East of Lewes scheme is already improving active travel in these areas. Aside from better crossings of the A27, which don't require a billion pound new road, little more could be done.

12.12 While safety enhancements might be realised by new road layouts, the IIA fails to address the overall increases in traffic which the packages will facilitate and which will have a negative impact on road safety over the wider road network. In fact, it falls into the trap of assuming that the draft SIP will deliver reduced traffic levels stating (page 28):

“A reduction in cars will lead to reduced levels of congestion and subsequently the number of accidents and near misses, enhancing safety across the IOSA.”

12.13 The reality is that car traffic will increase on today's levels, so the impacts are likely to be negative, not positive as claimed.

12.14 Additionally, the IIA makes some strange claims about strategic mobility hubs (park & ride) reducing cars on the road (page 28), when the reality is that they increase the distance driven by cars and only reduce traffic in urban areas with demand management measures such as the removal of car parking. Given the latter are not a given, there is no certainty over this claim.

Mitigation and Monitoring

12.15 It is concerning that in paragraph 5.3, the IIA appears to mix up the duty and purposes of National Parks, applying (wrongly) the Sandford principle to a National Park's socio-economic duty.

12.16 Most of the suggestions for mitigation and enhancement in table 4, appear logical and proportionate, which makes it all the more surprising that these then appear to have been largely ignored. For example,

“Large scale road schemes should be considered only if no other alternative is suitable to address issues as they will involve an unavoidable element of natural capital reduction and fragmentation of habitats.”

12.17 Yet when it comes to national landscapes, where the levels of protection are at their highest, the wording used does not reflect the legislation:

“Interventions within AONB or National Parks e.g. New Forest should be carried out with cooperation from the relevant authority to ensure that they do not adversely affect the landscape character or status of the AONB. These authorities should be engaged as part of the implementation of the transport strategies.”

12.18 National planning policy²⁸ is much clearer:

“176. Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty which have the highest status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas, and should be given great weight in National Parks and the Broads. The scale and extent of development within all these designated areas should be limited, while development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas.

177. When considering applications for development within National Parks, the Broads and Areas of Outstanding Natural Beauty, permission should be refused for major development other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest. Consideration of such applications should include an assessment of:

- a) the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;*
- b) the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and*
- c) any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.”*

²⁸ Paragraphs 176 & 177, [National Planning Policy Framework](#), Ministry of Housing, Communities & Local Government – July 2021

- 12.19 This lends weight for the need for a different approach to addressing transport issues in many areas within the South East.
- 12.20 On climate change, the IIA is even weaker (page 33), failing to highlight that the mitigation needed is for road building to be an absolute last resort and not the priority it appears to be, which will cause the draft SIP to undermine the UK's NDC by 2030. While it talks about reducing the need to travel by non-sustainable means, it does not highlight the parts of the draft SIP that are a real threat to this objective.

13. Monitoring and indicators

- 13.1 The monitoring should include mention of the relevant Government targets such as for active travel (page 121) and the UK's NDC. Air pollution monitoring (page 121) should aim to facilitate reducing levels as quickly as possible to the latest guideline levels from the World Health Organisation (WHO)²⁹, and not just monitor reductions, given that there are no known safe levels for nitrogen dioxide and particulates.
- 13.2 One indicator that is missing is modal share for public transport, while the increase in ticketing options is a poor metric to use. There need to be fewer ticketing options (not more) through streamlining the current overly complex system which deters people from using public transport.
- 13.3 Monitoring the number of road schemes delivered (page 120) is also a perverse metric, when these need to be substantially reduced. It's outcomes, not the means, that are more important to monitor. A better metric would be the (reduction in the) number of parking spaces and number of private vehicles registered in the south east. This would give a clearer idea if LHAs were delivering on this 'ambitious' programme and succeeding in giving people more choice so they no longer need their own private car.
- 13.4 Finally, the indicator of *"no transport schemes or interventions result in a net loss of biodiversity"* is out of step with emerging Government policy. The Environment Act 2021 introduced a new mandatory requirement for developments that result in loss or degradation of habitat to provide at least a 10% biodiversity net gain. This is set to become a requirement for planning applications from November 2023 and for Development Consent Orders from November 2025. Therefore, the draft SIP should follow, or exceed this requirement, but not undercut it.

²⁹ [Ambient \(outdoor\) air pollution](#), World Health Organisation (WHO) – September 2021

14. Conclusion

- 14.1 The draft SIP's many claims about its environmental sustainability do not stand scrutiny and appear more greenwash than reality. There are serious concerns at the number of misleading claims within the draft plan and the way that data is presented making it seem that it will lead to significant improvements over the current situation.
- 14.2 This is unfortunate as it might lead to people and organisations supporting the draft SIP in the mistaken belief that it will improve transport choice and lead to less traffic and carbon emissions. The reality is otherwise and the draft SIP could actually threaten the UK's NDC target of a 68% reduction in emissions by 2030 (over 1990 levels) by front-loading 51 capacity enhancing road schemes.
- 14.3 The only way that TfSE has been able to claim that the draft SIP will reduce emissions quickly enough is to rely on global interventions over which it has no or very little control. In doing so it fails to take action in the areas where it could make significant changes to reduce emissions. It is highly unlikely that TfSE's draft SIP will reduce emissions quickly enough.
- 14.4 This is exacerbated by the claims being made about active travel and public transport, which are at high risk of not being delivered in sufficient quantity or quickly enough. Despite acknowledgement that these should come first, many won't, with the most significant public transport interventions coming after many new roads have already been built.
- 14.5 Finally, much has been made on social media about how new roads serve all road users. This is disingenuous, as a short section of cycle infrastructure or bus lane is no compensation for expanded road capacity for private vehicles which have the opposite effect of managing demand that is needed to deliver on the objectives of this draft plan.
- 14.6 In conclusion, we strongly believe that the draft Plan is not fit for purpose, is misleading in the outcomes it will deliver, fails on demand management and ignores the risks to delivery of its most essential elements, the active travel and public transport improvements. Ultimately it will undermine choice, fail to tackle inequality and undermine the economy.

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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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